

College of San Mateo Policy on Regular and Substantive Interaction¹

As changes are needed to this document, the Academic Senate or the Academic Senate subcommittees will update the policy.

Guiding Principle

Instructor-initiated regular effective contact requires early, continuing, and consistent communication from the instructor of record to the class as a whole and to individual students.

Paramount to the development and actualization of Online/Hybrid courses is the responsibility of the instructor to ensure regular and substantive contact with students. This challenge is often equated as parity with face-to-face (F2F) courses. This means that interaction and content delivery must parallel a F2F class. The guidelines here are representative of a typical three-unit course.

The District approved learning management system (LMS) (currently that system is Canvas) course “shell” must be developed to be more than a “container for lectures” and multiple-choice tests. An Online/Hybrid instructor must create active interactions between instructor and student and between student and student.

This is different from a correspondence course in that a correspondence course is typically self-paced; provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor; interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student (34 C.F.R. §600.2).

Application

Any portion of a course conducted through distance education includes regular effective interaction between instructor and students (Title 5 Regulation Section 55204). Regular and effective interaction may be accomplished in a variety of ways and is subject to local definition, however, it must be able to be verified by the college through transparent practices to comply with federal regulations. All modes of instruction, Fully Online (FO), Partially Online (PO) and Online with Flexible In-person component (OFI) are subject to this policy for Regular and Substantive Interaction.

Regular Interaction - Definition

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

¹ The title of the policy is changed from CSM Policy on Regular and Substantive Contact (May 2020) to CSM Policy on Regular and Substantive Interaction to more closely align the intent and purpose of Federal Guidance as communicated in the April 2020 Proposed Rulemaking documentation and the language in the local course design rubrics that are in use at CSM (i.e., OEI rubric and Peralta Online Equity rubric or current approved best practices).

substantive interactions with the student on a predictable and regular 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.

Substantive Interaction - Definition

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.

Requirements to Satisfy Regular and Substantive Interaction

All courses designated as Partially Online (PO), Online with Flexible In-person component (OFI), or Fully Online (FO) at College of San Mateo will include:

- Regular instructor-initiated interaction for the portion of the class that is not delivered online (PO and OFI) or for a duration equivalent to onsite classes (FO). The interactions should be on a predictable and regular basis and built into the course design.
- Regular instructor-initiated substantive interaction with students through some of the activities described in the Appendices.
- Support of student-to-student structured and unstructured interaction opportunities that are predictable and built into the course design.
- Faculty using any third-party or publisher tools are responsible for ensuring that all student grades and instructor feedback are synced with and archived in the District-approved LMS and that no student grades and/or personally identifiable information is stored in third-party systems. Faculty using third-party or publisher tools must provide documentation, evidence and access (peer review evaluators and accreditation reviewers) to these tools that demonstrate compliance with the CSM policy for regular and substantive interaction.
- All student grades and feedback are synced with the District-approved LMS gradebook and are archived in the District-approved LMS.

Terminology

- **Instructor Presence.** Instructors need to create a sense of “presence” for which students are aware and with whom interaction is available.
- **Office Hours.** Regular office hours should be listed through published office hours and availability for answering questions and giving feedback that includes both synchronous

and asynchronous modes. Instructors should clearly indicate when they will be available to students, and when they will not be available (i.e., weekends, vacations, holidays, if appropriate). In fully online courses, best practice is to provide links to the Office Hours and/or scheduler in the course shell.

- **Feedback.** SMCCCD best practice guidelines suggest instructors should respond to student inquiries within two business days. A portion of feedback on course assignments that is provided in a course must be substantive, i.e., of an academic nature, whereby the interaction furthers learning or assesses learning, rather than being organizational or procedural communications and within a timeframe that is specified in the course syllabus. Providing a score or grade is not considered substantive.
- **Gradebook.** Instructors must use the LMS gradebook to record grades in order to ensure that students have access to updated grades, to ensure that grading continuity can take place in the event of an emergency or extenuating circumstances.
- **Instructor-Initiated Interaction.** Instructors will regularly initiate substantive interaction with students on a group or one-to-one basis. The instructor will monitor the student's academic engagement and success, and promptly and proactively engage in substantive interaction on the basis of such monitoring, or upon request by the student.
- **Student-Initiated Interaction.** Faculty will encourage ongoing structured and unstructured student to student interaction. Examples include implementing communication means for varied types of interaction in the course design, monitoring assignments and projects that promote collaboration among students, posing questions in the discussion boards that encourage critical thinking skills and promote interaction, assigning group projects, and monitoring student engagement to ensure that students participate with depth. Collaborative tools within the LMS are often one of the best ways to achieve student to student interaction, in addition to discussions.
- **Third-Party Integrations.** Best practice for the application of FERPA guidelines requires single sign-on and that assignments and grades are only kept with the District LMS. Use of publishers' materials compromises student's private data if faculty send the student out of the LMS or directly to a publisher's site. The LMS enables LTI integration of publisher content with a single sign on. This integration allows faculty to keep all student data within the LMS on the District Servers and therefore not violate FERPA.
- **FERPA.** Is the acronym for The Family Educational Rights and Privacy Act of 1974. It provides guidelines for access to and release of student educational records. FERPA applies to the District because the colleges receive federal funds. Education Records may be in any form and include written documents, computer media, video or audiotape, photographs, and electronic files. Examples include demographic information, class schedules, enrollment records, class lists, grades, graded assignments, Social Security Numbers, and ID Numbers. Best practice for the application of FERPA guidelines requires single sign-on, and that assignments and grades are only kept within the District required LMS. Use of publisher's materials compromises student's private data if faculty send the student from the LMS to publisher's sites. The LMS enables LTI integration of publisher content with a single sign on. This integration allows faculty to keep all student data within the course shell on District Servers and therefore not violate FERPA.

- **Fully Online (FO):** Instruction involving regular and effective online interaction that takes place synchronously or asynchronously and is supported by online materials and activities delivered through the District LMS, and through the use of other required materials. All approved instructional contact hours are delivered through these online interactions. Fully online classes do not require in-person assessments or activities. If synchronous online activities are required, the schedule of classes indicates dates and times. (2019DEETACdraft).
- **Partially Online (PO): (also known as “hybrid”)** Instruction involving regular and effective online interaction for any portion of the approved contact hours that takes place synchronously or asynchronously and is supported by materials and activities delivered in person and online through the District LMS, and through the use of other required materials. Any portion of a class that is delivered online must follow a separate approval process. The approved online portion must meet the regular and effective contact regulation. The schedule of classes indicates dates, times and locations of the required in-person components.
- **Online with Flexible In-person component (OFI):** Instruction involving regular and effective online interaction that takes place synchronously or asynchronously and is supported by online materials and activities delivered through the District LMS, and through the use of other required materials. Approved instructional contact hours are delivered through online interactions, supplemented by required in-person assessments or activities that are available at approved locations during a specified range of time. The schedule of classes indicates dates, range of times and locations of all required in-person components.
- **Operational information:** reminders of due dates, college-wide announcements, calendar changes, posting of grades, posting new content (without academic discussion of the content).

Relevant Title V References

- 55200 Definition and Application
- 55204 Instructor Contact
- 55206 Separate Course Approval
- 55208 (b) Faculty Selection and Workload
- DE Guidelines supporting 55208 - Professional Development
- 2019DEETAC-draft
- Federal Register Vol 85, No. 64 (April 2, 2020)

Appendices

Appendix A: Instructor-Initiated Interaction

These interactions are initiated by the Instructor. Consult the list for the kinds of interactions considered to be regular, substantive or combined (regular and substantive). A course design must include at minimum two of the enumerated types of interaction below on a regular and predictable basis; the additional interaction types should also be included in a course design should they best suit the needs of the students. Suggestions in the regular and substantive columns are suggestions and not meant to be prescriptions or to represent the options available in their totality.

Type of Interaction	Regular	Substantive
1. Direct Instruction		• Synchronous lectures with student participation • Demonstrations • Labs • Simulations • Modeling of a process or learning activity • Recorded (asynchronous) demonstrations or lectures that are available in the LMS
2. Assessing or Providing Feedback on Student Coursework	• Personal communication to individual students, subset of students (but not all students enrolled in the course) • Expectation that student inquiries are answered in two business days	• Use of Assignment Comments to document student supports and guidance related to content • Use of LMS gradebook to record and communicate student grades.
3. Providing information or responding to questions about the content of a course or competency	• Operational Announcements made in the LMS	• Q& A Discussion Board that the instructor monitors and responds to about the content of a course or competency • Announcements made in the LMS that reflect on trends in collective student assessments or performance • Announcements made in the LMS that provide guidance about

		student interaction with the content of a course or competency
4. Facilitating a group discussion regarding the content of a course or competency	• Respond within a threaded discussion or group discussion • Academic response, not operational • Can be to individual students or to groups of students • Regular participation by instructor in discussion activities with students: for ex, provide a summary, to correct errors of fact, to keep the discussion on topic, to add expertise to the content of the discussion • Opportunities for questions and answers in chat room	• Threaded discussion or group discussion concerning content of the course • Participation in open-ended discussion board that concerns content of the class • Instructor participation in discussion activities with students: for ex, provide a summary, to correct errors of fact, to keep the discussion on topic, to add expertise to the content of the discussion
Announcements	• Academic or operational announcements (Ex: Check-in video) • Addresses trends or patterns in recent exams or other formative assessments	• Academic (not operational) announcements • Grading comments/Assignment feedback that are relevant for the whole class • Announcements that have threaded discussion opportunities
Assignments	• Instructor participation in online group collaboration projects	• Instructor facilitation of in online group collaboration projects • Instructor provides formative and summative assignment comments to support students in their learning progress.
Office Hours	• Virtual office hours that address specific student academic concerns or needs	• Content-focused office hours

Other	• Gradebook Comments • Review sessions that address specific student academic concerns or needs • Opportunities for questions and answers in chat room	• Gradebook comments that go beyond “great job,” or simple compliments. • Includes a personal address(e.g., “Hello, Teresa..”) • Timely feedback within a timeframe that is specified in the syllabus must be substantive and provide the student an opportunity to reuse the feedback and apply/transfer to other skills, concepts, attitudes, or knowledge. • Evaluation of student work will be transparent and evaluation methods are clear to students. It is strongly suggested to use LMS Rubrics. • Provides specific information to help student(s) improve or enhance their work • Review sessions that address specific student academic concerns or needs • Face-to-face formal, not required meetings (ex. Field trips, speakers, concerts, observatories, etc)
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Appendix B: Student Initiated Interaction

These interactions are initiated by the Student. Consult the list for the kinds of interactions considered to be regular, substantive or combined (regular and substantive). A course design must include at minimum two of the enumerated types of interaction below on a regular and predictable basis; the additional interaction types items should also be reflected in the course design should they best suit the needs of the students. Suggestions in the regular and substantive column are suggestions and not meant to be prescriptions or to represent the options available in their totality.

Type of Interaction	Regular	Substantive
1. Direct Instruction		• Synchronous lectures with student participation • Asynchronous lectures with threaded discussion • Guest speakers invited to share expertise with students
2. Unstructured Interaction	• Students encouraged to interact with one another about topics of their choice that may have peripheral relation to the course topic.	• Students encouraged to interact with each other and the world-at large about topics related to the content. • Chat is enabled and periodically monitored by instructor as a space for students to communicate • Student groups are used to facilitate unstructured interaction.
3. Personal Communication	• Personal communication initiated by individual students to instructor to check in • Anonymous surveys in the LMS	• Personal communication initiated by student to instructor that is not operational

Discussions	• Respond to instructor within a threaded discussion or group discussion • Academic response, not operational • Can be to individual students or to groups of students • Opportunities for questions and answers in chat room • Participation in open-ended threaded discussion opportunities	• Participation in threaded discussion content-focused opportunities
Assignments		• Student-initiated feedback or reflection on an assignment • Instructors assign students to peer review groups to evaluate and give feedback, observations, and suggestions on peers' assignments or projects.
Small Group Collaborations & Group Projects		• Instructors create opportunities for small groups and allow students to work collaboratively. • Instructors provide expectations or a rubric outlining participants' contributions to a group. • Instructor regularly monitors the groups and provides feedback.
Student-to-Student Q & A		• Instructors provide a peer-discussion forum, cyber lounge/cafe, or threaded discussion that is not graded. In these forums, students can share their learning, such as concepts they learned well and concepts that they find difficult to understand. Instructor assigns student moderators

		and/or monitors the forum regularly.
Other	• Review sessions that address specific student academic concerns or needs • Opportunities for questions and answers in chat room	• Gradebook comments that engage students in providing a response • Review sessions that address specific student academic concerns or needs • Face-to-face formal, not required meetings (ex. Field trips, speakers, concerts, observatories, etc)