

# AO 36: Online Course Quality Policy

## 36.1 Purpose

This policy establishes institutional standards for the design, delivery, engagement in, and quality assurance of online courses. It ensures that our online courses meet federal, state, and accreditation requirements, including those for student identity verification and regular and substantive interaction in online courses.

This policy applies to all credit-bearing online courses (asynchronous and synchronous) offered at NSU.

## 36.2 Requirements

Online courses must:

1. Provide regular and substantive interaction (RSI) between students and the instructor.
2. Be delivered through NSU's learning management system (LMS).
3. Use secure student identity verification processes that protect student privacy.
4. Align with approved school and university rubrics for course design and accessibility.
5. Undergo periodic quality review to identify any areas for improvement;
6. Offer equivalent access to all appropriate student services (advising, library services and resources, tutoring, mental health counseling, financial aid) that are available to students enrolled in face-to-face courses at NSU.

Online courses that fail to demonstrate RSI are classified as *correspondence education* and do not qualify for Title IV federal financial aid.

### 36.2.1 Regular & Substantive Interaction

All online courses must include and document regular and substantive interaction (RSI) between instructors and students.

#### 36.2.1.1 Examples that Meet RSI Requirements

These examples demonstrate possible means of achieving RSI and are not an exhaustive or prescriptive list.

<b>Regular Interaction</b> <i>(Instructor-initiated, scheduled, predictable engagement)</i>	<b>Substantive Interaction</b> <i>(Academic engagement promoting learning and feedback)</i>
Weekly course announcements in the LMS summarizing content and upcoming tasks.	Direct instruction through recorded, written, or live lectures.
Consistent posting schedule (e.g., weekly or module-based instructor messages).	Offering individualized feedback on assignments or assessments.
Scheduled virtual office hours (e.g., same day/time weekly).	Leading or moderating online discussions tied to course objectives.
Weekly instructor presence in the LMS (discussion replies, announcements).	Providing clarifications, examples, or demonstrations of complex concepts.
Timely responses to student messages (within timeframe stated in syllabus).	Facilitating peer-review activities and offering guidance on student contributions.
Regular progress updates or reminders of due dates and milestones.	Assessing student work and supplying targeted, formative feedback.
Instructor check-ins midway through a module or unit.	Responding to student questions about course content or assignments.
Ongoing instructor communication outlining next steps in learning.	Holding live review sessions or Q&A meetings to reinforce key ideas.
Routine use of announcements to re-engage inactive students.	Providing supplemental resources with commentary explaining their relevance.
Consistent instructor engagement noted in the course analytics (e.g., weekly logins, post activity).	Designing interactive learning activities, with the instructor giving feedback on student outcomes.
Regular opportunities for student-instructor interaction via discussion boards or chats.	Evaluating student performance through authentic assessments and explaining improvement strategies.
Predictable schedule for graded activities and posting of assignment/exam grades, as stated in the syllabus.	Providing follow-up feedback on earlier work to document progress toward outcomes.

(Adapted from the University of Texas Rio Grande Valley RSI Checklist and U.S. Department of Education guidance)

### 36.2.1.2 RSI Verification

The Division of Academic Affairs conducts audits to verify RSI compliance at least twice during any courses lasting 12 weeks or longer, with one audit occurring before and one

after the mid-point of the term; shorter courses will be audited at least once. Audits are based on LMS activity reports; supplemental documentation of compliance may include discussion participation records, instructor feedback examples, and course announcements. Instructors whose courses fall below RSI thresholds will be contacted by their supervisor within 3 working days to revise course interactions to meet RSI requirements.

Repeated failure to meet online course quality standards may result in suspension of the instructor from teaching online or suspension of all online courses in a program until issues are corrected. Performance evaluations and annual outcomes assessments must confirm that syllabi, course design, and faculty engagement practices meet institutional RSI standards. Documentation related to RSI compliance will be incorporated into program reviews and accreditation self-studies.

### **36.2.2 Student Identity Verification**

NSU maintains an effective process to verify the identity of students enrolled in and completing online courses and programs. All identity verification processes must protect student privacy and comply with FERPA and applicable data-protection laws. The Division of Academic Affairs, in collaboration with the Office of Information Technology Services, periodically reviews identity verification systems to ensure compliance, privacy protection, and technological integrity.

#### **36.2.2.1 Verification Methods**

Identity verification includes the following:

1. Secure login credentials to the institutional LMS.
2. Photo ID verification during timed and proctored online examinations.
3. Identity verification that meets these minimum requirements:
  - a. At least one identity verification assignment within the first three weeks of courses lasting 12 or more weeks (within the first week of shorter sessions).
  - b. For courses without a proctored final exam, at least one additional identity verification assignment during the final four weeks of sessions lasting 12 or more weeks (within the final week of shorter sessions).
  - c. Identity verification assignments can vary from a proctored exam, synchronous video interaction (e.g., live class instruction or office hours), or asynchronous video presentation (e.g., student-created videos).

#### **36.2.2.2 Privacy and Transparency**

NSU must inform students in writing at the time of enrollment about:

1. The identity verification procedures used.
2. Any current or projected fees or charges associated with those processes. Any costs related to identity verification are clearly itemized in tuition and fee schedules.

Each school regularly reviews and updates standardized LMS syllabus templates, including language on privacy protections when using identity verification methods such as exam proctoring. The Center for Teaching and Learning Excellence (CTLE) integrates updated content into Canvas course templates.

### 36.2.3 Student Complaints

NSU's Student Complaints Policy (AO 22) establishes procedures for students to file a complaint if they have evidence that an online course does not comply with NSHE requirements regarding distance education courses or that NSU has engaged in deceptive trade practices and/or fraud (see NSHE Handbook Title 4 Chapter 14, Sections 25-27).

## 36.3 Roles & Responsibilities

Academic units are responsible for assessing program and course outcomes, including those delivered online. Assessments evaluate course effectiveness, achievement of learning outcomes, and student success metrics, and findings are included in annual assessment reports. Performance evaluations and annual outcomes assessments must confirm that syllabi, course design, and faculty engagement practices meet institutional RSI standards. Documentation related to RSI compliance will be incorporated into program reviews and accreditation self-studies.

### 36.3.1 Instructor Responsibilities

The minimum requirements for online course design and instruction are aligned with the University's Promotion and Tenure expectations for a Satisfactory rating in Teaching. These standards align with institutional expectations for online teaching quality.

To comply with accreditation requirements regarding RSI, online instructors must engage in at least two of the following categories of activity:

1. Providing direct instruction.
2. Assessing or providing feedback on student coursework.
3. Providing information or responding to questions about course content.
4. Facilitating group discussions related to course material (or equivalent activities that engage students).
5. Other instructional activities that promote student learning and are approved by the University.

### 36.3.2 Instructor Training and Support

The CTLE must provide appropriate trainings, consultations, and support for new and continuing instructors on the following topics:

- RSI in online courses.
- ADA accessibility.
- Assessment and identification verification best practices.

The CTLE provides professional development and support on other teaching and learning topics, such as active learning, Universal Design for Learning (UDL), and rubric development.

Academic faculty are expected to participate in periodic refreshers or update training to remain current with evolving technologies, teaching methods, and compliance expectations for online education. Instructors should submit evidence of professional development participation, and implementation of what they learned, in annual review and other evaluation materials.

To ensure training meets the needs of instructors, the CTLE will periodically review its offerings related to online teaching and learning, including:

- Reviewing training materials to ensure alignment with accreditation standards and evidence-based practices.
- Reviewing all units’ annual outcomes assessment reports to evaluate areas where faculty need additional support to meet compliance standards.
- Soliciting feedback from faculty participating in training.

### 36.3.3 Summary of Responsibilities

Unit/Office	Responsibilities
Academic Affairs	Policy oversight, compliance monitoring, program and course assessment support, and accreditation reporting.
CTLE	Designs and offers relevant, evidence-based faculty training (e.g., RSI, accessibility, proctoring exams); supports online course quality assurance program.
ITS	Implements and maintains secure identity verification systems and LMS access.
Deans & department chairs	Observe and evaluate courses and program assessment reports to ensure faculty compliance and quality standards; follow up with instructors flagged in RSI audits.
Instructors	Design and deliver courses that meet RSI, accessibility, and design standards; participate in periodic refresher/update trainings; submit evidence of professional development participation (and results of implementation) in annual review and other evaluation portfolio; address concerns flagged in RSI audits.

### 36.4 Related Information

- NWCCU [Distance Education and Correspondence Education Policy](#) and [Standards](#)
- Council of Regional Accrediting Commissions (C-RAC) “[Interregional Guidelines for the Evaluation of Distance Education](#)”

- [34 CFR 600.2 Distance Education](#)
- [NC-SARA Policy Manual](#)
- [Promotion and Tenure](#) Policy
- NSU Student Complaints Policy, AO 22 Section 22.1(5) – Basis for Complaints: *Failure to meet NSHE requirements for distance education courses*
- NSHE [Handbook Title 4 Chapter 14](#), Section 25 – Deceptive Trade Practices and Acts of Fraud Prohibited; Section 26 – State Authorization Reciprocity Agreement: Student Complaints and Appeals; Section 27 – State Authorization Reciprocity Agreement: Institutional Appeals and Process

### 36.4.1 Revision History

- Approved by Dr. Raul Tapia, 5/3/2026; Deans Council, 5/8/2026;