

UNIVERSITY OF **INDIANAPOLIS**

Federal Compliance in Distance Education Courses

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Workshop Objectives

- **Explain** the **importance of regular and substantive interaction (RSI)** in institutional accreditation
- **Define RSI** in distance education courses
- **Describe** at least **one example of sufficient RSI** in a distance education course
- **Describe** at least **one example of insufficient RSI** in a distance education course
- **Identify** at least one way in which your unit could **improve upon RSI** in your distance education courses

What is RSI (in brief)?

- Regular = consistent
- Substantive = meaningful
- Interaction = engagement between the instructor and the learners

What is Distance Education?

- “Education that uses **one or more of the technologies** listed (on next slide) to deliver instruction to **students who are separated from the instructor(s)** and to **support regular and substantive interaction** between the students and the instructor or instructors, **either synchronously or asynchronously**” (HLC, n.d.).

Distance Education Technologies

- “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 in items 1–3 above” (HLC, n.d.).

Distance Education Course

- “A course in which at least **75% of the instruction and interaction occurs using one or more of the technologies** listed in the definition of distance education, with the faculty and students physically separated from each other” (HLC, n.d.).
- At UIndy, this applies to courses with the following codes: Online Asynchronous (OA), Online Synchronous (OS), and Hybrid with 75-99% of the course online (H7599).

Distance Education Program

- “An **academic program offered in whole or in part through distance education**, regardless of whether a face-to-face, on-ground, or residential option is also available” (HLC, n.d.).

What is Correspondence Education?

- “Interaction between instructors and students in a correspondence course is limited, not regular and substantive, and is primarily initiated by the students.” (HLC, n.d.).

Explain the importance of regular and substantive interaction (RSI) in institutional accreditation

HLC Reviews Federal Compliance

- Every institution must publish its credit hour policy by which it fulfills the federal expectation for meeting a credit hour.
- There are two ways to meet the credit hour expectations: seat time (35 hours per one credit hour) or assessment (through student outcomes)
 - Only use the assessment method which means that the same learning outcomes are met through whatever modality a course is offered. We vary length of term, modality, and instructors, but we state that the student outcomes are the same and are met in each of the same course offerings.
- PSI is counted in meeting the credit hours assigned to an offering.

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Institutional Accreditation

- Higher Learning Commission (HLC) provides Reaffirmation of Accreditation for UIndy
- The review requires that we meet the Criteria for Accreditation and Core Components assuring quality.
- We must demonstrate Federal Compliance in a separate but related review to meet Department of Education's Credit Hour requirements.
- The status affiliation for UIndy states approval for Distance Education and not Correspondence Education.
- We must demonstrate that we follow all HLC Assumed Practices for institutions of higher education.

HLC Reviews Federal Compliance

- Every institution must publish its credit hour policy by which it fulfills the federal expectation for meeting a credit hour.
- There are two ways to meet the credit hour expectations: seat time (15 hours per one credit hour) or assessment (through student outcomes).
 - UIndy use the assessment method which means that the same learning outcomes are met through whatever modality a course is offered. We vary length of term, modality, and instructors, but we state that the student outcomes are the same and are met in each of the same course offerings.
- RSI is counted in meeting the credit hours assigned to an offering.

HLC Approval for Only Distance Education

- HLC distinguishes between Distance Education and Correspondence Education through, in large part, RSI.
- Distance Education requires regular and instructional interactions with students unlike Correspondence Education that allows independent learner development apart from the instructor.
- UIndy is not accredited for Correspondence Education. When RSI is not present in a course, then it appears similar to a correspondence course presenting a situation in which the institution is outside allowed permissions.

HLC Reviews Distance Education

- Core Component 3.A.3 states that the quality and learning goals of academic offerings are consistent across modalities including in-person, hybrid and online instruction.
- Regular Substantive Interaction (RSI) demonstrates that interaction is occurring with students across all modalities in ways that are appropriate to each. Similar instructional commitment is expected.
- It is expected that institutions will follow best practices in Distance Education. See C-RAC and Proposed 21st Century Guidelines for Distance Education

State Authorization: NC-SARA

- UIndy is a member and approved to offer distance education courses and experiences to students in other states through NC-SARA (North Central-State Authorization and Reciprocity Agreement).
- As such, UIndy must affirm that it follows best practices in Distance Education including following C-RAC, now updated as 21st Century Distance Education Guidelines. <https://www.c-rac.org/post/c-rac-statement-on-distance-education-guidelines>
- Also see the wcet.wiche.edu advisory on RSI

4.19 Faculty Expectations for Teaching Distance Education (“On-line”) Courses [Updates to this section were approved by the Faculty Senate on 10-26-2021.]

All distance education coursework, as defined by the Higher Learning Commission (HLC), (<https://www.hlcommission.org/>) should meet UIndy’s standard of quality and excellence. Faculty teaching distance education courses must:

- (A) demonstrate competence, as defined by the Faculty member’s primary unit, in the use of the learning management system either through prior experience or completion of tutorials and/or reviewing of training materials (consistent with HLC Policy CRRT.B.10.010, 3C);
- (B) ensure 40-50 hours of student work per credit hour, including any synchronous and asynchronous on-line or off-line course activities, to be consistent with the Carnegie Unit system (consistent with HLC Policy FDCR.A.10.020);
- (C) engage in regular and substantive interaction with each student, as defined by current U.S. Department of Education standards, such that students can apply feedback received to increase their knowledge and/or improve their performance throughout the course (consistent with the HLC definition of distance education);
- (D) enforce current University, department, and/or program policies and comply with administrative procedures for grades and attendance documentation; and
- (E) follow the current standards for distance education courses as articulated by the HLC.

Define RSI in distance education courses

What is RSI?

- “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:
 - 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
 - **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” (HLC, n.d.).

Substantive Interaction

- Interactions that “engage students in meaningful **‘teaching, learning, and assessment activities,** consistent with the content under discussion,’ and also **includes at least two of the following activities:**
 - Providing direct instruction;
 - Assessing or providing feedback on a student's coursework;
 - Providing information or responding to questions about the content of a course or competency;
 - Facilitating a group discussion regarding the content of a course or competency; or
 - Other instructional activities approved by HLC or the program's accrediting agency” (Harmonize, 2022).

Regular Interaction

- “Interactions should be **scheduled, predictable**, and **initiated by the instructor**.
- Interactions with students should be **frequently and consistently repeated** throughout the semester.
- It is not strictly required that interactions take place on a weekly basis, but once a course begins, **long intervals of time should not pass** between the initial instructor interaction with students” (Harmonize, 2022).

To Be Scheduled and Predictable...

- “Course materials should describe the expected **frequency of interaction** with the instructor, including times and dates of virtual office hours if applicable, grading feedback, announcements, and potential email communications.
- An example of scheduled and predictable would be to say that a **new lesson is released every {insert day of the week}** and **feedback will be provided to students one week later**, or some equally predictable timeframe” (Harmonize, 2022).

Five Key Questions

- “Is an **appropriate form of media** used?”
- Do the course **instructors meet** your **accrediting agency’s faculty requirements?**
- Does the instructor **schedule opportunities to interact in a predictable cadence?**
- Are at least **two of five substantive activities** used?
- Are instructors **responsive to students?**”
(Harmonize, 2022).

RSI and Alignment

- Integration of RSI supports alignment with Universal Design for Learning (UDL) and inclusive teaching practices
- **All learners are unique**
- UDL promotes **improving and optimizing learning** for all learners
- Frequent and formative feedback **create and strengthen the connections** in our brains
- Every **lesson, assignment, and interaction** shapes your students' brains

It's Easier Than You Think

- RSI aligns with many of the best practices for teaching and learning
- Assignments and learning activities within an online or hybrid course should **create opportunities for the instructor to assess learning using substantive or meaningful feedback.**
- Feedback should be meaningful, both in areas **where a student is doing well** and **where they could improve** — both forms helping students stay engaged and motivated to continuously improve.

How Does This Take Place?

- Synchronous instruction where both the instructor and student are present at the same time but also asynchronous activities, such as **participating in discussions**, **providing feedback**, and **office-hour interactions** in which the **instructor talks to the student about coursework**.

Why RSI Matters

- We risk **losing funding and could face fines** if non-compliant.
- “Regular and substantive interaction is more than just another federal requirement; **it is the foundation of effective online teaching and learning**” (Harmonize, 2022).
- Studies show that engagement **remains a leading indicator for student success** when it comes to retention and advancement.

Why RSI Matters

- “Regular (frequent, consistent) and substantive (meaningful) interaction in the form of **discussion, collaboration, feedback**, and **other learning activities impact a student’s engagement** in the course.
- Studies show that **engagement remains a leading indicator for student success** when it comes to retention and advancement” (Harmonize, 2022).

Why RSI Matters

- “Students who are highly engaged are **1.5 times more likely to complete a degree**” (Svanum & Bigatti, 2009, as cited in Harmonize, 2022).
- “Engaged students, on average, **require one fewer semester to complete their degree**” (Svanum & Bigatti, 2009, as cited in Harmonize, 2022).
- “Students who actively participate **are more motivated**” (Frisby & Myers, 2008; Junn, 1994, as cited in Harmonize 2022), “**engage in more critical thinking**” (Garside, 1996, as cited in Harmonize, 2022), “and **show improvement in communication skills**” (Dancer & Kamvounias, 2005, as cited in Harmonize, 2022).

Barriers to Engagement

- “The often **transactional delivery of material**
- A **lack of built-in connection** and communication with others
- **Less opportunity to build classroom community**” (Harmonize, 2022).

Strategies for Including RSI in Online Course Design and Delivery

- **“Regulations don’t dictate what activities to use and how often to include them** to be considered regular and substantive interaction.” (Harmonize, 2022)
- “Rather than overly prescriptive, the **regulations can be viewed in terms of a scale, allowing flexibility and creativity** when designing online courses.” (Harmonize, 2022)

Describe at least one example of sufficient RSI in a distance education course

Describe at least one example of insufficient RSI in a distance education course

Small Group Activity

- Use the link in the chat to access RSI scenarios.
- Work in small groups (breakout rooms) to discuss the scenarios.
- Please choose someone to download the document, take notes, and report to the large group during our debrief.
 - Please also make note of any questions that you have.

Scenario #1

- Professor A maintains that RSI is occurring in the online classroom for the following reasons:
 - An introductory video to the course instructor is posted before the course begins.
 - Each week, the instructor posts an announcement with reminders about assignment deadlines.

Does this meet compliance for RSI? Why or why not?

Scenario #2

- In Professor B's class, students participate in online discussion on a weekly basis. Grades are calculated by whether or not the student has posted the number of times given in the discussion board requirements.

Does this meet compliance for RSI? Why or why not?

Scenario #3

- Professor C posts a weekly announcement, where they review the upcoming lesson content, on the start date of each lesson. The instructor also records all the lectures for an online course and posts them weekly along with the material for the week. Students use those recorded lectures to engage in discussion forums and complete assignments.

Does this meet compliance for RSI? Why or why not?

Identify at least one way in which your unit could **improve upon RSI** in your distance education courses

Reflection

- How do you feel like you and your unit are doing in addressing RSI in distance education courses?
- How can the Faculty Academy help you and your faculty to ensure RSI is incorporated into your unit's distance education courses?
- What questions do you have?

References

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Evaluation

- Please take a moment to complete the evaluation
 - <https://tinyurl.com/UIndyFedComp>