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PREFACE FOR DECEMBER SENATE VOTE:

Regular and Substantive Interaction (RSI) refers to a regulatory requirement in U.S. higher education which mandates consistent and meaningful engagement between instructors and students in online learning environments. This interaction, which must be academically focused and initiated by instructors, differentiates self-paced courses and instructor-led online courses, impacting federal financial aid eligibility for institutions. Our district then develops its own Regular and Substantive Interaction (RSI) documents to establish clear, localized guidelines and protocols that are—hopefully—useful to instructors. In December 2023 this revised document will come to Senate for approval.

For comparison purposes, the prior document is on the OTLC page at grossmont.edu/faculty-staff/canvas/_resources/assets/pdf/gc-rsi-rev-11-2020.pdf. This outdated draft no longer reflects current Ed Code and had been cobbled together through many years (2011, 2018, 2020). It was not an instructor-facing document and is a bit challenging to navigate, so it has been fully revised and we are proud of the new flexible, helpful, and up-to-date RSI policy. The new version that follows is the result of months of revision; it has been through many hours of word-smithing with a district-wide subgroup including our DE and OE coordinators and instructional design specialists. It has also gone through multiple revisions at both colleges' Online Teaching and Learning Committees.

PROPOSED POLICY: GCCCD Policy on Regular and Substantive Interaction in Online Courses

Purpose and Scope

Per the faculty contract, “for all courses offering online components there shall be regular and effective contact between the faculty member and the students as required by Title 5, Accreditation and GCCCD Standards” (§ Article 7, Section 18.1).

The purpose of this policy is to ensure regular and substantive interaction in online courses, reflecting our commitment to student success and compliance with federal and state regulations. This policy utilizes the guidelines set forth by the Online Education Initiative (OEI) Course Design Rubric.

Background on Regular and Substantive Interaction (RSI):

Regular and Substantive Interaction (RSI) between students and instructors is a foundational principle of quality distance education. This concept has its roots in federal regulations and has been further refined by state-level regulations.

U.S. Department of Education (USDE) [Definition and Guidance](#):

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The U.S. Department of Education emphasizes the importance of RSI in its distance education regulations. According to the USDE, for a course to be considered distance education (as opposed to correspondence education), it must demonstrate:

- **Regular Interaction:** The institution must have a plan to initiate interaction between the instructor and students, with the instructor being proactive in engaging students.
- **Substantive Interaction:** Interactions must be academic in nature, directly related to the course, and meaningful in terms of supporting student learning.

The Department's distinction between distance and correspondence education hinges on this principle of RSI. Distance education involves a more rigorous and interactive learning experience, while correspondence courses often lack robust instructor-student engagement.

California Codes of Regulations on RSI:

The California Code of Regulations (Title 5) stipulates that:

- Any portion of a course conducted through distance education must include regular, effective contact between instructor and students, synchronous or asynchronous (see appendix Title 5 Section 55200).
- Institutions offering online courses should have a clear policy stating the nature and frequency of interactions. This policy should ensure that the instructor is initiating substantive interactions, which must be frequent enough to maintain course quality, equivalency to face-to-face courses, and rigor (see appendix Title 5 Section 55204).

Definitions:

- **Regular Interaction:** Ongoing, consistent communication between instructor and student throughout the duration of the course (see appendix Title 5 Section 55204).
- **Substantive Interaction:** Interaction that is relevant and contributes to learning and comprehension of course content (see appendix Title 5 Section 55204).

Policy Requirements:

Frequency of Interaction:

- Instructors must interact with students on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency.
- Interactions should occur at least weekly, or more frequently depending on course content, assignments, and student needs (see menu of options for interaction below).

Clear Course Policies:

- Courses include clear guidelines on how, where, and when students can expect to interact with their instructors, including an expected response time.
- The syllabus includes grading policies, attendance/drop policies, and expectations for participation in the course.

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Types of Interaction:

- Below are some examples of RSI methods. Instructors should use a combination of these methods most appropriate to the discipline and course. It's important to note that some forms of RSI (such as Canvas Inbox messages, emails, and Zoom meetings scheduled outside of Canvas) will not be visible to evaluators or accreditors.

Announcements:

- Regularly (at least once per week) post updates, insights, or reminders pertaining to course content, fostering continuous engagement.
- Post an announcement to clarify a sticky concept or summarize student feedback results.

Discussion Boards:

- Facilitate discussion threads tied to course material.
- Pose open-ended questions to promote deeper thought and robust student participation.
- Offer feedback on student contributions to enhance discussion depth.

Feedback on Assignments:

- Utilize Canvas's SpeedGrader features (i.e., annotation tools, summary comment, rubrics, audio/video feedback) to deliver meaningful, constructive feedback on student submissions.

Messaging:

- Dispatch periodic messages to students, inquiring about their progress or challenges. This can be done using the "Message students who..." feature in Canvas's Gradebook, Canvas Inbox, phone contact, or email.
- Promptly address student inquiries.

Regular Check-ins & Student Feedback:

- Schedule/assign consistent check-ins (based on length of course) using quizzes, assignments, or survey tools to gauge student understanding, well-being, or any concerns; react to feedback from these check-ins, tailoring instruction or offering support as needed.
- Develop surveys to collect student feedback regarding course design, instructor presence, and course content/activities; react to feedback from these check-ins, tailoring instruction or offering support as needed.

Peer Review:

- Leverage peer review, enabling student feedback on peers' work, and monitor these interactions, offering guidance or clarification as necessary.

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Office Hours/Synchronous Student Contact:

- Advertise and conduct virtual office hours, review sessions, orientation sessions, or optional synchronous sessions to clarify concepts

Group Projects and Collaborations:

- Delegate group tasks (i.e., using Canvas Groups, Wiki pages, shared documents, etc); periodically monitor group progress, providing direction or feedback.

Guided Journals or Reflections:

- Encourage students to keep a course journal or periodic reflections on Canvas, guided by specific prompts, and review these entries, fostering deeper personal content engagement.

Quality of Interaction:

- Interactions are meaningful and relevant to the course content.
- Responses to student inquiries are timely, informative, and positively contribute to the student's learning experience.

Feedback and Assessment:

- Instructors provide timely and constructive feedback on assignments, exams, and projects.
- Feedback is detailed and assists students in understanding areas of strength and areas needing improvement.

Inclusive and Accessible Interaction:

- Interactions are accessible to all students, including those with disabilities.
- Instructors apply universal design principles and ensure that their modes of interaction are inclusive.

Use of Technology:

- Instructors utilize the various tools and technologies available on the learning management system to facilitate interaction.
- Where appropriate, external tools that enhance interaction can be integrated, ensuring they meet accessibility standards.

Policy Review: The Grossmont and Cuyamaca Distance Education Coordinators and Instructional Design Technology Specialists will review this policy annually to ensure its relevance, effectiveness, and alignment with state regulations and the evolving standards of online education.

Approval and Amendments: Changes or amendments to this policy can be made with the approval of OTLC and Academic Senate.

Date of Implementation: _____

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Appendix

Federal Regulations

[US Department of Education Title 34, Subtitle B, Chapter VI, Part 600:](#)

Distance education:

- (1) Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.
- (2) The technologies that may be used to offer distance education include—
 - i) The internet;
 - ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
 - iii) Audio conference; or
 - iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (2)(i) through (iii) of this definition.
- (3) For purposes of this definition, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution's accrediting agency.
- (4) For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following—
 - (i) Providing direct instruction;
 - (ii) Assessing or providing feedback on a student's coursework;
 - (iii) Providing information or responding to questions about the content of a course or competency;
 - (iv) Facilitating a group discussion regarding the content of a course or competency; or
 - (v) Other instructional activities approved by the institution's or program's accrediting agency.
- (5) An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student's completion of a course or competency—
 - (i) 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
 - (ii) 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.

California Regulations

[Title 5 Section 55200](#)

- (a) “Distance education” means education that uses one or more of the technologies listed below to deliver instruction to students who are separated from the instructor(s) and to support regular and substantive interaction between the students and instructor(s) either synchronously or asynchronously. Technologies that may be used to offer distance education include:
 - (1) The internet;
 - (2) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
 - (3) Audio conference; or
 - (4) Other media used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3) of this subdivision.
- (b) The definition of “distance education” does not include correspondence courses.
- (c) “Accessible” means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally and independently as a person without a disability. Although this might not result in identical ease of use compared to that of persons without disabilities, it still must ensure equal opportunity to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology.

[Title 5 Section 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;

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- (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.

OEI Rubric

The [OEI Online Course Design Rubric](#) devotes a section to communication, including regular effective contact.