Implementing Regular Substantive Interaction

On April 3, 2023, the University of Alaska Fairbanks (UAF) Faculty Senate took a significant step by endorsing a university-wide Regular Substantive Interaction (RSI) policy. This endorsement was a direct response to the US Department of Education's Distance Education and Innovation rule issued on September 2, 2020, which went into effect on July 1, 2021. As part of this endorsement, a dedicated committee was tasked with formulating processes and guidelines to ensure the effective implementation of RSI across the institution, in alignment with the Northwest Commission on Colleges and Universities (NWCCU) accreditation standards. The following document represents the proposed implementation process resulting from the collaborative efforts of this committee.

Definition and Understanding of RSI

Regular and Substantive Interaction (RSI) Policy, as defined by the US Department of Education and incorporated into the NWCCU accreditation standards, mandates that all distance education courses eligible for federal financial aid must incorporate regular and substantive interaction between students and instructors.

Regular interaction within this context refers to engagements that are both scheduled and predictable, establishing a consistent pattern of communication and participation. Substantive interaction, on the other hand, encompasses activities that actively engage students in teaching, learning, and assessment, aligning closely with course content.

Student Surveys

Student surveys will be conducted through a quiz in Canvas with an embedded Airtable form. Accommodations and links will also be provided to faculty teaching distance courses outside of Canvas. Faculty teaching distance courses will be required to include the student survey as part of their syllabus, administering it no later than the end of week 4 of each semester. To encourage student participation, faculty may allocate extra credit or points equivalent to no more than 2% of the total course grade.

The survey will consist of the following yes or no questions, designed to assess the level of regular and substantive interaction between students and instructors:

1. In this course, there has been some form of introduction in which I have received individual feedback from my instructor (e.g., introduction discussion forum, meeting with the instructor, email introduction).
2. In this course, my instructor has posted office hours or set up a means for me to meet with them if I have questions. The information for this is easily accessible.
3. At this point in the course, I have received at least one announcement or post from the instructor about an academic aspect of the class.
4. At this point in the course, I have received personalized comments for at least one assignment or exam.

Faculty Reflection Forms

Faculty teaching distance courses will complete a Faculty Checklist at each semester's end, aiming to assess substantive interactions with students. They'll identify interactions initiated by themselves or teaching assistants, ensuring consistency, frequency, and alignment with course content. To qualify as substantive interactions, these activities must be initiated by the instructor or teaching assistant, be frequent and consistent throughout the semester, and maintain an academic focus aligned with the course content.

To meet the criteria outlined in the policy, faculty should engage in at least two of the following substantive best practices:

1. **Providing Direct Instruction:** Delivering course content through lectures, presentations, or other instructional methods directly to students.
2. **Providing Feedback on Student's Coursework:** Offering constructive feedback on assignments, projects, or assessments to guide students' learning and improvement in a timely fashion.
3. **Providing Course-Related Information or Answering Questions:** Sharing relevant information about the course or addressing students' inquiries to enhance their understanding.
4. **Facilitating Group Discussions about Content or Competencies:** Leading discussions among students to deepen their understanding of course concepts or develop critical thinking skills collaboratively.
5. **Other Instructional Activities:** Engaging in additional academic activities that contribute to students' learning experiences, such as interactive simulations, case studies, or problem-solving exercises

Monitoring and Evaluation

The Accreditation and Assessment office will manage RSI monitoring and evaluation, maintaining an Airtable base and forms for data collection. Reminders will be sent to faculty prior to the beginning of each semester to include student surveys in their courses and syllabi, as well as prompts to complete the Faculty Reflection survey at the semester's end. Additionally, each school/college must develop their own RSI policy aligned with the Faculty Senate-approved RSI policy at UAF, or adopt the UAF-approved policy directly.

Student surveys will include a question about their degree program and the relevance of the course they are taking. This allows us to capture Regular and Substantive Interaction (RSI) data and align it with the relevant degree programs for the program review process, eliminating the need for additional data collection efforts.

While assessment of results is encouraged to be continuous, formal evaluations will occur during mid cycle and full program reviews. This structured approach ensures ongoing compliance with federal regulations and accreditation standards while promoting continuous enhancement of the educational experience for students.

Conclusion

As we seek approval for these procedures from the Faculty Senate, it's crucial to acknowledge the significant progress made since the endorsement of the university-wide Regular Substantive Interaction (RSI) policy. This policy, endorsed last year, reflects our commitment to meeting federal regulations and NWCCU accreditation standards.

The proposed implementation plan outlined in this document, developed through collaborative efforts, ensures that faculty can effectively engage with students while upholding the requirements for regular and substantive interaction. Integration of student surveys with degree program relevance questions streamlines data collection for Program Reviews, enhancing alignment with relevant degree programs.

These streamlined procedures will strengthen the quality of our distance education offerings, benefiting both our students and the broader academic community.

Attachments

- RSI Monitoring Plan
- RSI Checklist
- RSI FAQ
- Faculty Senate Motion 2023-271-3 (UAF Distance Education Policy

RSI Monitoring Plan
Submitted by Teaching and Learning Committee

The Faculty Senate Teaching and Learning Committee, after much review of other university policies, discussion amongst the committee and with our respective colleges and programs have identified the following options for monitoring RSI. The options provide multilevel monitoring and responsibility for meeting RSI in distance education courses.

1. Addition to Syllabus Checklist:

*To be compliant with federal law and **Northwest Commission on Colleges and Universities (NWCCU) accreditation** requirements, UAF faculty must ensure that all courses **where faculty and students are not physically located in the same space** for which students use federal financial aid have regular and substantive interaction (RSI) between students and instructors. Regular refers to interactions that are scheduled and predictable. Substantive refers to engaging students in teaching, learning, and assessment, consistent with course content.*

As your faculty member, I have included the following actions in the course to meet RSI requirements: (select a minimum of two below):

- *Providing direct instruction*
- *Providing feedback on student's coursework*
- *Providing course-related information or answering questions*
- *Facilitating group discussions about content or competencies*
- *Other instructional activities*

*Examples of each type of RSI requirement can be found on the [Regular and Substantive Interaction website through the UAF Center for Teaching and Learning](#).

Reminder E-mail every semester for all current faculty. Submitted to college - have admins check that the syllabi have RSI blurb.

2. Student Evaluation of RSI: Completion of RSI Canvas Commons Survey in Courses

Dear student,

The course you are enrolled in is considered either partially or entirely distance based. As such, UAF requires that courses have regular and substantial interaction (RSI) between students and instructors throughout the course. These interactions can be met in many different ways depending on the structure of the course. In our efforts to ensure this requirement is being met we would like your feedback about your experiences so far this semester. You may be asked to complete this survey more than once if you are taking multiple courses with distance components. Please take a moment to complete the following four question survey.

In this course there has been some sort of introduction in which I have received individual feedback from my instructor (this could be an introduction discussion forum, a meeting with the instructor, an email introduction, etc). Yes NO

In this course my instructor has posted office hours, or set up a means for me to meet with them if I have questions. The information for this is easily accessible. YES NO

At this point in the course I have received at least one announcement or post from the instructor about an academic aspect of the class. YES NO

At this point in the course I have received personalized comments for at least one assignment or an exam. YES NO

Thank you for taking the time to provide feedback about RSI in your courses.

Administered early in the semester (2-4 week, deadline Friday of 4th week), Student completes survey in Canvas, Faculty complete Google/Airtable form with results (lives in Accreditation)

UNIVERSITY OF ALASKA FAIRBANKS

RSI Monitoring Plan   Page 2

UAF is an AA/EO employer and educational institution and prohibits illegal discrimination against any individual: www.alaska.edu/nondiscrimination/.

3. Faculty Reflection of RSI:

- Faculty Checklist to Complete in Airtable completed by Thursday after grades are due, answer for all courses that semester, add conditional button in checklist - did you teach face-to-face or not, send an email out to all faculty, for those individuals not using Canvas, a Google Form will be provided.

4. Program Review (Mid-Cycle & Full)

- Colleges responsible for creating their own RSI policy and monitoring process that is in compliance with the UAF RSI policy.
  - Guidance/Example

    1. Add a question in the action plan - What is your college/school doing to support faculty in providing RSI in distance courses?

    2. Add a question in the assessment plan - Please describe any RSI plans or efforts for the distance courses taught in your school/college based on the Canvas Commons Survey and Faculty Reflection.

RSI Checklist
The Regular and Substantive Interaction (RSI) Policy

To be compliant with federal law and NWCCU requirements, UAF faculty must ensure that all distance education courses for which students use federal financial aid have regular and substantive interaction (RSI) between students and instructors.

Regular refers to interactions that are scheduled and predictable.

Substantive refers to engaging students in teaching, learning, and assessment, consistent with course content and must include two of the following five actions:
1. Providing direct instruction
2. Providing feedback on student's coursework
3. Providing course-related information or answering questions
4. Facilitating group discussions about content or competencies
5. Other instructional activities

To meet the criteria for RSI, these actions must be:
1. Initiated by the instructor
2. Frequent and consistent
3. Academic in nature

For more information:
- UAF Distance Education Policy
- UAF Center for Teaching and Learning information page on RSI
- Graphical explanation of RSI with examples

Types of Interactions	This action is frequent and consistent
Holding online or in-person oce hours (RSI actions 1, 2, & 3)	☐
Publishing regular announcements about course content (RSI action 3)	☐
Providing individual feedback to student work (RSI action 2)	☐
Grading student work and answering emails within an established response time (RSI actions 2 & 3)	☐
Providing mid-semester check-ins for students (RSI actions 1, 2,&3)	☐
Sharing news stories or supplementary resources and relating them back to the course content (RSI action 3)	☐
Responding to discussion board posts with substantive responses (RSI action 4)	☐
Interacting via chat, video, or annotation-based discussion tools (RSI action 4)	☐
Holding study sessions, labs, field trips, or any form of supervision. (RSI action 1)	☐
Other:	☐
Other:	☐

RSI FAQ

Do I need to do all of these things?

No. You must fulfill 2 out of 5 categories to meet the benchmark for RSI. This is to provide flexibility for different course types and instructional strategies.

What is the difference between regular interactions and interactions responsive to student needs?

Regular interactions are the scheduled activities and expectations you set with students regarding your presence in the class at the beginning of the semester. Interactions in response to student needs often occur situationally.

An example would be having set once hours in the syllabus, but also reaching out to individual students and asking them to schedule a time to meet with you when needed. If you do both things throughout the semester, you would check both boxes for "Provide Direct Instruction."

Why don't lecture videos count as direct instruction?

Lecture videos play an important role in online education, but they are static assets in a course that can be reused from semester to semester. Providing individual video feedback, or sharing a video tutorial in response to a current concern in the class would be considered "Providing Feedback on Student Work" and "Providing Course-related Information," respectively.

Do interactions with TAs count as RSI?

Interactions with other members of an instructional team working under the supervision of the instructor of record fulfill the requirements of RSI.

Faculty Senate
Motion 2023-271-3

MOTION:

The UAF Faculty Senate moves to endorse the UAF Distance Education Policy. The Faculty Senate and UAF administration will work together during AY24 to create processes and guidelines to implement the policy consistent with the US Education Department and NWCCU requirements.

EFFECTIVE: Immediately

RATIONALE: On September 2, 2020 the US Education Department developed a rule on Distance Education and Innovation. UAF's accrediting body, the Northwest Commission on Colleges and Universities (NWCCU) adopted a Distance Education Policy in April 2021 to guide their review of colleges' and universities' distance education offerings and verify that policies are in place. The policy below creates a framework for UAF administration and the Faculty Senate to create processes and guidelines to implement the policy consistent with the US Education Department and NWCCU requirements. The UAF Faculty Senate is committed to quality education and student engagement across all modalities.

After discussion between the UAF Faculty Senate and Administrative Committee, the policy was approved on March 29, 2023 to go on the Faculty Senate agenda for endorsement.

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This action was passed by the Faculty Senate on April 3, 2023.

Ataur Chowdhury
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Ataur Chowdhury, UAF Faculty Senate President

The Chancellor: _____ Approves _____ Vetoes _____ Acknowledges

Daniel M. White
AE6BD6A19CA648C...   Date: April 26, 2023

Daniel M. White, UAF Chancellor

Motion 2023-271-3

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Distance Education Policy

Regular and Substantive Interaction

At the University of Alaska Fairbanks, "regular and substantive interaction" with the instructor is essential to differentiate between self-paced (correspondence) courses and interactive (distance education) courses. This is necessary to comply with federal regulations for financial aid and NWCCU accreditation policies.

Regular and substantive interaction between instructor(s) and students requires:

1. *The institution's online instruction is delivered through appropriate media.*
2. *The instructors 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 created expectations for instructors to monitor each student's engagement and substantively engage with students on the basis of that monitoring.*
5. *Instructors are responsive to students' requests for instructional support.*

The University of Alaska Fairbanks Faculty Senate has defined "regular and substantive interaction" as faculty-initiated, meaningful, and beneficial interaction between the instructor and the students. Information about the instructor's communication plan, to include how students can expect interaction from the instructor, when to expect feedback from assignments, and response times to student-initiated outreach must be on the syllabus.

The technologies that may be used to offer **"distance education"** include:
- The Internet;
- One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- Audio conference; or
- Other media used in a course in conjunction with any of the technologies listed above.

"Regular" refers to:
- Interaction between a student and an instructor(s) prior to the student's completion of a course or competency that is scheduled and predictable
- Monitoring the student's academic engagement and success
- Monitoring the need for and proactively engaging in substantive interaction with the student
- Responding to student requests for assistance or questions in a timely manner

"Substantive" refers to the quality of teacher interaction that results in improved learning experiences and is defined by the U.S. Department of Education as "engaging students in teaching, learning, and assessment, consistent with the content under discussion:"

All UAF distance courses must **include at least two of the following:**
- Direct instruction - lectures, demonstrations, establishing learning objectives, modeling a process or activity
- Meaningful, beneficial and timely feedback – prompt assessment of student performance and detailed explanations that help students understand where and how to improve future work
- Providing additional information related to course content to students
- Responding to course content and assignment-related questions
- Facilitating group discussion on course content or assignments