San Joaquin Delta College
Academic Senate Resolution: Regular and Substantive Interaction for Online and Hybrid Courses

Proposed by the Distance Education Committee

Whereas, new Title 5 regulations went into effect in July 2021 that changed "Regular Effective Contact" to "Regular and Substantive Interaction," bringing Instructor Contact requirements into alignment with existing Federal Regulation, and, CCCCO Guidance stipulates that colleges shall review local policies and practices to make appropriate updates to comply with these regulations. Since Regular and Substantive Interaction was declared an academic and professional matter, updates to local policies and documentation must include demonstration of collegial consultation with the Academic Senate; and

Whereas, the Academic Senate approved a resolution on Regular and Effective Contact for Online Courses in April 2019;

Whereas, the Academic Senate approved adoption of the CVC-OEI Course Design Rubric in Spring 2018 which includes recommendations about instructor-to-student and student-to-student interaction; and

Whereas, accreditation teams will be looking for evidence that colleges have defined, documented, and are following a process to ensure substantive interaction;

Therefore, be it resolved that the SJDC Academic Senate supports adopting the attached Regular and Substantive Interaction Guidelines for Online and Hybrid Courses; and

Therefore, be it further resolved that the SJDC Distance Education Committee include these guidelines in the DE Faculty Handbook.

Regular and Substantive Interaction Guidelines for Online and Hybrid Courses, Fall 2023

Part 1: Regulatory Requirements

Department of Education (Federal)

The USDE defines the following, under the *Code of Federal Regulations, Title 34, 600.2*

Distance Education:

Using one or more [technologies, including the Internet] to deliver instruction to students who are separated from the instructor and to support *regular and substantive interaction* between the students and the instructor, either synchronously or asynchronously.

Regular and Substantive Interaction:

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.

Regular interaction between a student and instructor 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.

As part of interaction, “Academic Engagement” is also defined under CFR, Title 34, §600.2

Title 5 (State)

As of July 2021, Title 5 states that *any* portion of instruction provided through Distance Education is required to have *Regular and Substantive Interaction* between the instructor and students and follows the same definitions used by the USDE.
Title 5 CCR § 55204

Accreditation Requirements

For the purpose of accreditation review, the ACCJC uses the same definitions of Distance Education and Regular and Substantive Interaction as both Federal and State law - CFR, Title 34, §600.2 and Title 5 CCR § 55204, respectively. Accreditation teams will be looking for evidence that colleges have defined, documented, and are following a process to ensure substantive interaction between instructors and students.
ACCJC Policy on Distance Education and on Correspondence Education, 2021

Title IV / Financial Aid

The U.S. Department of Education requires that all online courses for which students may use Title IV funds (federal financial aid) ensure that there is regular substantive interaction between students and instructors. The Department of Education has the authority to review distance learning offerings at institutions that receive federal funds.

Part 2: Guidance, Local Requirements, and Support

Chancellor’s Office Guidance

CCCCO Guidance details the responsibility of district governing boards to ensure substantive interaction between instructors and students. Colleges

shall review local policies and practices to make appropriate updates to comply with the regulations. Institutions are strongly encouraged to create inclusive and engaging online environments that empower learning and foster a sense of unconditional belonging and agency for students. *CCCCO Guidance Memorandum for DE Regulation Changes, April 18, 2023*

SJDC Administrative Procedure

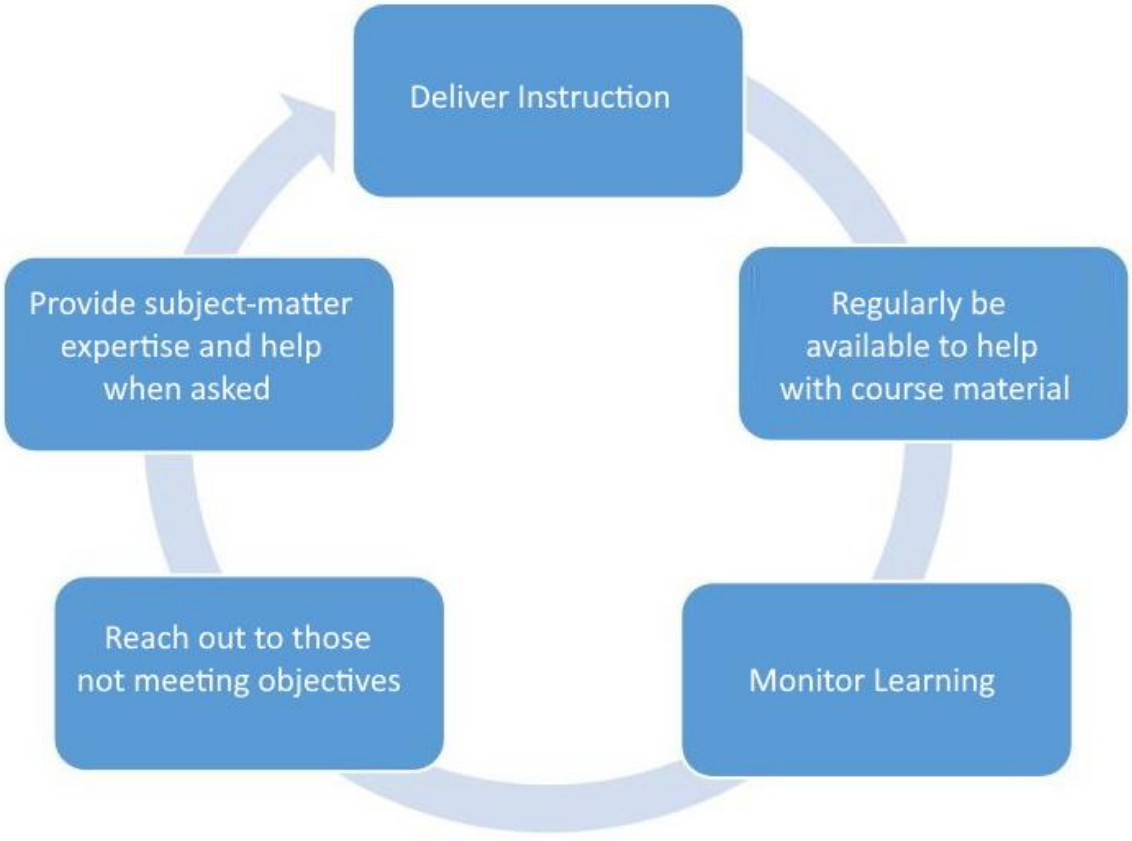
In December 2022, the Academic Senate approved updates to *AP 4110 on Distance Education* to include the following language, based on the current Federal and State definitions of Regular and Substantive Interaction:

> As distinct from correspondence courses, all distance education courses are required to maintain regular substantive interaction between the professor and students, in accordance with Title V. Regular substantive interaction is defined as engaging students in teaching, learning, and assessment, consistent with the content under discussion.
>
> Types of Interaction. Instructors will use a variety of means to initiate substantive and effective interactions with students, including at least two from among the following:
>
> - Providing information or responding to questions about the content of a course or competency.
> - Assessing and providing feedback on a student's coursework, separate from or in addition to an automated grading system.
> - Facilitating group discussions regarding the content of a course or competency.
> - Providing direct instruction, such as instructor-prepared synchronous or recorded lectures, or introductions to educational resources such as publisher-created materials or Open Educational Resources.
> - Other instructional activities approved by the District's accrediting institution.
>
> This contact shall be distributed in a manner that ensures regular instructor/student contact is maintained over the course of a week and the duration of the term and should occur as often as is

appropriate for the course section. The opportunities for instructor/student interactions are to be regular predictable and scheduled.

Instructors are expected to monitor the students' academic engagement and success and promptly and proactively engage in substantive interactions with the students when needed, on the basis of such monitoring, or upon request by the student.

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 regulatory language and the regular and recursive nature of the teaching process.



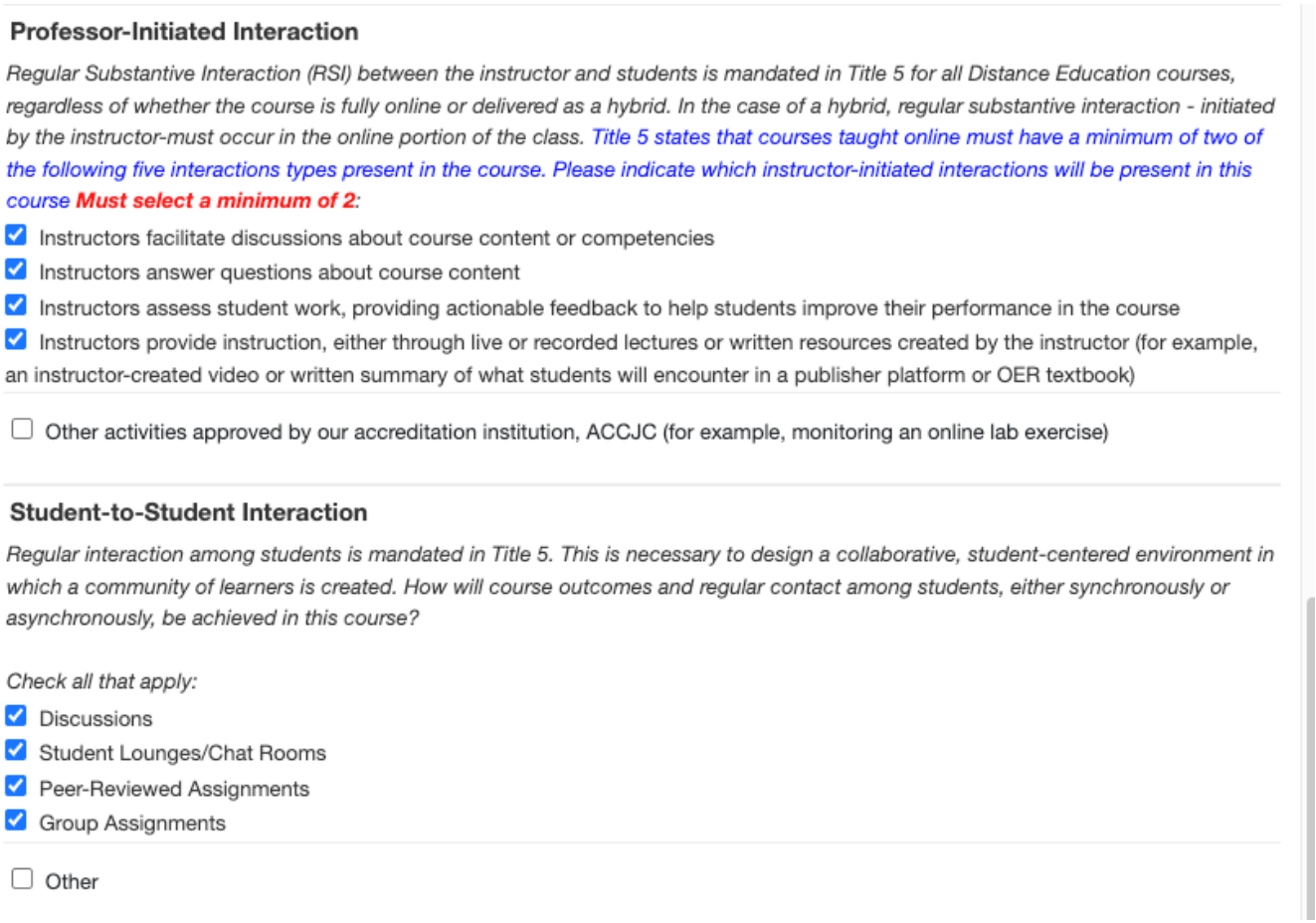
Adapted with permission from Sacramento City College, 4/19/2023

Interaction among Students. The frequency of student-to-student contact in a distance education course will be at least the same as would be established in its face-to-face counterpart.

Documentation of distance education specifications will be reviewed whenever the course comes up for regular curricular review. The Distance Education Committee Chair and designees will participate in the curricular review of distance education courses.

Curriqunet / Curriculum Approval Process

When faculty update or create a new online or hybrid course in Curriqunet, they are given a set of choices and prompted to select the different ways in which Professor-Initiated interaction and Student-to-Student interaction will be achieved. The selections made should be reflected in the course assignments and outcomes.



Professor-Initiated Interaction

Regular Substantive Interaction (RSI) between the instructor and students is mandated in Title 5 for all Distance Education courses, regardless of whether the course is fully online or delivered as a hybrid. In the case of a hybrid, regular substantive interaction - initiated by the instructor-must occur in the online portion of the class. Title 5 states that courses taught online must have a minimum of two of the following five interactions types present in the course. Please indicate which instructor-initiated interactions will be present in this course ***Must select a minimum of 2****:*

- [x] Instructors facilitate discussions about course content or competencies
- [x] Instructors answer questions about course content
- [x] Instructors assess student work, providing actionable feedback to help students improve their performance in the course
- [x] Instructors provide instruction, either through live or recorded lectures or written resources created by the instructor (for example, an instructor-created video or written summary of what students will encounter in a publisher platform or OER textbook)
- [ ] Other activities approved by our accreditation institution, ACCJC (for example, monitoring an online lab exercise)

Student-to-Student Interaction

Regular interaction among students is mandated in Title 5. This is necessary to design a collaborative, student-centered environment in which a community of learners is created. How will course outcomes and regular contact among students, either synchronously or asynchronously, be achieved in this course?

Check all that apply:

- [x] Discussions
- [x] Student Lounges/Chat Rooms
- [x] Peer-Reviewed Assignments
- [x] Group Assignments
- [ ] Other

SJDC Distance Education Handbook

In 2023, the SJDC Distance Education Handbook was updated to align to the same definitions as in AP 4110, Title 5, and the USDE. *In addition:* The DE Committee recommends that instructors quantify contact that happens outside the classroom by including language in the Syllabus or Introductory module that covers on-campus office hours, phone calls, Skype or any other method of contact that's outside the Canvas shell. This lets students and reviewers know where and how often contact will be happening in the course.
Further examples of RSI can be found in the *DE Handbook*

CVC-OEI Course Design Rubric and Peer Online Course Review

On February 21, 2018, the SJDC Academic Senate voted unanimously to adopt the OEI Course Design Rubric. This rubric was developed by Distance Learning professionals across the CCC system to promote student success and meet existing regulatory and accreditation requirements. Many CCCs currently use the rubric as a widely accepted model for online course design and Peer Online Course Review (POCR). The Professional Development Center has been actively training faculty on the rubric since 2019. In 2022, the college was awarded certification by the Statewide California Virtual Campus for SJDC's POCR program, which promotes alignment of online courses to the rubric.

The rubric includes six (6) standards for Interaction:

1. Pre-Course Contact
2. Regular Effective Contact
3. Student-Initiated Contact with Instructor
4. Student-Initiated Contact with Other Students
5. Regular Effective Contact Among Students
6. Participation Levels

Training on Regular Substantive Interaction

The Professional Development Center will offer an updated faculty training course on RSI beginning in Fall 2023. It will include an outline of the Federal, State, and Local requirements around RSI, as well as what effective interaction looks like in online and hybrid classes. Faculty are encouraged to participate in training for a more comprehensive understanding of RSI at all levels.