

ORIGINAL ARTICLE

RECONFIGURATION OF DISTANCE EDUCATION IN BRAZIL: IMPACTS ON UNDERGRADUATE PROGRAMS AND UNDERGRADUATE RESEARCH

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ABSTRACT

The article analyzes the reconfiguration of Distance Education (EaD) in Brazil, focusing on Decree No. 12,456/2025 and Ordinances No. 506/2025 and No. 2.539/2025. The new regulatory framework seeks to balance the democratization of access with the assurance of quality, formalizing the blended learning format, restricting fields such as Law and Medicine, and requiring mandatory in-person assessments with predominant weight. This transition generates tension between rigor and access. The study reflects on CNPq Ordinance No. 2,539/2025, which explicitly prohibited Scientific Initiation (SI) scholarships for EaD students. This restriction contrasts with the case of the Distance Scientific and Technological Initiation Program (PICT-EAD), which demonstrated the feasibility and effectiveness of SI in the digital environment. The challenge lies in implementing the new rigor without neglecting the inclusive potential and the research training capacity of the modality.

Keywords: Distance Education; Higher Education; Educational Legislation; Undergraduate Research.

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RECONFIGURAÇÃO DA EAD NO BRASIL: IMPACTOS NA GRADUAÇÃO E NA INICIAÇÃO CIENTÍFICA

RESUMO

O artigo analisa a reconfiguração da Educação a Distância (EaD) no Brasil, focando no Decreto nº 12.456/2025 e nas portarias nº 506/2025 e nº 2.539/2025. O novo marco visa equilibrar a democratização do acesso com a garantia de qualidade, formalizando o formato semipresencial, restringindo áreas como Direito e Medicina, e exigindo avaliações presenciais obrigatórias com peso majoritário. Essa transição gera uma tensão entre rigor e acesso. O estudo reflete sobre a Portaria CNPq nº 2.539/2025, que vedava explicitamente bolsas de Iniciação Científica (IC) para estudantes EaD. Essa restrição contrasta com o caso do Programa de Iniciação Científica e Tecnológica a Distância (PICT-EAD), que comprovou a viabilidade e a efetividade da IC no ambiente digital. O desafio é implementar o novo rigor sem negligenciar o potencial inclusivo e a capacidade de formação de pesquisa da modalidade.

Palavras-chave: Educação a Distância; Educação Superior; Legislação Educacional; Iniciação Científica.

REESTRUCTURACIÓN DE LA EDUCACIÓN A DISTANCIA EN BRASIL: REPERCUSIONES EN LOS ESTUDIOS DE GRADO Y EN LA INICIACIÓN CIENTÍFICA

RESUMEN

El artículo analiza la reconfiguración de la educación a distancia (EaD) en Brasil, centrándose en el Decreto n.º 12.456/2025 y en las Órdenes Ministeriales n.º 506/2025 y n.º 2.539/2025. El nuevo marco tiene por objeto equilibrar la democratización del acceso con la garantía de calidad, formalizando el formato semipresencial, restringiendo áreas como Derecho y Medicina, y exigiendo evaluaciones presenciales obligatorias con un peso mayoritario. Esta transición genera una tensión entre el rigor y el acceso. El estudio reflexiona sobre la Orden del CNPq n.º 2.539/2025, que prohibía explícitamente las becas de Iniciación Científica (IC) para estudiantes de EaD. Esta restricción contrasta con el caso del Programa de Iniciación Científica y Tecnológica a Distancia (PICT-EAD), que demostró la viabilidad y la eficacia de la IC en el entorno digital. El reto consiste en implementar el nuevo rigor sin descuidar el potencial inclusivo y la capacidad de formación en investigación de esta modalidad.

Palabras clave: Educación a distancia; Educación superior; Legislación educativa; Iniciación científica.

INTRODUCTION

Distance Education (EaD) in Brazil, which originated in the mid-twentieth century with correspondence courses, operated without official regulation until the mid-1990s (Hermida; Bonfim, 2006). The first legal framework to formally recognize EaD as a valid modality at all levels of education was the National Education Guidelines and Framework Law (LDB), No. 9,394, in Article 80 (Brasil, 1996).

Since then, the strategic expansion of EaD to democratize access to Higher Education, especially in a country of continental dimensions such as Brazil, has raised concerns about the quality, oversight, and social responsibility of the Higher Education Institutions (HEIs) that offer it. In this context, Decree No. 9,235 (Brasil, 2017a) represented a regulatory milestone by addressing the exercise of the functions of regulation, supervision, and evaluation of HEIs and undergraduate and *lato sensu* postgraduate programs in the federal education system.

Following technical studies, public consultations, and interinstitutional coordination conducted by the Ministry of Education (MEC), Decree No. 12,456 (Brasil, 2025a) was published on May 19, 2025, amending several provisions of Decree No. 9,235/2017.

Initially, a comprehensive assessment was conducted of the impacts of the expansion of EaD in Brazil, especially after the period of flexibility measures resulting from the COVID-19 pandemic. Based on this assessment, MEC promoted discussions with representatives of HEIs, education policy specialists, and academic organizations in order to identify regulatory gaps and propose structural improvements. The regulatory review sought to align the legal provisions with the guidelines of the LDB, the National Higher Education Evaluation System (SINAES), and the National Education Plan (PNE), incorporating principles of equity, accessibility, technological innovation, and enhancement of teacher education (Brasil, 2025d).

The new decree began to regulate the provision of undergraduate programs in in-person, blended, and distance formats, revoking Decree No. 9,057 (Brasil, 2017b) and amending provisions of Decree No. 9,235/2017. Subsequently, MEC Ordinance No. 506 (Brasil, 2025b) was published to regulate operational aspects of EaD, such as the accreditation of learning centers, faculty profiles, infrastructure requirements, and criteria for in-person assessment.

Also in this context, the publication of CNPq Ordinance No. 2,539, of November 17, 2025 (Brasil, 2025c), is closely related to the publication of Decree No. 12,456/2025 with regard to the renewed emphasis on in-person education and the qualification of teaching and learning processes aimed at scientific and technological research.

Previously, Normative Resolution No. 017/2006 (Brasil, 2006), issued by the National Council for Scientific and Technological Development (CNPq), established general guidelines for Scientific Initiation (SI), focusing on encouraging a vocation for research, training new researchers, and integrating students into academic activities, without imposing restrictions on the mode of implementation and even allowing institutional adaptations that, in contexts such as the COVID-19 pandemic, made remote practices feasible. CNPq Ordinance No. 2,539/2025, in turn, redefines this scenario by introducing stricter criteria, which explicitly prohibited the granting of scholarships to students enrolled in EaD programs and required in-person participation as an essential condition for training, continuous monitoring, and the integration of scholarship recipients into research groups.

This transition reveals a regulatory shift: from a more flexible and adaptable model centered on institutional autonomy to a more restrictive and standardized regulatory model. Both regulations converge toward an educational model that prioritizes direct interaction among students, faculty members, and research groups, recognizing that in-person experience is fundamental to the development of investigative skills, laboratory practices, and effective participation in scientific environments.

In view of this scenario, this article aims to analyze the main regulatory changes in EaD in Brazil, focusing on Decree No. 12,456/2025 and subsequent regulations. The study sought to reflect on the

tension between the new quality standards and the potential for exclusion by analyzing the prohibition, under CNPq Ordinance No. 2,539/2025, of SI scholarships for EaD students. To this end, the impacts of the Distance Scientific and Technological Initiation Program (PICT-EAD) on EaD students during its implementation were presented, as demonstrated by Bessa (2023), Bessa, Dias and Carvalho (2025), Martins (2025), and Carvalho (2026).

MATERIALS AND METHODS

This qualitative study is characterized as documentary research, in which data are obtained exclusively from documents in order to extract the information they contain and understand a given phenomenon (Lima Junior *et al.*, 2021). Accordingly, legal texts that preceded Decree No. 12,456/2025 and Ordinances No. 506/2025, No. 2,539/2025, and No. 2,634/26, published subsequently, were analyzed.

In addition, a literature review was conducted using articles available on Google Scholar. The initial search was carried out in November 2025 using the descriptors "Decree No. 12,456" AND "Challenges" OR "Impacts" AND "Perspectives". This search yielded 34 publications from 2025, filtered for the Portuguese language.

After screening the titles, articles addressing teacher education, emerging technologies, 2024 case studies, computational thinking, artificial intelligence, and inclusive education were adopted as exclusion criteria. The inclusion criterion encompassed only articles that addressed the implications, challenges, and perspectives of distance education in higher education. Thus, six (6) articles were selected for full reading and analysis; they constitute the corpus of this study and are presented in Table 1:

Table 1 - Articles analyzed.

AUTHORS	TITLE
Esmeraldo Malheiros - AMIES	Quality as a constitutional principle of Brazilian higher education
Thaís Cavenatti Barletta - USF	Distance Education and academic quality: perspectives under the new 2025 legal framework
Victor Ricardo Afonso de Souza - IFTM; riel Sodré Dias - Must University; Danielle Soares Lima Torres - Must University; Antonio José Ferreira Gomes - FICS; Whelmo Costa Talon - Must University; Ana Paula Ribeiro Messias - Must University; Edilson Damasceno - FICS.	From Distance Education (EaD) to blended learning: new directions for higher education under Decree No. 12,456
Chris Alves da Silva - UCB Valdivina Alves Ferreira - UCB	New regulatory framework for EaD: implications and challenges for higher education.
Frederico da Silva Cesario - C.I.P.I José Ricardo Martins Machado - C.I.P.I	Distance Education: new rules under Decree 12,456/2025, what changes?
Marco Aurélio Oliveira Dias - Must University; Abinei Marques Serafim - Must University; Maria Cecília Terence Dias - IFMG; Fernanda Kerley Queiroz Viera - Must University	Transitions from EaD to blended learning: challenges and opportunities for higher education under Decree No. 12,456

Source: Research data, 2025.

Table 1 presents the six articles selected in the search, organized by the authors' names and their respective titles.

DEVELOPMENT

Decree No. 9,235/2017 vs. Decree No. 12,456/2025: What changes in the regulation of EaD

With regard to provision formats, Decree No. 12,456/2025 replaces the term "modality" and formalizes the term "provision format," amending Decree No. 9,235/2017. Three provision formats are thereby officially recognized: in-person, blended, and EaD. Decree No. 12,456/2025 defines EaD provision as the synchronous or asynchronous teaching and learning process carried out through information and communication technologies, in which the student and the faculty member or other professional responsible for the educational activity are in different places or at different times (Brasil, 2025a).

The new decree establishes that undergraduate programs in Law, Medicine, Nursing, Dentistry, and Psychology must be offered exclusively in the in-person format. It also prohibits the provision of distance undergraduate programs in other health fields and in teacher licensure programs (Brasil, 2025a). Decree No. 9,235/2017 already stipulated that programs such as Law, Medicine, Dentistry, Psychology, and Nursing, even when offered by universities, required specific authorization from MEC. Furthermore, all HEIs must structure their Course Pedagogical Project (PPC) according to the provision format. Authorization acts will expressly indicate the approved format, and offering a program in a format other than the authorized one is prohibited.

Table 2 presents the minimum workload for each provision format under Decree No. 12,456/2025. EaD, whether synchronous or asynchronous, may be part of any format provided that the established percentage limits are respected. By comparison, Decree No. 9,235/2017 did not specify workload percentages, which were detailed only in MEC Ordinance No. 2,117/2019 (Brasil, 2019). In practice, the ordinance allowed in-person programs to provide up to 40% of their workload through EaD, whereas distance programs had no clear requirement for a minimum amount of in-person activity, resulting in considerable variation among institutions.

Table 2 - Minimum workload established for each provision format by Decree 12,456/2025.

PROVISION FORMAT	IN-PERSON ACTIVITIES (IPA)	MEDIATED SYNCHRONOUS ACTIVITIES (MSA)	EAD ACTIVITIES
In-person	Minimum of 70% of the total workload.	N/A	It is prohibited to exceed 30% of the total workload. (Exception: Medicine will have a minimum IPA percentage above 70%).
Blended	Minimum of 30% of the total workload.	Minimum of 20% of the total workload.	It may not reach or exceed the minimum limits of the in-person program (70% IPA).
Distance (EaD)	Minimum of 10% of the total workload.	Minimum of 10% of the total workload.	It may not reach or exceed the minimum limits of the blended program (30% IPA).

Source: Decree No. 12,456 (Brasil, 2025).

With regard to faculty, the Institutional Development Plan (PDI), an essential document for the accreditation of HEIs, already required, under Decree No. 9,235/2017, a description of the profile of EaD faculty members and tutors. Decree No. 12,456/2025 details and formalizes the composition of the faculty for this provision, assigning it the functions of planning, implementation, monitoring, and evaluation of teaching and learning processes. The categories provided for include course coordinator, lead professor, and content professor.

In addition, the faculty may include Pedagogical Mediators, who are responsible for mediation in teaching and learning processes and must have academic training compatible with their field of work. Course teams will also include tutors, whose functions now have an administrative character and are distinct from pedagogical mediation activities.

Within the scope of learning assessment, Decree No. 12,456/2025 establishes that all HEIs must administer mandatory in-person assessments in every curricular unit, regardless of the provision format. These assessments must be administered periodically at the headquarters of the HEIs, on campuses, or at EaD learning centers; carry the predominant weight in the final grade for the curricular unit; and include activities requiring discursive analysis and synthesis, accounting for at least one third of the final grade (Brasil, 2025a).

Regarding infrastructure, Decree No. 12,456/2025 determines the requirements that must be met by the HEI headquarters for all formats offered, as well as the infrastructure required for EaD learning centers, decentralized units of the HEI intended for the development of educational activities. Decree No. 12,456/2025 expressly prohibits the sharing of headquarters and EaD learning centers among different HEIs.

What the Studies Say About Quality and Accessibility

The enactment of Decree No. 12,456/2025 (Brasil, 2025a) and its complementary regulations, such as Ordinances No. 506/2025 and No. 2,539/2025 (Brasil, 2025b; 2025c), create a scenario of significant reconfiguration of EaD in Brazil, generating a clear tension between the pursuit of quality and the risk of excluding groups historically benefited by the flexibility of the modality.

The studies analyzed (Barletta, 2025; Cesario; Machado, 2025; Dias *et al.*, 2025; Malheiros, 2025; Silva; Ferreira, 2025; Souza *et al.*, 2025) converge in highlighting a favorable position toward the new regulation of EaD. Barletta (2025) states that Decree No. 12,456/2025 constitutes a fundamental advance and an indispensable step toward increasing academic rigor and breaking with the market logic and trivialization of automated education.

These measures are seen as reinforcing the recognition that the development of professional competencies requires an immersive articulation between theory and practice. The restrictions and the requirement for in-person and mediated synchronous activities reinforce the concern with the quality and safety of academic education.

Silva and Ferreira (2025) add that the detailed regulation seeks to ensure the quality and safety of academic education by strengthening the pedagogical bond. The new regulatory framework therefore marks a transition from a more permissive model to a stricter, more detailed, and more restrictive regulatory structure.

This pursuit of rigor, however, lies at the heart of the tension. Cesario and Machado (2025) and Dias *et al.* (2025) warn that the challenge lies in balancing quality and access. Although the decree represents a significant evolution in the effort to improve the quality of this form of education in Brazil, negative impacts must not be disregarded, such as reduced flexibility and the possibility of excluding vulnerable groups. The effectiveness of the blended model, which displaces fully distance education, requires investment in infrastructure, teacher qualification, and monitoring systems to prevent inclusion from becoming a source of new barriers.

CNPq Ordinance No. 2,539/2025 and the restrictions on Scientific Initiation in EaD

CNPq Ordinance No. 2,539, published on November 17, 2025, which establishes criteria and procedures for the implementation of CNPq Institutional Scientific and Technological Initiation Programs (PICT), introduces an element of radical restriction in the field of research. The Ordinance redefines the previous scenario, characterized by greater flexibility, by establishing stricter criteria for student participation. Explicitly, Article 10 of the Ordinance establishes that scholarships may not be awarded to students enrolled in programs offered through EaD. This prohibition affects Scientific Initiation (SI) and Technological Initiation (TI) scholarships and applies to the institutional scholarship programs:

- Institutional Scientific Initiation Scholarship Program (PIBIC);
- Institutional Scholarship Program for Initiation in Technological Development and Innovation (PIBITI);
- Institutional Scientific Initiation Scholarship Program in Affirmative Action (PIBIC-Af);
- Institutional Scientific Initiation Scholarship Program for Secondary Education (PIBIC-EM);
- Scientific Initiation and Master's Program (PICME);

and VI - Scientific Initiation Program of the Brazilian Public School Mathematics Olympiad (PIC-OBMEP) (Brasil, 2025c).

Through this measure, CNPq aligns itself with the perspective of Decree No. 12,456/2025, which prioritizes direct interaction and reinforces in-person participation, requiring in-person participation as an essential condition for training, continuous monitoring, and the integration of scholarship recipients into research groups (Brasil, 2025c). This requirement marks a regulatory shift from a more flexible model that allowed institutional adaptations to a more restrictive and standardized regulatory model, directly affecting opportunities for EaD students to participate in research and innovation activities and limiting their access to scientific and technological initiation programs.

Despite the rigor imposed on undergraduate education, CNPq Ordinance No. 2,539/2025 itself provides for a notable exception in the context of Secondary Education. Within PIC-OBMEP, it is permitted that

[...] scholarship students who reside in locations with difficult access to the Program's centers or who are unable to attend in-person meetings - as in the case of students serving socioeducational measures - may participate in the Program through distance education, in accordance with the PIC-OBMEP guidelines established by the Academic Coordination (Brasil, 2025c).

This distinction in regulatory treatment reinforces the central debate: if the regulations are intended to ensure quality, as Barletta (2025) argues, the prohibition of EaD models raises the question of whether regulatory rigor is acting punitively rather than inductively and cooperatively, as Malheiros (2025) advocates. The prohibition of SI scholarships for EaD undergraduates disregards the proven potential of the digital environment for the development of scientific thinking, increasing the risk of intensifying inequalities rather than mitigating them.

The PICT-EAD Case: Evidence of Quality and the Contradiction of the Prohibition

In this context of greater rigor, CNPq Ordinance No. 2,539/2025 introduced a restrictive element by requiring in-person participation as an essential condition for scientific training and prohibiting SI scholarships for students enrolled in EaD programs. This restriction directly contrasts with the experience of the Distance Scientific and Technological Initiation Program (PICT-EAD), the central subject of Bessa's thesis (2023).

PICT-EAD, a program linked to the Office of Research and *Stricto Sensu* Graduate Studies of the institutions in the Cogna Educacional group, was conceived from the need to adapt SI to the specific features of education mediated by digital technologies, breaking with the traditional model centered on individual in-person supervision.

The development trajectory of PICT-EaD demonstrates that EaD students' participation in scientific initiation activities is not a recent or isolated experience, but rather the result of an institutional process consolidated over the years.

According to Carvalho (2026),

[...] discussions about including scientific initiation in EaD had already been taking place at the institution since 2002, when the university's first SI program was created. However, the expansion of the modality and the growth in the number of students revealed limitations in the model initially adopted, especially with regard to large-scale supervision. In response to this scenario, a process of restructuring institutional scientific initiation began in 2015, culminating in 2019 in the implementation of PICT-EAD from a national perspective integrated across teaching, research, and extension (Carvalho, 2026, p.?).

In 2019, under the coordination of Professors Fátima Aparecida da Silva Dias and Diego Fogaça Carvalho, the project "The Education of Undergraduate Students in the Distance Higher Education System" (CAAE No. 24957219.0.0000.5161; Opinion No. 3,745,413) was approved by the Research Ethics Committee. PICT-EAD obtained approval for the research project "The Education of Undergraduate Students in the Distance Higher Education System" from the Ethics Committee under CAAE No. 24957219.0.0000.5161 and opinion No. 3745413, PICT-EAD. Following this approval, PICT-EAD then assumed a configuration directed toward research training through research experience. In this context, students participated in synchronous and asynchronous activities made available in a Virtual Learning Environment (VLE), covering topics such as research ethics, searches in scientific databases, academic production, the Lattes résumé, and the preparation of scientific papers, among others (Bessa, 2023).

Bessa (2023) describes PICT-EAD as an innovative program that sought to provide research training and research experience to undergraduate EaD students, with the aim of developing scientific thinking. As Figure 1 illustrates, throughout its editions the program underwent continuous updates, incorporating new teams, reorganizing communication flows, and expanding possibilities for supporting students. This movement reveals an ongoing process of pedagogical and technological reorganization sustained by the experiences of coordinators, supervisors, mentors, and future researchers.

Figure 1 - A brief history of PICT-EAD



Source: Bessa (2023).

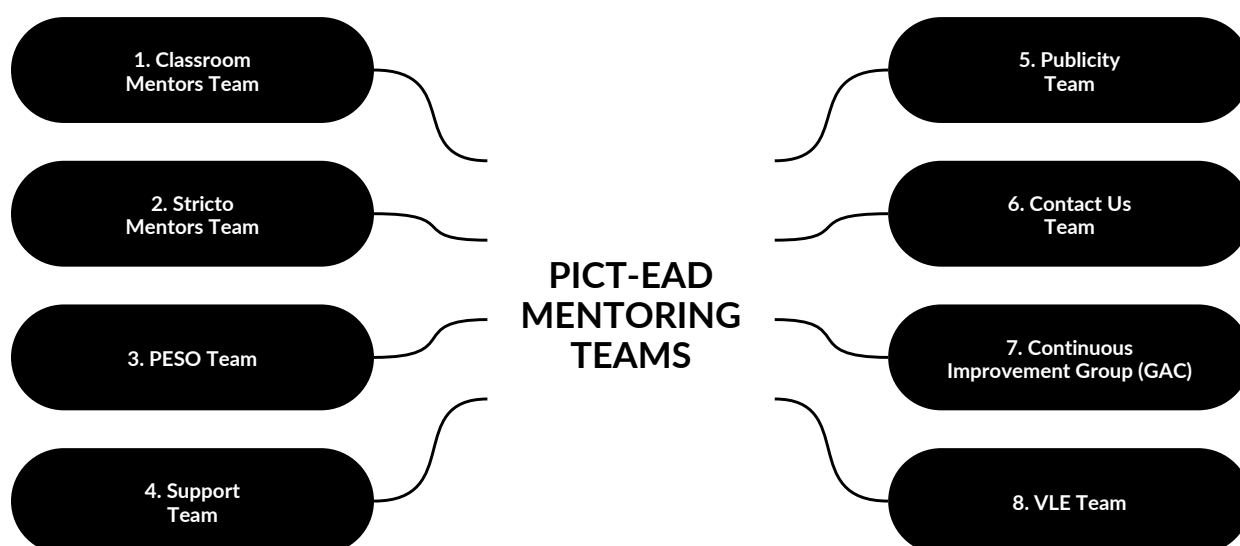
In addition to the individual activities carried out in the VLE, the program provided synchronous meetings mediated by supervisors and the coordination team through digital platforms such as Microsoft Teams, Google Meet, and live broadcasts on YouTube. These moments fostered interactions between students and faculty members, expanding spaces for dialogue and educational support throughout the path developed in the program. Thus, PICT-EAD had a multifaceted organizational structure supported by intensive technological mediation and by a collaborative

network composed of coordination staff, supervisors, undergraduate mentors, and graduate mentors (Martins; 2025, Carvalho; 2026).

As described by Bessa (2023) and Martins (2025), the students participating in the program were called Future Researchers (FRs) and organized into two groups: newcomers and veterans. Newcomers were students entering the program who had their first contact with scientific practice through introductory activities and less complex academic outputs. Veterans were students who had completed previous editions and continued to deepen their research and academic-scientific production experiences (Martins, 2025).

In 2020, the mentoring team was officially created, becoming one of the main operational and educational pillars of PICT-EAD. With progressive growth across editions, the team came to include volunteer mentors, scholarship recipients, and *stricto sensu* students organized into different areas of activity, such as virtual classroom mentoring, co-supervision, pedagogical support, publicity, VLE management, reception, and a continuous improvement group (Bessa; Dias; Carvalho, 2025; Carvalho, 2026). These teams, Figure 2, expanded the capacity to support participants and strengthened pedagogical mediation processes in EaD (Martins, 2025).

Figure 2: PICT-EAD Mentoring Teams.



Source: Martins (2025).

With regard to legislation, PICT-EAD complied with the constitutional principle of the inseparability of Teaching, Research, and Extension, established in Article 207 of the 1988 Constitution (Brasil, 1988), and fulfilled the provisions of the LDB (Brasil, 1996), which directs higher education to encourage research and scientific initiation. In addition, the program operated under the EaD regulatory framework, including Decree No. 9,057, of May 25, 2017, which regulates the LDB with regard to the modality, and CNE/CES Opinion No. 564 (Brasil, 2015), which establishes rules and guidelines for distance higher education programs.

Bessa's research (2023) provides evidence that SI, based on the constitutional principle of the inseparability of Teaching, Research, and Extension, is not only feasible, but highly effective in EaD, even for students with limitations on physical and temporal access (Bessa; Dias; Carvalho, 2025).

PICT-EAD became consolidated as an innovative, unprecedented, and original program that achieved quantitative growth and significant advances in technological resources and improvement of its mentoring team. The strengthening of the mentoring team is noteworthy; it was formed by students with outstanding participation in the program, some of whom began receiving scholarships to collaborate in activities supporting and accompanying future researchers.

Bessa's findings (2023) identify essential characteristics that ensure the quality of SI in the digital environment and that are consistent with the quality requirements of Decree 12,456/2025:

Qualified Pedagogical Mediation: PICT-EAD is based on pedagogical, affective, and operational mediation. The holding of approximately 2,000 synchronous meetings (*live sessions*, advising sessions, events) demonstrates the commitment to promoting dynamic and engaging education that goes beyond a merely transmissive logic.

Active Management and Curriculum: The program thrived because of active and participatory management capable of restructuring itself in each edition. PICT-EAD shows that a well-designed curriculum can translate complex requirements (such as research experience) into coherent and innovative practices in EaD.

Results in Retention and Education: Scientific education in PICT-EAD demonstrated the potential to strengthen research training and research experience, encouraging continuation of studies (master's/doctoral programs) and contributing to students' intellectual maturity.

5 Repeal of Article 10 of CNPq Ordinance No. 2,539/2025

Following intense pressure from HEIs, scientific associations, and parliamentarians, who denounced the exclusionary nature of the prohibition on SI scholarships for EaD students, Article 10 of CNPq Ordinance No. 2,539/2025 was repealed. In the meantime, the positive experience of PICT-EAD reaffirms the feasibility of research in digital environments and is frequently cited as evidence of the need for regulatory review.

In response to the criticism, on February 10, 2026, CNPq published Ordinance No. 2,634 (Brasil, 2026), which provides for changes to the criteria and procedures established for the implementation of CNPq PICT programs, restoring the eligibility of EaD students for institutional scholarship programs in accordance with the constitutional principle of the inseparability of teaching, research, and extension (Brasil, 1988; Bessa, 2023).

Art. 10. Scientific Initiation and Technological Initiation scholarships may be awarded to students regularly enrolled in undergraduate programs offered through in-person, blended, or distance modalities at public or private higher education institutions, provided that the following requirements are cumulatively met:

- the higher education institution is duly accredited and the program is recognized by the Ministry of Education;
- the institution demonstrates satisfactory performance in the official evaluation processes of the National Higher Education Evaluation System (Sinaes); III - the research project has proven academic merit and is linked to an institutionally established research group or line of research;
- the supervisor holds at least a doctoral degree and has scientific output compatible with the field of the project;

- legal restrictions concerning the provision of programs through distance education are observed, especially those established in Decree No. 12,456, of May 19, 2025;
- participation by HEIs and ICTs whose proposals have been approved through the Public Calls concerning the programs.

This repeal represented progress toward balancing academic rigor and inclusion by recognizing that scientific research can be conducted in hybrid and digital formats without loss of quality.

In this context, the repeal came to recognize the feasibility of investigative processes developed in hybrid and digital environments, following the transformations that have occurred in teaching, research, and academic education practices.

FINAL CONSIDERATIONS

The reconfiguration of EaD in Brazil, driven by Decree No. 12,456/2025 and its complementary regulations (Ordinances No. 506/2025 and No. 2,539/2025), establishes a new regulatory framework that seeks to balance the democratization of access with the assurance of quality and academic rigor in Higher Education. The new legislation formalizes the blended format and imposes restrictions in specific fields such as Law, Medicine, Nursing, Dentistry, and Psychology, while also requiring mandatory in-person assessments with predominant weight and adequate physical infrastructure.

The literature analyzed converges in emphasizing that this movement is a fundamental advance toward breaking with market logic and the trivialization of automated education, strengthening the pedagogical bond and the safety of academic education. However, this transition from a flexible model to a more rigorous structure that prioritizes in-person participation creates a notable tension between quality and access, warning of the possibility of excluding vulnerable groups. This tension is manifested dramatically in CNPq Ordinance No. 2,539/2025, which explicitly prohibits IC/TC scholarships for students enrolled in EaD programs and requires in-person participation as an essential condition for research training.

Institutional and political pressure resulted in the repeal of Article 10 of Ordinance No. 2,539/2025 through the publication of CNPq Ordinance No. 2,634/2026, which establishes the criteria and procedures for the implementation of CNPq Institutional Scientific and Technological Initiation Programs, restoring the eligibility of EaD students for SI and TI scholarships. This change represents significant progress by recognizing that academic rigor and inclusion are not mutually exclusive but complementary dimensions. In this sense, by reincluding EaD students in funding programs, CNPq reaffirmed the constitutional principle of the inseparability of teaching, research, and extension, ensuring that scientific education remains a right for all, regardless of the provision format.

Thus, the new EaD regulatory framework should be understood as a process under construction that requires a constant balance between quality and access. The PICT-EAD experience and the repeal of Article 10 of Ordinance No. 2,539/2025 show that pedagogical and technological innovation can sustain robust research practices in EaD, contributing to higher education that is more inclusive, equitable, and aligned with contemporary demands.

It should be emphasized that the main challenge in this reconfiguration process lies in implementing the new regulatory rigor without neglecting the inclusive potential and the capacity for quality research training that EaD has demonstrably offered, ensuring that quality requirements do not become new barriers to access.

Decree No. 12,456/2025 presents itself as the beginning of a funnel of restrictions on EaD. However, there is a risk that the funnel may become too narrow, restricting many people's access to higher education and wasting the research potential of EaD students, as demonstrated by PICT-EAD. Therefore, mechanisms must be created to incorporate the inclusive potential and the capacity for quality research training that the digital environment has already demonstrated, preventing excellence from becoming an inaccessible privilege.

The results observed in initiatives such as PICT-EAD show that EaD students can conduct consistent research activities and participate actively in the production of knowledge. In this sense, mechanisms must be developed to reconcile academic quality, inclusion, and expanded opportunities, recognizing the educational potential of digital environments and fostering the participation of diverse groups in teaching, research, and extension processes.

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