## Mt. SAC Academic Senate

# **Regular and Effective Contact Task Force**

# **Final Summary**

October 17, 2019

## **Purpose and Function Statement**

# **The purpose and function of the REC Task Force is to:**

* Review relevant federal and state laws and regulations and accreditation standards on regular and effective contact (or its substantial equivalent) for distance learning courses taught at Mt. SAC.
* Provide recommendations on how regular and effective contact should be defined on the campus.
* Create a rubric that identifies regular and effect contact (per Article 13A.4).
* Provide recommendations on any required changes to existing Board Policies and Administrative Procedures (specifically AP 4105) so as to memorialize that definition and recommendations.
* Suggest a process for deployment and use of the REC rubric.\*
	+ This purpose statement was adopted on May 8 after consultation with Eric Kaljumagi and Chisa Uyeki, and amended after consultation with the district and FA over summer 2019.

## **Membership**

## Carol Impara (CSDT, chair)

Hansel Alvarez (English)

Terri Beam (Chemistry)

Mike Dowdle (Psychology)

Ed Estes (Real Estate)

Hong Guo (Library)

Dionne Loera-Ramirez (English)

Catherine McKee (Paralegal)

## **Methods of Consultation**

## The Task Force met once in person, on March 13, 2019, and six times via ConferZoom during Spring and Fall 2019. All meetings were scheduled for one hour, although a meeting ran long once. Agenda, minutes, and all resources were included in the Canvas course shell created for the Task Force and made available to the Task Force about a week before the scheduled meeting. Final approvals were made via email.

## **Background of the Topic that Led to the Task Force**

## The creation of the Task Force was in response to negotiated language in the Agreement between the Faculty Association and Mt. SAC district, Year 2.

13.A.4. There shall be a certification process for regular and effective contact. The Academic Senate in consultation with the Faculty Association and the District will create a rubric that identifies regular and effective contact. The rubric will be used only to determine regular and effective contact. This certification process is separate and distinct from the SPOT certification process.

13.A.5. A certified chair or certified designee may be granted access after a two (2) day notification period for no longer than one (1) week to visit a DL course to ensure that regular and effective contact is occurring. This observation shall occur after the 40% mark of the course. A follow-up written communication will be sent within two (2) weeks of the observation to the professor, to the department chair, and to the appropriate manager. If regular and effective contact is not evident during this observation, the professor may request a second review by a certified manager. The second review shall be in consultation with the professor. If the review does not find adequate regular and effective contact, a professor may be required to repeat SPOT certification or recertification in order to maintain eligibility for teaching DL courses. Teaching DL courses is subject to college need and loss of eligibility is not in itself a disciplinary action. No disciplinary action or evaluation will result from these observations.

## **Information Findings from the Task Force**

## Regular effective contact, also known as regular substantive interaction in federal language, is broadly defined in both federal and state regulations. Professor-initiated contact is one of the essential ways that online distance education courses are differentiated from correspondence courses. Federal financial aid is not given for correspondence courses.

## Neither federal, state, nor accrediting agencies mandate a required number of professor-student interactions to qualify as regular and effective contact.

## Federal guidelines merely specify that distance education contact that is professor-initiated differentiates it from a correspondence course. A proposed addition to these regulations, which was not adopted, identified once per week as a minimum number of professor-initiated contacts, but later drafts did not include that language.

## State guidelines add that online courses must enable student-student interaction.

## The ACCJC does not mandate number of interactions but states that campuses must create their own standards equivalent to in-person courses, define these standards in appropriate documents, describe features of the Learning Management System (LMS) that facilitate interaction, and show evidence of faculty training on best practices for regular and substantive interaction.

* From these findings, the Task Force determined that a set number of interactions would not be mandated, but professors should demonstrate regular and effective contact in the majority (>50%) of whatever portion of their course is taught online.
1. The current “best practices” for online course design are described in CVC-OEI rubric. The OEI rubric was designed using standards from @ONE, the CCC Distance Education Coordinator’s group, the Academic Senate for California Community Colleges (ASCCC), and the CCC Chancellor’s office (CCCCO), as well as other local college and nationally established standards. The CVC-OEI rubric emphasizes the importance of using a variety of modalities in a consistent and predictable manner within a course shell.
* Using this rubric, the Task Force determined that faculty should think about the many ways that interactions occur in their in-person courses and use that understanding as a guide to design their online courses. A variety of contact methods, used consistently, best mimics what is done in an in-person course.
* The Task Force found the greatest variety in methods for professor-initiated contact. The Task Force concluded that faculty should deploy **multiple, recurring** methods of instructor-student contact. Instructor-student contact methods include participating in discussions, giving extensive individual feedback, using embedded rubrics, sending progress reports or early alerts, communicating via Inbox, email, phone, in-person, or external apps, engaging in Chat or ConferZoom conferences, making announcements via the LMS, and providing instructional materials with explanations.
* The Task Force found that the LMS provided fewer methods for faculty to enable student-student contact. Student-student interaction methods include discussions (with required replies), collaborations, wikis, and peer review. Because options are fewer, the Task Force concluded that an online course should include **recurring** methods of student-student contact but not necessarily multiple methods.
1. Federal, state, and local FERPA regulations allow school officials, including teachers, within a school to obtain access to personally identifiable information in education records provided the school has determined they have a legitimate educational interest in the information.
* From this language, the Task Force determined that it would be allowable for peer reviewers to view individualized feedback that professors gave to their online students’ assignments and discussion posts.
1. Neither federal nor state guidelines provide instructions for reviewing online courses to determine regular effective contact. The ACCJC sets guidelines for evaluating distance education which include reviewing “no fewer than 15 sections but no more than 10% of the total number of distance education sections offered in a semester” (p. 148, *Guide to Institutional Self-Evaluation, Improvement, and Peer Review*).
* Since evaluations are a negotiated item and the FA contract states that “no disciplinary action or evaluation will result from these observations,” the Task Force wished to avoid conflating a review process with the evaluation process. Hence, not all online course sections would undergo review in a discrete time frame. In addition, the REC rubric will not be used as part of the existing evaluation or special evaluation process since these are negotiated evaluation processes.
1. The Academic Senate has identified sustainability as one of three campus-wide priorities for the work of Senate committees.
* In an effort to reduce cumbersome, paper-based processes, the Task Force designed a rubric that should be used on the computer only and, hopefully, be signed and stored electronically.

## **List of Resources/People Consulted by the Task Force**

## ***Resources:***

* [Code of Federal Regulations 34 CFR 600](https://www.govinfo.gov/content/pkg/CFR-2011-title34-vol3/pdf/CFR-2011-title34-vol3-part600.pdf), existing regulations and proposed revisions
* [Title 5 55200](https://govt.westlaw.com/calregs/Document/I1E35BBE3B57046F0ABD056DC4E8F0E73?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1), including [new language in effect](https://www.asccc.org/content/title-5-and-distance-education-separate-course-review-enough#fn1) March 17, 2019
* [ACCJC Policy on Distance Education and on Correspondence Education](http://accjc.org/wp-content/uploads/Policy-on-Distance-Education-and-on-Correspondence-Education.pdf) August 2012
* [ACCJC Guide to Institutional Self-Evaluation, Improvement, and Peer Review](https://accjc.org/wp-content/uploads/Guide-to-Institutional-Self-Evaluation-Improvement-and-Peer-Review.pdf) September 2018
* ASCCC Online Education Committee (“[Ensuring an Effective Online Program: A Faculty Perspective](https://www.asccc.org/sites/default/files/OE%20Paper%20Final%203.12.18.pdf)” and “Regular and Effective Contact” presentation)
* FERPA guidelines from both [DoE](https://www2.ed.gov/policy/gen/guid/fpco/ferpa/students.html) and [California DoE](https://www.cde.ca.gov/ds/ed/dataprivacyferpa.asp)
* [CVC-OEI Course Design Rubric](https://cvc.edu/wp-content/uploads/2018/10/CVC-OEI-Course-Design-Rubric-rev.10.2018.pdf), last revised October 2018
* Roblyer, M. D., & Ekhaml, L. (2000). How interactive are your distance courses? A rubric for assessing interaction in distance learning. *Online Journal of Distance Learning Administration*, *III*(II), 1-6. Retrieved from <https://www.westga.edu/~distance/ojdla/summer32/roblyer32.pdf>
* Mt. SAC [AP 4105 Distance Learning](https://www.mtsac.edu/governance/trustees/apbp/AP4105.pdf)

***People:***
Eric Kaljumagi, Faculty Association President (2018-2019)

Chisa Uyeki, Academic Senate President

Joan Sholars, Faculty Association President (2019-20)

## **Specific, Achievable Recommendations**

## The Regular and Effective Task Force makes the following recommendations:

1. That the REC rubric created by the Task Force be adopted as the rubric used to fulfill 13A.4.
2. That the changes proposed to the REC section in AP 4105 be adopted;
3. That the process designed by the collaborative workgroup:
* Avoids all similarities to the current negotiated evaluation process for faculty;
* Allows faculty or departments to volunteer their courses prior to accreditation review, similar to the “Preflight Check” that was done before the last accreditation visit;
* Uses the ACCJC definition of peer reviewer to require SPOT-certified faculty as reviewers, rather than administrators;
* Is not reliant on a “trigger,” which implies a need for a special evaluation;
* Does not require that all course sections are reviewed in a discrete time frame.
1. That the District create easy-to-use, fillable forms that can be electronically signed and stored to minimize paper waste.

## **Statement of Disagreement/Concern by One or More Members of the Task Force**