

REGULAR AND SUBSTANTIVE INTERACTION

AN INSTRUCTIONAL DESIGN APPROACH TOWARD
COMPLIANCE

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MY PERSPECTIVE

- Community college background (non-union faculty).
- Worn almost every hat in the distance learning world.
- Supported faculty and students for almost 25 years.
- Enjoyed extensive collaboration among all Florida colleges and universities.
- Taught FYE online and hybrid.



BACKGROUND

- RSI has been part of the distinction between a DL/Correspondence course and fundable/not fundable.
- There are other factors in that distinction but we are primarily discussing RSI.
- Brought to the forefront because of an audit of Western Governors' University.
- Part of a wide-ranging negotiated rulemaking process.
- This current version represents a vast improvement in clarity.
- RSIs are course delivery/teaching behaviors.

BASELINE INFO

- The institution is specifically responsible for the process, faculty are responsible for the implementation:
 - “(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—”

(Distance Education and Innovation, 2020, pg. 54809)
- This version of regulation is very new and has not been subject to audits, accreditation reviews etc.
- The information in this presentation is based on my understanding of the Federal Register, communication with individuals on the rulemaking committee and following leading blogs such as WCET Frontiers.
- As time goes on, our collective understanding of these rules will be refined.
- I initiated this project with Jennifer Veloff, formerly of Pasco Hernando State College, now with Cisco Systems.

WHAT THIS IS **NOT** SAYING

- That we must do anything we shouldn't have already been doing.
- Faculty members must change the way they teach.
- Teaching methods that do not meet the definition of RSI must be abandoned.

WHAT THIS **IS** SAYING

- Oversimplified: The institution must ensure that the faculty member of record is actually teaching students and in the modality they say they are.
 - It's far more complicated than this so, let's dive in.

QUESTIONS I MAY NOT BE ABLE TO FULLY ANSWER

- RSI and Hybrid: My interpretation is that the online portion of a hybrid should include RSI.
- Enforcement: Likely through a combination of accreditation and complaint.
- Regional accreditor response: New rule seems to be welcomed.
- How often is often enough? I look at the organizational structure of the course.

KEY ELEMENTS OF NEW REG:AT LIGHTNING SPEED

In determining whether or not an institution meets the standard, the department will focus on five elements:

1. The institution's online instruction is delivered through an **appropriate form of media**;
2. The instructors with whom students **regularly and substantively** interact meet the **requirements** of the institution's accrediting agency for instruction in the subject matter;
3. Instructors engage in at least **two forms** of substantive interaction meeting the regulatory requirements for the course or competency;
4. The institution has established **scheduled and predictable** opportunities for substantive interaction between students and instructors and create expectations for instructors to **monitor** each student's engagement and substantively engage with students on the basis of that monitoring; and
5. Instructors are **responsive** to students' requests for instructional support.

(Distance Education and Innovation, 2020, pg. 54760)

APPROPRIATE FORM OF MEDIA

- For almost everyone:
 - LMS and/or
 - Live conferencing such as Zoom or Teams
- Many other forms allowed.

INSTRUCTOR

- “requirements of the institution's accrediting agency for instruction in the subject matter...”
 - Credentialed faculty member, not TA.
 - Does not mean a TA cannot participate in the course but RSI teaching behaviors must be the “instructor.” (Distance Education and Innovation, 2020, pg. 54756)
- Opportunity for self-reflection:
 - What value does the faculty member add to the course delivery?

REGULAR

- “(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.” (Distance Education and Innovation, 2020, pg. 54809)

SUBSTANTIVE

“...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.”

(Distance Education and Innovation, 2020, pg. 54809)



SCHEDULED AND PREDICTABLE

- Think syllabus, course outline, modules, assignment timeline etc.
- Commensurate with length of course pg. 54809
- Applied at “course or competency level” pg. 54758-59
- Example: “You can expect feedback on weekly assignments one week from due date.” or “My goal is to respond to 20 – 30 percent of discussion posts, which are due on Wednesdays, each week.”
- Not student initiated.
- Office hours appear to qualify: “...instructors made themselves available at a specific scheduled time and through a specific modality ... regardless of whether the students chose to make use of this opportunity...”
 - Distance Education and Innovation, 2020, pg. 54760

MONITORING STUDENT PROGRESS

- First thought is “big data” software. This can be a piece of the strategy but is not required.
- “Instructors are generally monitoring whether a student is engaged and successful throughout a given course or competency and takes appropriate action as needed.”
- Evaluating a student's level of participation...
- Monitoring the student's activity on course websites or materials.
- Considering the quality of the student's work.
- Evaluating the level of the student's understanding of course materials during conversations with instructors.
- Evaluating student performance on assignments.

Distance Education and Innovation, 2020, pg. 54757

STRATEGIES TO HELP FACULTY COMPLY

- Encourage an institution-wide policy/procedure/best practice.
- Put faculty at ease.
 - Reassure them that this regulation does not invalidate their current instructional practices.
 - Help them recognize how their current practice fits into the regulation.
- Train them.
- Provide them with a reusable planning tool.
- Document compliance with the regulation but aspire to design excellence.

SCENARIO: RECORDED VIDEO LECTURES

- A faculty member records a video lecture and reuses it term after term, for several years. Does this qualify as RSI?
- A faculty member records a fresh video each term. Does this qualify as RSI?
- A faculty member uses PlayPosit or a similar system requiring students to interact with the video. Does this qualify as RSI?
- A faculty member provides feedback to students on their responses and generalized feedback to the entire course, addressing common misconceptions from the assignment. Does this qualify as RSI?

SOME PRACTICAL NUANCE

- A faculty member pre-records a video which includes several interactive components, such as quiz questions and reflection opportunities. The faculty member gives direct feedback to students via an assignment rubric and corrects common misconceptions to the class via a weekly debrief announcement in the LMS.

Are they:

- A. Providing direct instruction?
- B. Assessing or providing feedback on a student's coursework?
- C. Providing information or responding to questions about the content of a course or competency?
- D. Facilitating a group discussion regarding the content of a course or competency?

INSTITUTIONAL APPROACHES

-ALL SHOULD INVOLVE TRAINING

- Instructional Design
 - Benefit of documenting intention to comply.
 - Draw-back of not documenting actual compliance.
- Faculty Self-evaluation
 - Benefit of being less intrusive into the teaching environment.
 - Draw-back of not including a 3rd party to verify.
- Instructional Evaluation
 - Benefit of documenting compliance after the fact by 3rd party.
 - Draw-back of evaluators access to interactions in LMS.
- Student End-of-Course Evaluations
 - Benefit of student perspective on faculty interactions.
 - Draw-back of getting students to quantify interactions in a way relatable to regulation.

CURRENT PRACTICE AT COLLEGE OF CENTRAL FLORIDA

- Faculty trained on RSI.
- Complete “planning/design” worksheet on all aspects of distance learning definition with emphasis on RSI.
- Worksheet stored for documentation.
- Interaction reviewed as part of the quality course review process.

WORKSHEET

Section 3: Substantive Interaction

For each type of interaction that applies to your course, provide detail explaining the specific activities that you believe fit into each category. Also state where scheduled interactions and your expectations of yourself are communicated to the student. For instance, if you engage the students through providing feedback each week and that is communicated in the syllabus, please state such in this section.

Providing Direct Instruction (live):

Assessing and providing feedback on a student's coursework (AI and auto grading/feedback do not count):

Section 4: Regular Interaction

Please fill out the weekly grid with the types of substantive interaction you plan to use in your course. If your course contains face to face interaction, even if it is designated hybrid/blended, you still must complete the table for the portion of your course that is at a distance. [If your institution/state/region defines “regular” as something other than weekly, modify the table below as appropriate.]

Length of term: _____ weeks	Direct Instruction	Assessment and Feedback	Responding to Questions	Group Discussion	Other Instructional Activities
Week 1					
Week 2					
Week 3					

WORKSHEET INSTRUCTIONS

Sections 3 and 4: "Regular and Substantive"

RSI is not defined in the federal statute but some guidance is given through regulatory rule. In order for your course to meet this standard, thresholds for both "regular" and "substantive" must be met.

Regular

- "(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." (Distance Education and Innovation, 2020, pg. 54809)

Although it may seem counterintuitive, given that answering student questions is one of the 5 types of substantive interaction, "The Department does not consider substantive interactions initiated by students to meet the requirements for regular interaction in the definition of "distance education."" (Distance Education and Innovation, 2020, pg. 54760)

From the 5 determining factors above:

- "The institution has established scheduled and predictable opportunities for substantive interaction between students and instructors and create expectations for instructors to monitor each student's engagement and substantively engage with students on the basis

KEY TAKEAWAYS

- Your institution's best compliance defense is having a process and following it.
- Interactions must be both regular and substantive.
- A well designed and delivered course will meet or exceed compliance.
- Clearer guidance for institutions to follow means clearer standards for enforcement.

LINKS

RESOURCES

- [CF Faculty Worksheet](#)
- [Instructions for CF Faculty Worksheet](#)
- [Federal Register](#)

Feel free to
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Suggested Blog Posts from WCET

- [Interpreting what is Required for “Regular and Substantive Interaction”](#)
- [Negotiated Rulemaking: The Complexity of “Regular and Substantive Interaction”](#)
- [Regular and Substantive Interaction Refresh: Reviewing & Sharing Our Best Interpretation of Current Guidance and Requirements](#)

