Guidelines for Instructor Presence in Distance Education Courses

WVC Policy on Regular and Substantive Instructor-initiated Interaction

Ensuring meaningful interaction among students and between students and the instructor should be a priority for any modality, be it face-to-face or distance education (DE) classes. For DE classes, this means regular and substantive interaction (US Dept. of Education; ACCJC) or regular effective contact (Title V, section 55204). Basically this means that all DE courses must include regular, effective, substantive and engaged interaction between the instructor and students.

A reminder! Distance education is NOT correspondence education. Distance education involves regular and substantive interaction, with due dates for assignments/assessments throughout the term of the course. In contrast, in correspondence education, interaction between the instructor and students is limited and primarily initiated by the student, and the course is self-paced.

Background

The term "regular and substantive interaction" (RSI) originates from 2005 guidelines for federal funding eligibility of correspondence courses versus distance education courses. In 2008, Congress included the regular and substantive requirement as part of its definition of distance education (Higher Education Opportunity Act), thereby creating a federal aid policy distinction between correspondence and distance education programs.

Actions and communications by the U.S. Department of Education have demonstrated the importance of regular and substantive interaction, and clarified the intent and expectations for compliance of RSI:

- 2011 U.S. Department of Education audit of distance learning courses at St. Mary-of-the-Woods College found lack of interaction. Result was a recommendation of return of $42 million in federal aid (issue remains unresolved.
- 2014 Dear Colleague letter which states, "Interaction that occurs only upon the request of the student (either electronically or otherwise) would not be considered regular and substantive interaction." (IFAP 2014)
- 2017 Education Department Office of Inspector General audit found most courses offered by the Western Governors University failed to meet the "regular and substantive interaction" standard. Result was recommended payback of $713 million in federal aid.

Regulations

Distance Education Guidelines for California Community Colleges

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 effective contact between instructor and students, through group or individual meetings, orientation and review sessions, supplemental seminar or study sessions, field trips, library workshops, telephone contact, correspondence, voice mail, e-mail, or other activities. Regular effective contact is an academic and professional matter pursuant to sections 53200 et seq.

b. Any portion of a course provided through distance education is conducted consistent with guidelines issued by the Chancellor pursuant to section 409 of the Procedures and Standing Orders of the Board of Governors.

Higher Education Act of 1965/Higher Education Opportunity Act of 2008

Distance education is education that uses one or more technologies, which are specified in the definition, to deliver education 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.

WVC Policy

All DE courses at WVC, whether hybrid or fully online, will include regular and substantive interaction based on the following three criteria:

1. Interaction must be *initiated by the instructor*. Based on the Distance Education Guidelines (2008) published by the CCC Chancellor's Office, the DE instructor is responsible for initiating regular contact with students to verify their participation and performance. Note that responding to queries from students alone does NOT meet this criterion.

2. Interaction must be *regular and frequent*. At a minimum, the number of instructor contact hours per week that would be available to face-to-face students must also be available to students in a DE class.

3. Interaction must be *substantive*, i.e., of an academic nature, whereby the interaction furthers learning or assesses learning, rather than being organizational or procedural communications.

The college recommends that faculty teaching hybrid or online courses regularly engage in coursework, workshops or other professional development activities to remain current in online pedagogy, online best practices, and use of technologies.

Examples of Regular and Substantive Interaction

Examples of RSI include, but are not limited to:

- Instructor-guided introductions and modeling of netiquette at the beginning of the semester.
- Threaded discussion forums with regular and appropriate Instructor participation based on course topic or specific content. For example, instructor posting follow-up questions (as replies); links and/or comments to guide the discussion.
- Using the LMS tools, monitoring of student interaction and activity to ensure students are actively engaged in the course.
- Instructor-prepared instructional materials (for ex., PowerPoints, videos, podcasts, documents and other forms for delivery of course content); do NOT rely only on publisher content.

- Video or audio feedback by the instructor on assignments and/or students' progress in the course.
- Regular announcements posted in the class. For ex., Monday morning announcement or email with highlights or goals for the week.
- Regular, timely and appropriate feedback and evaluations of student work and/or progress in the course.
- Virtual office hours in real time, such as chat, during announced set days/times.
- A communication plan (located in the syllabus at a minimum) that informs students of the best means of communicating with the instructor, and which identifies the response time for student queries and grading/feedback on assignments
- Establish guidelines for frequency of contact by instructor and define what interactions students can expect each week.
- Use of rubrics in assessing grades for assignments.
- Asking students for feedback about the course on a regular basis, and revising content as needed to address issues identified

Sources

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