DRAFT 3: Policy on Regular and Substantive Contact

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 equalitable a F2F class.

The District approved learning management system (LMS) 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. Statement about not a correspondence course

Application

Any portion of a course conducted through distance education includes regular effective contact between instructor and students (Title 5 Regulation Section 55204). Instructor contact 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 Contact.

Requirements to satisfy Regular and Substantive Contact
- All fully online courses at College of San Mateo will include:
  - Minimum of **twice** a week of regular contact with each of your students is required
  - Minimum of **once** a week of substantive contact with each of your students is required
- All courses designated as Partially Online (PO) and Online with Flexible In-person component (OFI) at at College of San Mateo will include:
  - Minimum of once a week regular contact for the portion of the class that is not delivered online.
  - Minimum of **once** a week of substantive contact with each student is required

- Student-to-student contact is required weekly. Minimum of 3 planned activities during the semester. See Appendix B
- Faculty teaching online courses must use the District Required Learning Management System (LMS) (currently that system is Canvas) and its native tools as their primary course management system to ensure that evidence of regular and substantive contact with students is documentable. Faculty using any third-party or publisher tools are responsible for providing documentation, evidence and access (peer review evaluators and accreditation reviewers) to these tools that demonstrate compliance with the CSM policy for regular and substantive contact.
- Faculty must indicate at least one method of contact whereby a student inquiry is answered within 24 to 48 hours in their syllabus at minimum.
- The expectation is that all regular communication with students should take place in the LMS (for ex. Canvas Conversations tool) in order to ensure transparency and to document regular and substantive interaction

Regular Contact

- Instructors commit to interacting weekly with online students for a duration equivalent to onsite classes. The interactions should be **predictable** and built into the course design. Every week, instructors interact substantively and personally with online students through some of the activities described in the Appendices. Instructors send class-wide announcements, emails, or messages weekly at a minimum.

Substantive Contact

- Interaction between faculty and students should use multiple channels, besides just messaging through the District required LMS (currently that system is Canvas). Discussions, and regular announcements, are an added but minimal way to connect with students. Interaction must be substantive, i.e., of an academic nature, whereby the interaction furthers learning or assesses learning, rather than being organizational or procedural communications. Best practices are that faculty should use a variety of communication tools available in Canvas in their classes. These tools include both real time modes, such as Chat and Conferences and asynchronous tools such as Conversations, which is the email/inbox app in Canvas.

- Content considered substantive contact must be subject specific and academic in nature.

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 contact 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).

- **Feedback.** Timely feedback that replicates the contact of F2F courses, with communication between faculty and students occurring no less frequently than in a comparable F2F course. SMCCCD best practice guidelines suggest instructors should answer student questions as soon as possible within 24 to 48 hours.

  Feedback must be substantive, i.e., of an academic nature, whereby the interaction furthers learning or assesses learning, rather than being organizational or procedural communications. Proving a score or grade is not considered substantive.

- **Gradebook.** Instructors should be using the Canvas gradebook to record grades in order to ensure that students have access to updated grades at any given time, to ensure that grading continuity can take place in the event of an emergency or extenuating circumstances.

- **Instructor Initiated Interaction**. Instructors will regularly initiate interaction with students on a group or one-to-one basis. The instructor should be cognizant of the degree to which students are participating in the course and review such participation regularly – similar to how a face-to-face instructor is constantly aware of how many students are attending and participating in the class. Based on the Distance Education Guidelines (2019 Draft) published by the CCC Chancellor's Office, the DE instructor is responsible for initiating regular contact with students to verify their participation and performance. Note that responding to queries from students alone does NOT meet this criterion.

- **Student to Student Contact.** Faculty will ensure ongoing regular and substantive student to student contact. Best practices include implementing communication means for varied types of interaction in the course design, assigning and monitoring weekly 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 Canvas 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 Canvas or directly to a publisher's site. Canvas enables LTI integration of publisher content with a single sign on. This integration allows faculty to keep all student data within Canvas 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.

- **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, collegewide 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
- 2019DEETACdraft

Appendices

Appendix A: Instructor to Student Contact

These contacts are initiated by the Instructor. Consult the list for the kinds of contacts considered to be regular, substantive or combined (regular and substantive).

Regular
- Minimum of twice per week
- Academic or operational in nature (operational ok?)
- Predictable, built into course design

Substantive
- Minimum of once per week
- Addressed to entire class, group of students, or individual student
- Content must be subject specific and academic in nature

Type of Contact	Regular	Substantive
Lecture		● Synchronous lectures with student participation ● Recorded (asynchronous) lectures that are available on LMS/Canvas (be aware of privacy issues)
Personal Communication	● Personal communication to individual students, subset of students (but not all students enrolled in the course) ● Expectation that student inquiries are answered in no more than 48 hours	● Personal communication with student

Announcements	- Academic or <mark>operational</mark> 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 <mark>(substantive?)</mark> - Announcements that have threaded discussion opportunities
Discussions	- 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
Assignments	Instructor participation in online group collaboration projects	Instructor participation in online group collaboration projects
Office Hours	Virtual office hours that address specific student academic concerns or needs	

| Other | ● Gradebook Comments· Review sessions that address specific student academic concerns or needs
● Opportunities for questions and answers in chat room | ● Gradebook comments
  ● Must go beyond "great job," or simple compliments.
  ● Includes a personal address like "Hello, Teresa.."
● Timely feedback must be substantive and provide the student an opportunity to reuse the feedback and apply/transfer to other skills, concepts, attitudes, or knowledge.
● 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) |

Appendix B: Student to Instructor Contact (Student initiated)

These contacts are initiated by the **Student to the Instructor**. Consult the list for the kinds of contacts considered to be regular, substantive or combined (regular and substantive).

Regular
- Course design should ensure a minimum student contact opportunities twice per week
- Academic or operational in nature (operational ok?)
- Predictable, built into course design (optional language for bullet #1)

Substantive Student Contact
- Minimum of once per week
- Addressed to entire class, group of students, or individual student
- Content must be subject specific and academic in nature

Type of Contact	Regular	Substantive
Lecture		- Synchronous lectures with student participation - Asynchronous lectures with threaded discussion
Personal Communication	Personal communication from individual students to instructor to check in	Personal communication between student and 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 threaded discussion opportunities (substantive?)
Assignments	Student feedback or reflection on an assignment	Student feedback or reflection on an assignment
Office Hours	Virtual office hours that address specific student academic concerns or needs	
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)

Appendix C: Student to Student Contact

These contacts are initiated by the **Student** <mark>but designed into the course activities</mark> Consult the list for the kinds of contacts considered to be regular and substantive.

Regular and Substantive
- Course design should ensure a weekly student to student contact opportunities
- Academic in nature (<mark>operational ok?</mark>)
- Predictable, built into course design (optional language for bullet #1)
- Minimum of once per week
- Addressed to the entire class, group of students, or individual student peer.

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.

Peer Review

- Instructors assign students to peer review groups to evaluate and give feedback, observations, and suggestions on peers' assignments or projects.

Student-to-Student Q & A

- Instructors provides 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 monitors the forum regularly.

Third Party Tools for Student-to-Student Interaction

- When third party tools are used for student-to-student contact, instructors should use the District LMS to document the interaction.

Appendix D : Training Requirements

tbd