| UNIVERSITY OF NEBRASKA AT OMAHA

Regular and Substantive Interaction (RSI) in Distance Education Courses

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Scope

This policy affects all University of Nebraska at Omaha (UNO) academic units and instructors developing, offering, and engaging in delivery of distance education programs, courses, and activities for academic credit, including courses and sections labeled Online, Hybrid, Remote, or other comparable designations.

Policy Statement

In 2020, the federal government clarified expectations requiring all distance education programs to assure "regular and substantive interaction between students and faculty." The University of Nebraska at Omaha is committed to complying with all requirements regarding the operation of distance education within US states and territories. The criteria developed by the federal government to communicate its expectations regarding *regular and substantive interaction* (RSI) are below, respectively, followed by an explanation of UNO's strategy for meeting those expectations.

Institutions must ensure *Regular Interaction* between a student and an instructor or instructors by:
- providing the opportunity for substantive interaction 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 substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.

At UNO, interactions with students should be instructor-initiated and occur at reasonably frequent and consistent intervals throughout the term. The types of interaction may vary based on the overall nature of the course and the course objectives and student needs at a given time in the term, but a regular cadence of interactions should remain as consistent as possible. In a standard semester-length course, the instructor should *monitor* course activities at least twice a week and *interact* with students individually or as a group at least once a week, or the equivalency in a non-standard length course. Monitoring the course involves checking student correspondence and activity, including in the learning management system (LMS), to assure that students are consistently engaged and positioned to succeed in the course. Interacting with students includes responding to student inquiries, giving feedback on student assessments, and/or participating in student discussions. In general, providing timely feedback on coursework and grades is a best practice, and holding weekly office hours is a requirement for all courses at UNO, including those offered online.

Substantive Interaction is assured by engaging students in teaching, learning, and assessment consistent with the content under discussion, and includes *at least two of the following*:

- Providing direct instruction (*applicable only to synchronous delivery*)
- 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
- Other instructional activities approved by the institutional accrediting body or by the program's program accrediting body (*requires special permission*)

At UNO, a variety of strategies developed by instructors or recommended in the UNO RSI Faculty Resource Guide may be used to meet two or more of the substantive interaction criteria above. The specific strategies chosen in each course may depend in part on factors such as modality, academic discipline, course level, learning objectives, class size, etc. Fully asynchronous online courses must meet at least two criteria that *do not* include "providing direct instruction." Instructors are encouraged to meet as many of the above RSI criteria as possible in each course, and faculty are urged to share successful RSI strategies at the unit, college, and institutional level.

Reason for Policy

Institutions of higher education in the United States are required to comply with federal and recognized accreditor definitions and expectations related to regular and substantive interaction between students and faculty to assure institutional eligibility for participation in the Federal Financial Aid Program. This policy supports both quality instruction and assures compliance with UNO's accreditor, the Higher Learning Commission (HLC), and the US Department of Education (ED).

Procedures

The procedures associated with this policy include the responsibilities assigned to instructors and academic colleges and units, as well as the institutional processes for assuring RSI compliance. At each of these levels, the Digital Learning team at UNO is responsible for creating and maintaining informational resources and training on regular and substantive interaction, including an RSI Faculty Resource Guide that includes recommendations and checklists for achieving RSI compliance. Support services offered through Digital Learning are designed to create highly engaging, highly connected online and hybrid courses that meet all RSI requirements.

Instructors teaching distance courses are responsible for assuring that their courses are designed to facilitate RSI between instructors and students and that RSI is occurring in their courses. Each academic college or unit is responsible for ensuring that instructors who teach distance education courses in their programs comply with this policy and its associated regulations. Assurance of regular and substantive interaction may be prompted and achieved in several ways.
- For *instructors*:
  - The completion of Digital Learning's Foundations of Teaching Online course is strongly recommended for all instructors offering distance courses.
  - Instructors may complete one or more Humanizing Online courses, an entire series that is centered around RSI in distance courses. Periodic Digital Learning workshops also support RSI compliance.
  - Instructors of any distance course may independently request a Course Design Review from the Digital Learning team, which uses a course design rubric based on nationally recognized instrumentation that facilitates the design and delivery of distance courses and ensures compliance with RSI requirements.
  - Instructors developing a course for online delivery can participate in Digital Learning's Online Course Development Grants, which includes instructional design support and the use of the course design rubric.
- Individual *academic colleges or units* may create their own processes for assuring RSI compliance, but some suggestions include:
  - Deans, chairs, or directors may require that faculty teaching online courses complete and submit an RSI checklist or otherwise assure that RSI requirements are being met in online and hybrid courses. Supplementary teaching evaluation tools such as F-IMPACT may be useful evidence for demonstrating RSI.
  - Deans, chairs, or directors may recommend that individual instructors request a Course Design Review from the Digital Learning team.
  - Programs adding online modality can participate in Digital Learning's Online Program Development Grants, which provide training in the fundamentals of online teaching, course development funds, and course design reviews.
  - "Legacy" online programs – programs that were approved for Online Delivery prior to the availability of Online Program Development Grants – may participate in Digital Learning's Program Tune-Up Grants,

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which provide RSI checks, course development support, and course design reviews for courses and faculty that have not recently or have never participated in the Instructional Design process.
- At the *institutional* level:

Online and hybrid courses may be randomly assigned an RSI review through an annual sampling process conducted jointly by Academic Affairs and ILCI. The standards contained in the RSI Faculty Resource Guide will be used to assess RSI compliance and, when necessary, to recommend steps to achieve compliance. Direct support from Digital Learning to meet RSI compliance will be offered to instructors and programs as needed.

Definitions

Definitions of *regular* and *substantive* interaction have been incorporated within the policy statement. Additional related and descriptive information is found within this section.

Academic Engagement requires active participation by a student in an instructional activity related to the student's course of study as defined by the institution consistent with any requirements imposed by its state approval or accrediting agency. Academic engagement can include such activities as attending a class where the students and instructor can interact, turning in an academic assignment or taking a test, participating in an interactive computer-assisted instruction, participating in an institutional-directed group activity or online discussion, or interacting with the instructor regarding academic matters.

Competency-Based Education (CBE) refers to courses included within the UNO CBE Pilot Program, or those courses offered going forward if/when UNO receives full authorization for CBE from the federal government and HLC. Faculty-student interaction in CBE courses will be governed by a separate policy.

Correspondence Education is defined as a course provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructors. Correspondence Education is not the same as Distance Education. *UNO is not currently authorized to deliver via Correspondence Education*.

Distance Education, as defined by the federal government, is: "education that uses one or more of the technologies that follow to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously. The technologies that may be used to offer distance education include: 1) the internet; 2) one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite or wireless communications devices; 3) audio conference; or 4) other media used in a course in conjunction with any of the technologies listed in items 1–3." *A distance course is one in which 75% or more of the course is delivered by distance education with faculty and students physically separated within a specified academic term.*

Faculty or Instructor is the individual responsible for delivering course content and who meets the qualifications for instruction as established by UNO's policy on faculty credentials.

Week of Instructional Time is any week in which:
- At least one day of regularly scheduled instruction or examinations occurs, or, after the last scheduled day of classes for a term or payment period, at least one day of study for final examinations occurs; or
- In a program offered using asynchronous coursework through distance education or correspondence courses, the institution makes available the instructional materials, other resources, and instructor support necessary for academic engagement and completion of course objectives; and in a program using asynchronous coursework through distance education, the institution expects enrolled students to perform educational activities demonstrating academic engagement during the week.

Additional Contacts

Subject	Contact	Phone	Email
Interpretation and application of policy	Academic Affairs	402.554.2262	academic.affairs@unomaha.edu
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History

This is a new draft policy. Incorporation of "regular and substantive interaction between students and faculty" has always been an HLC Assumed Practice. The policy is being articulated at this time for several reasons, including the more recent expansion of asynchronous delivery of instruction in response to the pandemic and a heightened focus by the federal government on this element of instruction.

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