

Distance Education at SCC: Regular & Substantive Interaction

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Revised Direct Instruction language: Fall 2023

Who Should Read this Document

This document provides Academic Senate-led guidance developed by its Distance Education Subcommittee for faculty who teach online, whether it be only a portion or all of their course instruction in any given term. All distance education instruction time must include Regular and Substantive Interaction (RSI) as specified in this document. Because RSI is an academic and professional matter, the college's academic senate establishes these guidelines.

Introduction: Rationale

Communication Matters—Especially in Distance Education

Students depend on us as faculty subject-matter experts to help them learn the content of the courses we deliver. Our role as educators is to help them engage with our course subject matter and instructional materials, and state and federal regulators use the term Regular and Substantive Interaction (RSI) to gauge this student engagement.

Although good teaching practices naturally include RSI, this SCC Academic Senate document provides guidance outlining what effective RSI looks like in the online learning environment.

For ease of use, this document first provides specific graphic summaries of Regular Substantive Interaction recommendations, supported by a detailed explanation of the legal context and regulatory language¹. The Distance Education Committee recommends that you read the entire document for a comprehensive understanding of RSI (Regular Substantive Interaction) requirements.

¹ See appendix A for the specific policy language

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Summary of Specific RSI Regulatory Language

The following summary uses specific language from the Title 5 section 55204 to summarize the content of that section, which is included in its entirety in Appendix A.

Any portion of a course taught via the online modality must have RSI.

“Substantive Interaction” means faculty do at least 2 of the following [weekly]:

- (1) Providing direct instruction;
- (2) Assessing or providing feedback on a student’s coursework;
- (3) Providing information or responding to questions about the content of a course or competency;
- (4) Facilitating a group discussion regarding the content of a course or competency; or
- (5) Other instructional activities approved by the institution’s or program’s accrediting agency.

And, faculty ensure this by

- (1) Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
- (2) Monitoring the student’s academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.

In user-friendly language:

This is an even briefer summary in everyday language.

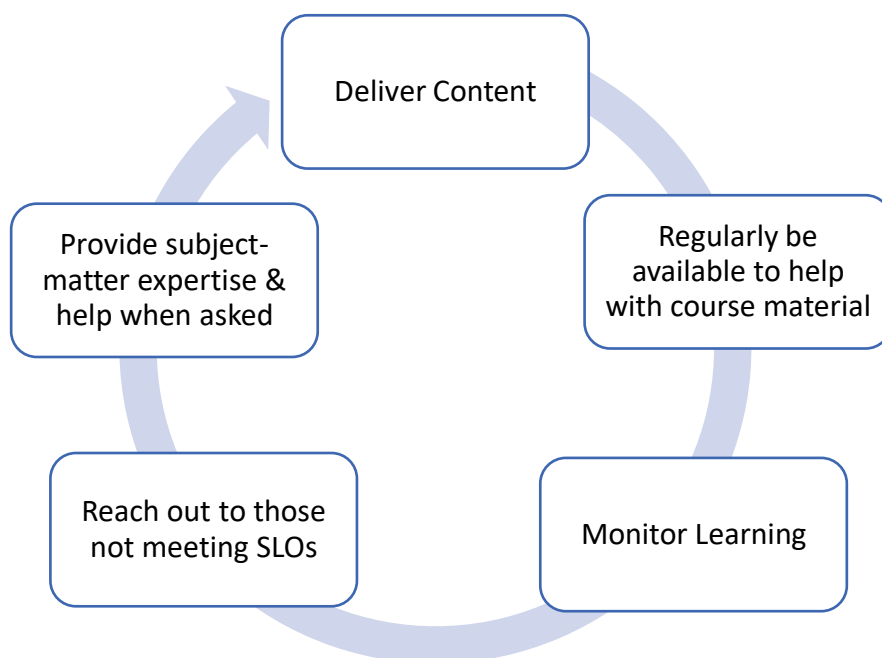
Weekly, do this for your students:

- **Deliver SLOs/course content**
- **Regularly be available in a scheduled time to help with course material and answer questions**
- **Monitor their success in learning course content**
- **Reach out to students you identify via monitoring and help them learn the SLOs/course content**

Answer student questions and help them with course content and subject matter

Figure 1: Weekly RSI Cycle

This is a visual description of the critical pieces that make up the new definition of RSI. It is presented as a weekly cycle to reflect the USDE language and the regular and recursive nature of the teaching process.



Suggested Methods: Faculty-Initiated RSI

There are multiple of ways courses can be designed to incorporate and demonstrate RSI and that faculty can use to meet the requirements.

Although Canvas is the primary online location where students and instructors interact, RSI can occur in other media as well such as email, Zoom, or in-person meetings in the field or on campus. RSI can and should be maintained through various methods such as but not limited to discussions, discussion boards, field trips, office hours, direct lecture, and assessment feedback. Instructors are encouraged to use all available means to communicate with students in efforts to establish regular and substantive communication channels through which the learning of course content and learning objectives can be supported.

Suggestions for Incorporating RSI into Online Courses

The table below offers suggestions for ways of achieving RSI in online courses. It is not a definitive or prescriptive list and is meant to provide a list of basic features of online instruction.

What	How	Where
Deliver SLOs/course content	Direct Instruction <ul style="list-style-type: none"> ○ Synchronous lecture or Instruction ○ Office Hours with Instruction 	Direct Instruction <ul style="list-style-type: none"> • Zoom or other synchronous conferencing tool
	Assessing or Providing Feedback on Student Work <ul style="list-style-type: none"> ○ Recorded video ○ Synchronous ○ Office Hours ○ Podcast ○ Written document 	Assessing & Providing Feedback <ul style="list-style-type: none"> • Info in Canvas pages • Synchronous Zoom • Speed Grader • Announcements • Email • 1-on-1 meetings
	Providing Info or Responding to Student Inquiry about Course Content <ul style="list-style-type: none"> ○ Discussion Board ○ Synchronous session ○ Office Hours 	Providing Info or Responding to Student Inquiry <ul style="list-style-type: none"> • Synchronous session • Announcements • Email • Video message • Discussion Board •
	Facilitating Group Discussion regarding Course Content <ul style="list-style-type: none"> ○ Discussion Board interactions ○ Office Hours ○ Feedback on overall student assessments 	Facilitating Group Discussion <ul style="list-style-type: none"> • Discussion boards • Synchronous session discussion • Small groups in Zoom breakouts
	Instruction in Other Instructional Activities such as field trips or clinical internships	Other Activities <ul style="list-style-type: none"> • On-site work instructing students • Demonstrations
Monitor student engagement	<ul style="list-style-type: none"> • Monitor assignment submissions • Monitor student engagement with Canvas content • Monitor Grades • Monitor student engagement in synchronous activities 	<ul style="list-style-type: none"> • Canvas gradebook • SpeedGrader • Course Analytics • People-tool Student interactions report
Follow-up based on engagement	<ul style="list-style-type: none"> • Reach out to individual students <ul style="list-style-type: none"> ○ Email ○ Phone call • Offer additional help • Refer to tutoring • Collaborate with tutoring • Contact counseling or other student service for additional support for student 	<ul style="list-style-type: none"> • Gradebook "Message Students Who..." • SpeedGrader comments/feedback • Inbox • Reach out to Jorge Alvarado via Starfish or email or phone

Regulatory Context: RSI as a Tool for Parity

In hybrid or fully online courses, ensuring that courses include Regular Substantive Interaction is meant to ensure the parity between on-ground and online courses. It's meant to guarantee that the student receives the benefit of the instructor's presence in the learning environment both as a provider of course content and as a facilitator of student learning.

Title 5 regulations specify that "any portion of a course conducted through distance education (DE) includes regular substantive interaction between instructor and students" (Title 5 Regulation Sect 55204).

The US Dept of Education's new definition of Distance Education and Regular Substantive Interaction became official in July of 2021 with California's Title 5 of the Ed Code following with parallel language in November of 2022.

The new RSI definition is much more specific than the prior language, outlining what "substantive" means and adding a requirement for monitoring student engagement and subsequent follow-up based on that monitoring. These changes create more of an instructional and student engagement cycle of instructional activities centered around course subject matter rather than a checklist of qualitative descriptions in the last definition.

Because RSI is an academic and professional matter, the college's academic senate establishes these guidelines.

Interpreting USDE Language: Excerpts from the Federal Register

While the new definition of Distance Education is clearer than the prior iteration from USDE, the language is open to some interpretation. The USDE provides helpful discussion in the Federal Register of feedback they received during the commentary period and any changes they made or didn't make in response, and this section includes those most relevant references to key pieces of the DE definition.

Direct Instruction (updated Fall 2023)

The US Department of Education (USDE) includes the term "direct instruction" in the definition of RSI but claimed in their Register they would not define it:

"we believe that it is beyond our purview to define the term 'instruction' given its broad application in postsecondary education and the restrictions on the Department's oversight of academic quality in the Dept of Education Organization Act" (p. 54757).

However, when pressed on the definition, they explained in a March 10, 2022 letter to WCET (WICHE Cooperative for Educational Technologies) that "when the Department uses the term 'direct instruction,' it means live, synchronous instruction where both the instructor and the student are online and in communication at the same time" (p. 5).

Direct instruction is therefore limited to an instructor's own synchronous, subject-matter expertise provided to students e.g., a lecture or demonstration via video or audioconferencing.

"Interactions"

The USDE has allowed for the fact that we cannot accurately measure the number of interactions between students and instructors when students are often passive and do not take advantage of our efforts to engage them. Thus, they consider *opportunities* for interactions:

"Given the variety of distance education programs, coursework, instructional modalities, and course schedules, we do not believe it is practical to offer a specific timeframe for regular interaction." The "requirement" is instead framed as "an 'opportunity' for interaction rather than a required interaction."

Although it's appealing to have a prescribed number of interactions to ensure compliance with the federal rule, the new definition relies on a recurrent cycle of opportunities for students to engage: faculty practices such as direct instruction, monitoring, and predictable opportunities for providing subject-matter expertise to students.

In this guidance, it's the instructional cycle itself and opportunities for engagement built into the design of the course that are recurring—not the individual interactions themselves.

Frequency of Interactions

The USDE tries to be specific without being prescriptive in their definition for the sake of encouraging institutions to avoid weekly obligatory assignments just for the sake of RSI. While they don't want institutions to include assignments just for the sake of meeting their definition of RSI, they do define a credit hour and a week of instructional time.

Credit hour

They define a credit hour as “one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately 15 weeks for one semester or trimester hour of credit, or the equivalent amount of work over a different period of time” (p. 54809). They also allow for other measurements to accommodate a variety of institutional configurations and options.

Week of Instructional Time

“A week of instructional time is any week in which—at least one day of regularly scheduled instruction or examinations occurs, or, after the last scheduled day of classes for a term or payment period, at least one day of study for final examinations occurs; or In a program offered using asynchronous coursework through distance education or correspondence courses, the institution makes available the instructional materials, other resources, and instructor support necessary for academic engagement and completion of course objectives; and In a program using asynchronous coursework through distance education, the institution expects enrolled students to perform educational activities demonstrating academic engagement during the week” (section 668.3 p. 54814).

In our situation, we expect students to be engaged every week of the term; therefore, it is expected that faculty shall arrange their courses so that students are somehow engaged in their coursework every week. This doesn't mean that course design dictates modules that must be set up weekly; however, it does mean that students must be engaged in their courses every week.

How those opportunities for engagement are structured are determined by the instructor. For example, instructors may have students working on projects that require some form of engagement during a week before the project is actually due to be submitted.

Scheduled and Predictable

Although the USDE is not specific about how institutions should track opportunities for interactions, it does specify that such interactions must be scheduled and predictable:

“An institution meets the requirement for regular interaction between students and instructors by, in part, providing the opportunity for substantive interactions with the student on a scheduled and predictable basis commensurate with the length of time and the amount of content in the course or competency. This requirement could be met if instructors made themselves available at a specific scheduled time and through a specific modality (e.g., an online chat or videoconference) for students to interact about the course material, regardless of whether students chose to make use of this opportunity or interact with the instructor at the scheduled time” (p. 54760).

While regularly scheduled office hours are an excellent way of providing scheduled and predictable opportunities for RSI, there are others such as field trips or instructor-facilitated study sessions. The critical factors in these opportunities for interaction are their regularity; they must be predictable and regular.

Monitoring

The USDE introduces the term “monitoring” to their definition, providing specific examples of what such monitoring could be:

“The requirement is intended to ensure that instructors are generally monitoring whether a student is engaged and successful throughout a given course or competency and takes appropriate action as needed. Such monitoring could include evaluating a student’s level of participation in synchronous class sessions, but it could also involve monitoring the student’s activity on course websites or materials; considering the quality of the student’s assignments or responses to questions about course materials; evaluating the level of understanding of course materials during conversations with instructors or performance on exams; or other forms of monitoring the student’s engagement and success in the course or competency” (p. 54757).

The specificity of monitoring and engaging adds depth to the definition of RSI, aligned with our equitable pedagogical practices that prioritize the learning of each student and our actions to support students when learning is not happening as expected.

Institution’s Obligation

Although this is beyond our scope of the academic senate, the USDE includes language that establishes expectations for institutions in the maintenance of RSI:

“An institution is expected to maintain academic policies or procedures that create expectations for faculty to substantively interact with students on predictable and scheduled basis and to monitor each student’s engagement and success and follow up with the student as needed” (p. 54759).

“The Department does not require an institution to monitor or document every interaction between an instructor and a student to demonstrate that it has fulfilled the requirements for RSI. However, we encourage institutions to consider whether they have adequate means of monitoring online programs to ensure that they continue to meet all the conditions of the definition. . . . the Department will determine whether an institution has established sufficient internal controls to demonstrate that it has established (1) appropriate academic policies and procedures for its instructors to implement these provisions; and (2) a system for monitoring or periodically evaluating its online programs to ensure that its instructors continue to observe such policies over time” (p. 54760).

This guidance from the Academic Senate exists within the larger contexts of LRCCD and the Los Rios Colleges Federated Teachers; see LRCCD policies and the current LRCFT-LRCCD contract for more information.

Online Labs: Reminder

All labs (on-ground or online) require faculty supervision, which means that students must have faculty guidance or intervention in order to complete tasks assigned in the lab (e.g., faculty help them navigate software or a specific activity that they cannot complete on their own). (If faculty intervention or guidance is not required, it is not lab work.)

Regardless, just as in an on-ground class, the expectation is that the faculty interacts with students on a regular and predictable basis and that students are interacting with others in some way if this is included on the course outline of record. For example, labs could be designed to include group projects, peer review, discussion boards, etc..

Campus Resources

Questions about the interpretation of this RSI guidance or the RSI language should be directed at the campus DE coordinator (Kandace.Knudson@scc.losrios.edu).

Appendix A: Associated Regulations:

A1. State Regulations

California Title 5 and the Distance Education Guidelines for the California Community Colleges (built on the Code of Federal Regulations definition section 600.2:

55204. Instructor Contact.

In addition to the requirements of section 55002 and any locally established requirements applicable to all courses, district governing boards shall ensure that:

- (a) Any portion of a course conducted through distance education includes regular and substantive interaction between the instructor(s) and students, (and among students if described in the course outline of record or distance education addendum), either synchronously or asynchronously, through group or individual meetings, orientation and review sessions, supplemental seminar or study sessions, field trips, library workshops, telephone contact, voice mail, e-mail, or other activities.
- (b) "Substantive interaction" means engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following:
 - 1. Providing direct instruction;
 - 2. Assessing or providing feedback on a student's coursework;
 - 3. Providing information or responding to questions about the content of a course or competency;
 - 4. Facilitating a group discussion regarding the content of a course or competency; or
 - 5. Other instructional activities approved by the institution's or program's accrediting agency.
- (c) Regular interaction between a student and instructor(s) is ensured by, prior to the student's completion of a course or competency:
 - (1) Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
 - (2) Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.
- (d) Regular and substantive interaction is an academic and professional matter pursuant to sections 53200 et seq.
- (e) For purposes of calculating instructional time in the context of asynchronous distance education, a week of instructional time is any week in which:
 - (1) The institution makes available the instructional materials, other resources, and instructor support necessary for academic engagement and completion of course objectives; and
 - (2) The institution expects enrolled students to perform educational activities demonstrating academic engagement during the week.

Note: Authority cited: Sections 66700 and 70901, Education Code. Reference: Sections 70901 and 70902, Education Code.; title 34 Code of Federal Regulations sections 600.2 and 668.3.

A3. LRCCD District Regulations

While no specific guidelines are provided by LRCCD's District Regulations in R-7145,² LRCCD Board Policies specify the requirement to have "regular substantive and effective contact):³

3.5 Any portion of a course conducted through distance education shall include regular substantive and effective faculty-initiated contact with students. The determination of regular substantive and effective contact is an academic and professional matter. (34 C.F.R. § 602.3; Title 5, § 55204, subd. (a))

² Reviewed at <https://losrios.edu/docs/lrccd/board/regulations/R-7145.pdf>

³ Retrieved from <https://losrios.edu/docs/lrccd/board/policies/P-7145.pdf>

Figure A: Graphic summary of RSI

