

## Proposed Change to DH/DL Review Process

### Summary:

In alignment with new standards announced by our accrediting bodies and best practices in distance education, the Office of Distance Education suggests a modification of required documents and review practices in ASCC to update from assessing “direct and indirect instruction” to assessing “Regular, Substantive Interaction (RSI)” in Distance-Enhanced and Distance Learning courses.

Proposed changes would be made 1) to the [ASC Syllabus Template](#) to deemphasize direct and indirect instruction in the “how this Online Course Works” section of the syllabus as well as 2) to the [ASC Distance Learning Cover Sheet](#) to remove the content referencing direct instruction, insert a new section on RSI, and amend passages in the Cover Sheet where RSI overlaps with other categories, such as Instructor Presence and Workload Estimation, for clarity. 3) As with other existing categories for ASC DH/DL review, a new webpage page in the [ASCODE curriculum support area](#) will be published so instructors can learn more about RSI, access resources for integrating more regular and substantive interaction in their course designs and describe them clearly in the course syllabus for curriculum review.

### Justification:

ASCODE recommends the College adjust its criteria for assessing online course proposals away from the direct/indirect instruction model we have used in recent years in favor of the Regular and Substantive Interaction Model because we believe this model will support clearer course review standards, innovative course design strategies, and transition us to a model that is now being used to define and assess online courses and programs by the Department of Education, accrediting organizations, and the State of Ohio. In short, it keeps the review process in alignment with contemporary thinking and current standards.

Difficulties review committees have experienced (discussed at length in the April 7<sup>th</sup>, 2023 meeting) experienced by the outmoded direct-indirect model for assessing appropriate levels of instruction in DH/DL courses will be alleviated by changing frameworks. At that meeting, ASCODE was asked to provide guidance for a clearer way forward--this recommendation serves as that guidance.

### Background:

As previously noted, the concept of direct instruction was not originally intended to evaluate online courses. Rather, this was a measure used to distinguish traditional classroom higher education learning experiences from correspondence educational

experiences, for the purpose of consumer protection and upholding federal laws related to administering federal education funds and student financial aid.

Thus, the definition of credit-hours became tied with classroom instruction, which became known as “direct instruction.” The Federal Department of Education (and consequently, States and accreditation organizations) have been slow to realize the shortcomings of this lens for evaluating online courses. However, there have recently been significant, though somewhat vague, adjustments.

Exigencies for continuing teaching during the COVID-19 pandemic forced additional attention on online instruction, accreditation standards, and quality assurance; and a series of stop gap policies and guidelines were put into place to allow for the shift to emergency online instruction. Since then, the U.S. Department of Education, accrediting bodies, and distance education professional organizations have provided clarification based on best practices in distance education that suggests a move away from a direct instruction-focused assessment of distance learning courses toward an RSI model for quality assurance and standards compliance.

In the OAA Academic Organization, Curriculum, and Assessment Handbook, the following definition of credit hours is provided:

*One semester credit hour will be awarded for a minimum of 750 minutes of formalized instruction that typically requires students to work at out-of-class assignments an average of two hours for every hour of formalized instruction. The instructor bears the primary responsibility for formalized instruction, which may be delivered in a variety of modes.* ([https://oaa.osu.edu/sites/default/files/links\\_files/OAA%20handbook%2021-22\\_0.pdf](https://oaa.osu.edu/sites/default/files/links_files/OAA%20handbook%2021-22_0.pdf) (page 119))

This policy is also referenced on various other OSU websites, including the [Teaching and Learning Resources Page](#).

This definition seems to stem from [Ohio Administrative Code Rule 3357](#), which was updated in 2020 to specify this classroom instruction applies specifically to “classroom instructional arrangements.” In late 2021, [a new rule, 3332, was added to the Ohio Administrative Code](#) that provided updated minimum standards for distance education courses and programs in which references to direct/classroom instruction are omitted in favor of suggestions that institutions, “provide for methods of timely and systematic interaction between students and faculty.”

This change in the way in which the State of Ohio defines and assesses distance education courses and programs was made in response to clarifying statements made by the US Department of Education and accreditation standards revised by the Higher Learning Commission.

On July 1, 2021, the U.S. Department of Education released the final set of proposed regulations stemming from the 2019 Negotiated Rulemaking process (the Distance Education and Innovation Regulations). As part of these regulations, the definition of “distance education” in Chapter 34, §600.2 was updated, including specifically defining the critical terms: instructor, regular, and substantive. The DoE published a [Distance and Innovation Fact Sheet](#) explains the policy history and recent changes, while also acknowledging that future clarifications will likely be needed. This was an important update, as “regular and substantive interaction” is what distinguishes “distance education” from correspondence, which has important implications for federal financial aid eligibility.

The Higher Learning Commission has updated its own language on this issue as well, now defining *distance education* as “Education that uses one or more of the technologies listed below 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.”

Regular and Substantive Interaction is not a new concept or category of analysis, though it has taken on a more significant role in distinguishing distance from correspondence education. Many resources are available to reframe local standards for ASCC course reviews. The OSU [Teaching and Learning Resource Center has an existing resource defining RSI](#). Additionally, the [OSCQR SUNY Online Course Quality Review Rubric and Process](#), which has become the gold standard in assessing quality online courses and programs, [provides several specific measures for identifying the presence if RSI in course reviews](#). While changes are likely to be ongoing as new modes of instruction take shape in the context of fast-paced learning technology innovation, ASCCC would do well to adopt an more expansive, and up-to-date understanding of this standards category to continue to foster high-quality distance education experiences for students in ASC courses.

#### **Additional Resources:**

This is one of the clearer articulations of what this change looks like from a course quality review perspective: <https://www.niu.edu/citl/online/standards-and-principles/regular-and-substantive-interaction.shtml>

This is an additional summary of recent regulatory/definitional changes relevant to RSI: <https://wcet.wiche.edu/frontiers/2022/11/08/regular-substantive-interaction-update-where-do-we-go/>