

Distance Education: Regular & Effective Contact

This document provides Academic Senate guidance for faculty who teach online, whether it be only a portion or all of their course instruction in any given term.

Introduction: Rationale

Communication Matters—Especially in Distance Education

As faculty, we have relationships with our students that require effective communication. When we add in the element of educating students from a distance, we have to devote more attention to how we communicate, both in terms of frequency and content.

In online classes, there are no classroom doors or windows to observe what is taking place between students and faculty, so federal and state regulators have respectively invented the term “Regular and Substantive” and “Regular and Effective” to define the interactive “contacts” between faculty and students and between students in distance education.

For ease of use, this document first provides specific graphic summaries of Regular Effective Contact recommendations, supported by a detailed explanation of the legal context and regulatory language¹. The Distance Education Committee recommends that you read the entire document for a comprehensive understanding of the REC/RSI (Regular Effective Contact or Regular Substantive Interaction) requirements.

¹ See appendix A for the legal and policy language

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Interactions Table: Minimum Number of Interactions by “Seat time” Hours

The table below identifies the minimum number of RECs class type and frequency of meeting. As stated previously, while there is no requirement on the *length* of each contact, each contact should meet the definition of being “regular” (or “predictable”) and “substantial” (“effective”), as clarified in Title 5.

Class Type	# of Units	In-person hours per week	Online “hours” per week*	Minimum # REC Online Contacts per week
100% in-person (16-week)	3	3	0	0
100% in person (8-week)	3	6	0	0
100% online (16-week)	3	0	3	3
100% online (8-week)	3	0	6	6
100% online (16-week)	2	0	2	2
100% online (8-week)	2	0	4	4
100% online (16-week)	1	0	1	1
100% online (8-week)	1	0	2	2
100% online (16-week)	0.5	0	0.5	1-2
50% online (16-week)	3	1.5	1.5	1-2
50% online (16-week)	2	1	1	1-2
50% online (8-week)	2	2	2	2

* Online “hours” per week is the expected instruction hours that students would have that replace the in-person hours (the hours they would spend in the classroom in a traditional face-to-face class). This does not mean that the instructor’s contact length must be equivalent to 50 minutes. Please see Appendix A for examples of types of contacts.

Suggested Methods: Faculty-Initiated REC/RSI

There are a variety of ways courses can be designed to incorporate and demonstrate REC/RSI and that faculty can use to meet the requirements.

Assessment Tool

The California Community Colleges’ California Virtual Campus-Online Educational Initiative (the CVC-OEI) established a best-practices rubric for online education that is a helpful guide for measuring the effectiveness of REC/RSI.² Consider aligning your practices with those exemplary practices outlined in the rubric.

Suggestions for Incorporating REC/RSI into Online Courses

The following table identifies ways faculty can incorporate REC/RSI into a fully online course:

² The OEI Rubric can be found at <https://cvc.edu/wp-content/uploads/2018/10/CVC-OEI-Course-Design-Rubric-rev.10.2018.pdf>

Suggestions for Incorporating REC/RSI into Online Courses

Where	How	Accomplishes
Syllabus	<ul style="list-style-type: none"> • Include Contact Methods/Policies: on-campus and virtual office hours, phone or Zoom conference options, or any other way that students can reach you 	<ul style="list-style-type: none"> • Student-to-Faculty interaction • Sets tone for desire to encourage interaction
Syllabus	<ul style="list-style-type: none"> • Identify expected response times to student's inquiries (e.g., will respond to questions within 24 hours, assignments will be grade within 1 week) 	<ul style="list-style-type: none"> • Communicates reducibility of communication
Announcements	<ul style="list-style-type: none"> • Use to provide general feedback on assignments, changes in schedule, clarification of content, reminders of assignments & tests (multiple times a week) • Refer to students by name, where appropriate • Can be written and/or video announcements 	<ul style="list-style-type: none"> • Demonstrates interaction with course content • Communicates that the instructor is "present" in the course (it's not a correspondence course) • Allows for "re-teaching" or emphasizing course content/overarching themes
Discussion	<ul style="list-style-type: none"> • Include in the course and encourage students to respond to multiple peers • Post reactions, comments, and questions in the discussion or as feedback using another method (e.g., Announcement) • Provide a Q&A Forum or Questions about the Course to encourage students to interact with the instructor and others about course design, concepts, etc. (and monitor/respond) 	<ul style="list-style-type: none"> • Sense of community and students getting to know other students (and faculty) • A feeling that the students' contributions are read and valued • Increased likelihood that students will feel comfortable about contacting the instructor with questions/clarification
Assignments	<ul style="list-style-type: none"> • Group Projects using Canvas' People function • Smaller group discussions • Peer Reviews 	<ul style="list-style-type: none"> • Students interacting with each other to complete a project
Feedback/Grades	<ul style="list-style-type: none"> • Create and use rubrics to offer detailed feedback on assignments/discussions • Add comments to Discussion Board or Assignment submissions (even if no submission was made) • Use SpeedGrader's annotation option when grading assignments (and give students instructions on how to read those annotations) • Consider adding audio or video feedback comments. 	<ul style="list-style-type: none"> • Demonstrates a desire to help students do well • Shows that attention is being paid to submissions • Encourages students to submit assignments (and that a missing submission was noticed) • Humanizes the instructor
Other	<ul style="list-style-type: none"> • Include a welcome video, pictures, etc. • Online office hours • Encourage student study groups (provide instructions on how to create a student group) • Request feedback via a discussion board or anonymous surveys 	<ul style="list-style-type: none"> • Humanizes the instructor • Encourages student-to-student interaction • Creates a climate of encouraging student feedback

If "seat time" hours are 1 hour a week or less, the **minimum** number of RECs is **at least** one a week.

Regulatory Context:

In hybrid or fully online courses, ensuring Regular Effective Instructor/Student Contact (REC) guarantees that the student receives the benefit of the instructor's presence in the learning environment both as a provider of instructional information and as a facilitator of student learning.

Title 5 regulations specify that "any portion of a course conducted through distance education (DE) includes regular effective contact between instructor and students" (Title 5 Regulation Sect 5520).

In 2019, Title 5 of the Ed Code became more specific in terms of how we, as online faculty, communicate with our students and how we facilitate interaction between students; it also added a requirement that official curriculum outlines specify the scope of REC in each course.

Colleges are also required to develop a policy regarding regular effective contact that addresses "the type and frequency of interaction appropriate to each DE course/section or session" (Distance Education Guidelines for the California Community Colleges). Because this is an academic and professional matter, the college's academic senate establishes these guidelines.

State vs. Federal definitions of Regular Effective Contact: Legalese

The terminology you are likely to encounter is **Regular and Effective Contact** (REC) or sometimes **Regular Substantive Interaction** (RSI).

The two terms differ depending on the source, the state definition of **Regular Effective Contact** coming from the California Education Code (Title 5 Regulation Sect 55204) and the federal definition of **Regular Substantive Interaction** coming from The Department of Federal Regulations (Title 34 §600.2) and is defined as "between the students and the instructor, either synchronously or asynchronously." The ACCJC has used the federal definition of distance education in its instructions to colleges regarding accreditation standards.

REC/RSI is how we differentiate our courses from a DIY or Correspondence course. This is a critical distinction because of the ways Distance Education courses do and Correspondence courses do not afford their institutions federal Financial Aid eligibility. In other words, REC is what proves that our students are eligible to receive federal financial aid.

Regular effective contact must be achieved in the following ways:

- Faculty-initiated
- Subject-matter related (and more than just a grade or perfunctory comments such as 'good job' or 'great work.')
- Regular and predictable (mandatory; not "optional")
- Between student and student
- Between faculty and student
- Between student and course materials
- Via multiple channels (e.g., not all announcements)
- And at least as much as a face-to-face course would be

What This Means for DE Courses

What: Types of “Interactions”

REC/RSI needs to occur with the class as a whole (or with *each* individual student). An email sent by a faculty to a single student may meet the requirement of an interaction with that student but, unless an email is sent to every student (they are all involved in an interaction), it does not meet the criteria of REC/RSI.

Interactions must occur in **all** of the following three contexts:

- **Faculty-initiated interaction with students** must be regular (e.g., at least once a week) and related to course content (often via announcements, discussion boards, video conferencing, etc.)
- **Students-initiated interaction with faculty** means that students must have the ability to contact the faculty and get a response within a reasonable time period
- **Student-to-student interaction is required** as well (consider discussion boards, peer feedback, and group projects)

How Often: Frequency of Interactions

Further, these interactions must be “regular and predictable” and “at least as much as a face-to-face course would be.”

Regular & Predictable

Consider a traditional on-ground course that meets twice a week:

- The instructor would interact with students at least twice a week, meaning at least two regular and predictable contacts related to the course material
- Students would contact faculty outside of class by coming to office hours, emailing, etc.—or at least would feel they could do it
- And students would often be interacting with each other through discussions, group activities, group projects, etc.

Students would know or could predict that they would see their faculty every Tuesday and Thursday and would expect to communicate with their instructor then. That’s when they could ask questions, get new content, etc. (“Regular and Predictable”).

How Many: Amount of Interactions

To determine how much “at least as much of a face-to-face course would be,” consider the following:

- In a 3-unit lecture class with 54 hours of instruction (“seat time”) offered in a traditional 16-week semester, the faculty would communicate with the student at least 32 times, or 2 “REC” times a week.
- In a condensed 8-week course, you could make the same argument: 32 times, or 4 times a week. Again, that would result in 32 “contacts” over the term of the course.

Further, consider what often occurs in a single “in-class” session: Reminders of upcoming assignments, feedback on submitted assignments, instruction, facilitated discussions, answering questions, clarification of concepts/assignments/schedules, facilitated group activities, etc. The argument can be made that each of these could be a separate contact

These same types of interactions (faculty-to-student, student-to-faculty, and student-to-student) need to be woven into a distance education course. This also applies to courses that are delivered partially online (e.g., hybrid course); regular and predictable interaction should take place for the distance education portion of the course.

Using the concept of “seat time” or Carnegie hours, students in a traditional 3-unit lecture class meet with faculty 3 hours a week (for our purposes, a 50-minute class period is considered 1 hour and an 80-minute class session is considered 1.5 hours). This could be all at one time (e.g., a 1-night a week, 3-hour class), split up into 2 days a week (80 minutes each session), split up into 3 days a week (50 minutes each session), etc.

The concept is the same for hybrid classes, which could meet physically 1 hour a week and virtually 2 hours a week. Or, meet physically for 2 hours and virtually for 1 hour each week. Or any combination.

To meet the minimum number of RECs per week, there must be at least 1 REC for each hour of “seat time.” Additionally, for courses meeting for less than 1 hour per week, the minimum number of RECs is at least once per week.

While there is no requirement on the *length* of each contact, each contact should meet the definition of being “regular” (or “predictable”) and “substantial” (“effective”), as clarified in Title 5.

Online Labs

All labs (on-ground or online) require faculty supervision, which means that students must have faculty guidance or intervention in order to complete tasks assigned in the lab (e.g., faculty help them navigate software or a specific activity that they cannot complete on their own). (*If faculty intervention or guidance is **not** required, it is not lab work.*)

Regardless, just as in an on-ground class, the expectation is that the faculty interacts with the student on a regular and predictable basis and that students are interacting with others in some way. Labs could be designed to include group projects, peer review, discussion boards, etc.

Appendix A: Associated Regulations:

A1. State Regulations

Title 5 and the Distance Education Guidelines for the California Community Colleges state:

55204. Instructor Contact.

In addition to the requirements of section 55002 and any locally established requirements applicable to all courses, district governing boards shall ensure that:

- (a) Any portion of a course conducted through distance education includes regular effective contact between instructor and students, and among students, either synchronously or asynchronously, through group or individual meetings, orientation and review sessions, supplemental seminar or study sessions, field trips, library workshops, telephone contact, voice mail, e-mail, or other activities. Regular effective contact is an academic and professional matter pursuant to sections 53200 et seq.

(b) Any portion of a course provided through distance education is conducted consistent with guidelines issued by the Chancellor pursuant to section 409 of the Procedures and Standing Orders of the Board of Governors.

Note: Authority cited: Sections 66700 and 70901, Education Code. Reference: Sections 70901 and 70902, Education Code.

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A2. Federal Regulations

The Federal Regulations are addressed by the Department of Education Code of Federal Regulations Title 34 §600.2

Distance education means education that uses one or more of the technologies listed in paragraphs (1) through (4) of this definition to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may 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 conferencing; or

Video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3) of this definition.⁴

A3. LRCCD District Regulations

While no specific guidelines are provided by LRCCD's District Regulations in R-7145,⁵ LRCCD Board Policies specify the requirement to have "regular substantive and effective contact":⁶

3.5 Any portion of a course conducted through distance education shall include regular substantive and effective faculty initiated contact with students. The determination of regular substantive and effective contact is an academic and professional matter. (34 C.F.R. § 602.3; Title 5, § 55204, subd. (a))

³ Retrieved from gov.westlaw/com:

[https://govt.westlaw.com/calregs/Document/I30AFD0EF02B449E187E6485AB412054F?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I30AFD0EF02B449E187E6485AB412054F?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

⁴ Retrieved from Cornell Law: <https://www.law.cornell.edu/cfr/text/34/600.2>

⁵ Reviewed at <https://losrios.edu/docs/lrccd/board/regulations/R-7145.pdf>

⁶ Retrieved from <https://losrios.edu/docs/lrccd/board/policies/P-7145.pdf>