



GOLDEN GATE UNIVERSITY

Distance Education Policy

This manual outlines Golden Gate University's policies, procedures, and quality standards for distance education, ensuring compliance with institutional policies, applicable regulations, and the C-RAC Interregional Guidelines for the Evaluation of Distance Education. It integrates best practices adapted from peer institutions while reflecting GGU's unique governance and operational structures.





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1. Introduction and Purpose

Golden Gate University (GGU) is committed to delivering high-quality educational experiences that meet the needs of diverse learners, including those who pursue their studies partially or entirely online. This Distance Education (DE) Policy Manual establishes the framework, standards, and procedures for developing, delivering, and evaluating distance education at GGU. It is designed to ensure full compliance with the University's mission and strategic plan, the Western Association of Schools and Colleges Senior College and University Commission (WSCUC) accreditation standards, the Council of Regional Accrediting Commissions (C-RAC) *Interregional Guidelines for the Evaluation of Distance Education*, and all applicable federal and state regulations.

For the purposes of this policy, distance education is defined as instruction in which students and faculty are separated by physical location and interact primarily through electronic means, with **regular and substantive interaction (RSI)** as required by federal regulations. This definition applies to all courses and programs delivered fully online as well as hybrid formats where online instruction constitutes a significant portion of the learning experience.

The scope of this policy extends to all academic units, Distance Education Learning Partners, programs, and faculty engaged in DE, as well as to the academic and student support services provided to distance learners. It establishes expectations for curriculum quality, faculty qualifications, student services, technology infrastructure, accessibility, governance, and continuous improvement. By applying these standards, GGU ensures that its DE offerings are equivalent in academic rigor, learning outcomes, and student engagement to traditional on-campus courses.

The goals of this policy are to maintain academic integrity, ensure equitable access to resources and support, provide clear governance and accountability for DE operations, and promote ongoing assessment and improvement. Through systematic evaluation and alignment with best practices in online learning, GGU affirms its institutional commitment to serving students effectively in all modalities.

This policy is administered by Academic Affairs in collaboration with faculty governance bodies and administrative units. It will be reviewed on an annual basis, or more frequently as needed, to ensure continued relevance and compliance.





2. Mission Alignment and Institutional Commitment

Golden Gate University (GGU) affirms that distance education (DE) is a central component of its mission to deliver high-quality, practice-based education to working professionals, lifelong learners, and diverse student populations. DE extends access to academic programs without compromising the rigor, integrity, or learning outcomes established for traditional instruction.

2.1 Alignment with Institutional Mission

- DE initiatives support GGU's mission by offering flexible, accessible pathways to degree completion for students regardless of location, in line with GGU's commitment to offering programs that work for working adults.
- Courses and programs are designed to reflect the University's commitment to workplace alignment, academic excellence, and inclusivity.
- DE delivery is held to the same quality standards as on-campus instruction, with parity in curriculum, faculty engagement, and assessment practices.

2.2 Institutional Commitment to Distance Education

- **Strategic Integration** – DE is embedded within the University's strategic plan, with defined goals for expansion, quality enhancement, and student success.
- **Resource Allocation** – Budgets provide sustained funding for learning management systems, instructional technology, faculty training, and online student services.
- **Leadership Oversight** – The President and Provost ensure DE initiatives align with institutional priorities and accreditation standards.
- **Compliance Assurance** – DE operations meet or exceed WSCUC accreditation requirements, federal regulations, and applicable state authorization standards.

2.3 Faculty Role and Governance Engagement

- Faculty maintain primary responsibility for academic content, learning outcomes, and instructional design in DE courses.
- The subcommittee of the Faculty Senate, Committee on Academic Standards, governs program approval, review, and the continuous improvement processes.
- Standards for faculty qualifications and online teaching practices are consistent with institutional policy and accreditation expectations.





2.4 Demonstrated Commitment to Access and Success

GGU's commitment to DE is evidenced by:

- Maintaining a broad portfolio of online programs across multiple disciplines.
- Ensuring equitable access to advising, library resources, tutoring, and career services for online students.
- Continuously evaluating DE programs for effectiveness, student satisfaction, and workforce relevance.

3. Governance, Planning, and Oversight

3. Governance, Planning, and Oversight

Golden Gate University (GGU) maintains a clearly defined governance structure for the planning, delivery, and oversight of distance education (DE) programs. This framework ensures DE operations are strategically aligned with the University's mission, meet accreditation and regulatory requirements, and uphold the highest standards of academic quality and student success.

3.1 Governance Structure

Oversight of DE is a shared responsibility between academic and administrative leadership:

- **President** – Provides strategic leadership and through the Office of The Provost ensures DE priorities are incorporated into operational and academic plans, and communicates with the Board of Trustees on academic affairs
- **Provost and Academic Affairs** – Oversees academic quality, curriculum approval, faculty appointment, and accreditation compliance for DE.
- **General Counsel** – Provides legal advice and guidance on the compliance of DE programs with applicable federal, state, and local requirements.
- **Faculty Governance Bodies** – The Committee on Academic Standards, of the Faculty Senate, School curriculum committees, academic councils, and program directors review, approve, and evaluate DE courses and programs.
- **E-learning** – Manages instructional design, learning management systems, and faculty training in online pedagogy.

3.2 Strategic and Operational Planning

Distance education planning is embedded within GGU's institutional planning and resource allocation processes:





- DE objectives are incorporated into the University's multi-year academic and technology plans.
- Budgets include dedicated funding for technology, faculty development, instructional design, and online student services.
- Data on student outcomes, course completion rates, and engagement are used to inform future planning.

3.3 Oversight and Accountability

GGU maintains robust oversight mechanisms for DE:

- Annual reviews of program effectiveness and during accreditation review cycles or regulatory authorization and audit cycles, compliance with accreditation and regulatory requirements.
- Continuous monitoring of student achievement and satisfaction data.
- Faculty evaluation processes include review of DE course delivery and instructional effectiveness.

3.4 Reporting and Documentation

To maintain transparency and institutional accountability:

- The Office of Institutional Reporting and Effectiveness prepares reports summarizing enrollment trends, program reviews, compliance status, and planned improvements on an on-demand basis
- Reports are submitted to the relevant stakeholders including members of the Office of The Provost, deans and/or executive directors of the colleges, and program directors; they are also made available to accrediting agencies as required.
- Significant findings from DE evaluations are shared with faculty governance bodies to inform curriculum and instructional planning.

4. Curriculum and Instructional Design Standards

Golden Gate University (GGU) ensures that all distance education (DE) curricula meet the same academic quality, rigor, and learning outcome expectations as courses and programs offered in traditional formats. Curriculum development and instructional design for DE are faculty-led, supported by instructional designers and guided by best practices to promote effective learning, engagement, and accessibility.

4.1 Academic Quality and Rigor





- DE courses must reflect the approved **Program Learning Outcomes (PLOs)** and **Course Learning Outcomes (CLOs)** identical to those in on-campus sections.
- Credit hours, workload expectations, and assessment methods must meet federal definitions and institutional policy.
- Faculty are responsible for maintaining academic integrity and ensuring that all course content meets GGU's standards for scholarly and professional quality.

4.2 Curriculum Development and Approval

- New DE courses and programs follow the same review and approval process as traditional offerings, including faculty governance and Academic Affairs oversight.
- Curriculum proposals must demonstrate alignment with the program's mission, learning outcomes, and accreditation requirements.
- All DE courses must include measurable learning outcomes and clear assessment strategies.

4.3 Instructional Design Standards

- Course design done and as monitored by eLearning must follow GGU's, incorporates best practices in online pedagogy, accessibility, and usability.
- Instruction must provide **regular and substantive interaction (RSI)** between students and instructors, in compliance with federal regulations.
- Instructional materials should support varied learning styles and be compatible with assistive technologies to ensure compliance with the Americans with Disabilities Act (ADA) and Section 508.

4.4 Curriculum Currency and Relevance

To ensure ongoing effectiveness and responsiveness to student and industry needs:

- DE courses are reviewed by the Committee for Academic Standards (CAS), or as required by changes in accreditation standards or professional practice.
- Faculty and program chairs are responsible for updating course materials, readings, and technology integrations to reflect current knowledge and skills.
- Curriculum changes must be documented and approved through established faculty governance processes.





5. Faculty Qualifications, Training, and Evaluation

Golden Gate University (GGU) requires that faculty teaching in distance education (DE) programs meet the same academic and professional qualifications as those teaching in traditional, on-campus formats. Faculty are central to maintaining the academic integrity, rigor, and effectiveness of DE, and are provided with targeted training, support, and evaluation to ensure high-quality online instruction.

5.1 Faculty Qualifications

- Faculty must possess academic credentials and professional expertise consistent with GGU's Faculty Policy Manual requirements and accreditation standards.
- In professional and practice-based programs, faculty may also be appointed based on substantial industry experience in the discipline taught.
- All faculty must demonstrate the ability to teach effectively in the online environment, including competence in relevant technologies.

5.2 Initial Training and Certification

- New faculty must complete training that is offered by the eLearning team and which is done at the New Faculty Orientation at the beginning of each semesters. New adjuncts as well current faculty are invited to attend.
- Training includes instruction in:
 - Learning management system (E-learning) navigation and tools.
 - Online pedagogy and engagement strategies.
 - Compliance with **Regular and Substantive Interaction (RSI)** requirements.
 - Accessibility standards (ADA/Section 508).
- Faculty transferring from other institutions must demonstrate equivalent online teaching preparation or complete GGU's training before course assignment.

5.3 Ongoing Professional Development

- Faculty are encouraged and, in some cases, required to participate in workshops, webinars, and peer-learning sessions focused on innovations in online teaching.
- Annual opportunities for instructional design consultations are provided to update course materials, integrate new technology, and enhance student engagement.
- GGU supports faculty attendance at conferences and professional meetings relevant to online education.





5.4 Evaluation of Online Teaching

- Faculty performance in DE courses is evaluated through:
 - **Student evaluations of instruction** for online-specific teaching effectiveness.
 - **Peer review of course design and delivery** done by the request of program directors and members of E-learning
 - **Program Director or Department Chair evaluations**, including review of E-learning analytics, student feedback, and assessment results.
- Faculty not meeting minimum standards are provided with a remediation plan, mentoring, and follow-up reviews.

5.5 Ongoing Faculty Development Commitment

To ensure sustained instructional excellence:

- All DE faculty are encouraged to participate in at least one approved online teaching enhancement activity per academic year.
- The Provost's Office maintains records of faculty training and development to ensure compliance and track professional growth.
- Faculty development needs identified through evaluations are prioritized for future training initiatives.

6. Student Support and Academic Services

Golden Gate University (GGU) ensures that students enrolled in distance education (DE) programs have access to the full range of academic and support services necessary to promote persistence, learning, and degree completion. These services are equivalent in quality, scope, and availability to those provided to on-campus students, with adaptations to ensure accessibility in the online environment.

6.1 Academic Support Services

- **Advising and Academic Planning** – Online students receive individualized academic advising via video conferencing, phone, and email through the Office of Student Advising.
- **Library and Research Resources** – Full access to the GGU Library's electronic databases, e-books, journals, and research guides is available remotely, with librarian assistance via live chat and scheduled consultations.





- **Tutoring and Learning Support** – Virtual tutoring, writing assistance, and quantitative skills support are provided through the Division of Student Services.
- **Career Services** – Online career counseling, resume reviews, job search resources, and employer networking opportunities are accessible through the Career Center.

6.2 Student Services and Engagement

- **Orientation** – All DE students participate in an online orientation program covering academic expectations, technology requirements, and available resources.
- **Technical Support** – Help desk assistance is available for E-learning issues, email access, and other technology-related concerns.
- **Student Life** – DE students are encouraged to participate in virtual events, webinars, and student organizations to foster community engagement.

6.3 Accessibility and Compliance

GGU complies in accordance with ADA Section 504 of the Rehabilitation Act, and Section 508 accessibility standards requirements, ensuring that online course content, instructional materials, and learning technologies provide equitable access for students with disabilities.

- Faculty and instructional staff are responsible for incorporating accessible design practices, including captioning, alternative text, transcripts, and accessible document formats.
- The Office of Accessibility Education coordinates reasonable accommodations and collaborates with faculty and staff to support students with documented disabilities.
- For programs delivered in partnership with third-party or international providers, GGU maintains oversight of accessibility expectations consistent with U.S. ADA principles and works with partners to address identified accessibility barriers.

The above ensures that:

- All online services comply with ADA and Section 508 accessibility requirements.
- Closed-captioning, screen-reader compatibility, and alternative formats for learning materials are provided as needed.
- GGU ensures online services meet applicable federal and state regulations, including FERPA privacy protections.

6.4 Monitoring and Continuous Improvement

- Student support services for DE are assessed annually through surveys, usage data, and student feedback.





- Results inform service enhancements, staffing adjustments, and resource allocation decisions.
- Academic and student affairs collaborate to ensure services remain relevant to evolving online student needs.

6.5 Online Student Experience Standards

To promote a high-quality and consistent student experience,

- All DE students must have seamless access to academic, administrative, and technical support via the GGU portal. GGU specifically requires or strongly advises students to have the following:
 - Connection Speed: A broadband (DSL, LAN, cable) connection is required.
 - Connecting to the internet with ethernet cable is strongly recommended when students take quizzes and exams to prevent dropped Wifi connections that may affect exam taking.
 - Browsers: Students are advised that Chrome and Firefox give the best experience.
 - Students are also advised that not all online course material will work well on a tablet or smartphone and that they will need access to a desktop or laptop.
 - Webcams: Certain courses, and even some assignments, may require an inexpensive webcam. Webcams are also required for ProctorU exams.
- All DE students must have seamless access to academic, administrative, and technical support via the GGU portal.
- Response time for student inquiries in DE courses and services is generally targeted at **48 hours or less** during the academic term.
- Feedback from online students is systematically reviewed to improve services, and recurring issues are addressed through targeted interventions.

7. Technology Infrastructure, Access, and Support

Golden Gate University (GGU) maintains robust, secure, and scalable technology infrastructure to support all aspects of distance education (DE) delivery. The University ensures that students, faculty, and staff have reliable access to the technology, platforms, and support needed for high-quality online learning experiences.





7.1 Learning Management System (E-learning)

- GGU's official LMS platform, **E-learning** serves as the central platform for course delivery, interaction, and assessment in DE programs.
- The GGU LMS and GGU's Learning Partners' LMSs must meet institutional standards for usability, accessibility, and compliance with **Regular and Substantive Interaction (RSI)** requirements.
- Course shells are pre-configured with standardized templates to ensure consistent navigation and presentation.

7.2 Technology Standards and Requirements

- Minimum hardware, software, and internet connectivity requirements are published on GGU's website for all DE students and faculty.
- Technology standards are reviewed annually to ensure compatibility with the LMS, integrated tools, and emerging instructional technologies.
- Specialized programs may require additional technology or software licenses, which are communicated during the admissions or enrollment process.

7.3 Access and User Authentication

- Secure, unique login credentials are required for all users accessing GGU's online systems.
- Authentication protocols comply with federal and state regulations, including FERPA, to protect student privacy and academic records.
- Systems use encryption and multi-factor authentication for sensitive transactions, such as assessments or personal data updates.

7.4 Technical Support Services

- **Help Desk Support** – Provides support for E-learning access, GGU email, and integrated instructional tools.
- **Tiered Support Model** – Complex technical issues are escalated to IT specialists or vendor partners for timely resolution.
- Training resources, including video tutorials and user guides, are available within the E-learning and GGU portal.

7.5 System Reliability and Continuity

To ensure uninterrupted DE delivery:

- E-learning and core online services must maintain **99.5% or higher uptime** annually, excluding scheduled maintenance.





- GGU maintains disaster recovery and business continuity plans, including secure data backup and redundancy protocols.
- Technology infrastructure performance is monitored continuously, with proactive maintenance and security updates applied on a scheduled basis.

8. Accessibility, Equity, and Compliance

Golden Gate University (GGU) is committed to ensuring that all distance education (DE) programs are accessible, equitable, and compliant with applicable federal, state, and accreditation requirements. The University upholds these standards to foster an inclusive learning environment where every student has the opportunity to succeed.

8.1 Accessibility Standards

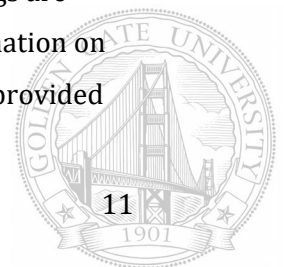
- All online course content, materials, and learning tools of GGU controlled LMS must comply with the **US Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and Section 508 accessibility requirements.**
- Faculty and instructional designers are responsible for ensuring that all instructional media include alternative text, closed captions, transcripts, and other accessibility features as appropriate.
- The Office of Accessible Education provides accommodations in collaboration with faculty and staff to support students with documented disabilities.

8.2 Equity in Course Design and Delivery

- DE courses must be designed to accommodate diverse learning preferences and needs.
- Examples, case studies, and course content should reflect diverse perspectives and cultures to promote inclusivity.
- Assessment methods must allow for equitable demonstration of learning, including alternatives for students who require accommodations.

8.3 Compliance with Legal and Regulatory Requirements

- All DE operations comply with the **Family Educational Rights and Privacy Act (FERPA)** to protect student privacy.
- GGU adheres to state authorization regulations and ensures all DE offerings are approved for delivery in jurisdictions where students are enrolled. Information on jurisdiction for authorization and also licensure permissions for states is provided





and is updated in our catalog on a yearly basis or when the state notifies GGU of any changes. Enrollment agreements are also updated and are required to be reviewed accordingly. Information on authorizations is contained in our catalog.

<https://catalog.ggu.edu/content.php?catoid=18&navoid=1081#state-authorizations>

- Additionally, GGU provides complaint procedures that follow both state specific (where and as specified by the state regulator) and also in accordance Bureau for Private Post-Secondary policies for the State of California from which Golden Gate University operates in addition to WSCUC required procedures. Information on complaint procedures is contained in our catalog.
<https://catalog.ggu.edu/content.php?catoid=18&navoid=1092&hl=complaint&returnto=search>
- Programs must meet or exceed the standards of the **Western Association of Schools and Colleges Senior College and University Commission (WSCUC)** and other relevant professional accrediting bodies.

8.4 Equity in Access to Online Learning

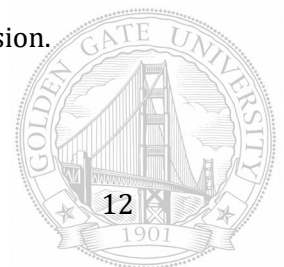
To ensure that all students can fully participate in DE programs:

- GGU provides clear guidelines and expectations on accessibility of use. See sections 6.3 and 6.5 of this document.
- Financial aid counseling is available for students needing assistance with technology-related expenses.
- Student feedback on accessibility and equity is collected annually and used to guide improvements in services, instructional design, and technology access.

9. Assessment of Student Learning and Institutional Effectiveness

Golden Gate University (GGU) applies a systematic, evidence-based approach to assessing student learning outcomes and evaluating the overall effectiveness of its distance education (DE) programs. These processes ensure that DE offerings meet institutional standards of academic rigor, contribute to student success, and align with the University's mission.

9.1 Assessment of Student Learning





- **Learning Outcomes** – Each DE course and program must have clearly defined and measurable learning outcomes equivalent to those of on-campus offerings.
- **Embedded Assessment** – Assignments, projects, exams, and discussions are designed to measure mastery of stated outcomes throughout the program.
- **Comparability** – Student achievement in DE programs is evaluated against that of comparable face-to-face programs to ensure consistency in academic quality.

9.2 Program Review and Effectiveness Measures

DE programs undergo scheduled program reviews on a six-year cycle and as required by accrediting agencies other than WASC.

- **Reviews include analysis of:**
 - All learning assessment results produced in interim years
 - Student demographics to identify enrollment and retention trends
 - Student retention, persistence, and graduation rates.
 - Employment outcomes for professional and career-oriented programs.
 - Results of student satisfaction and engagement surveys
 - Course evaluation results
 - Sufficiency of student support services
- Programs report to the Committee on Academic Standards (CAS) on actions taken on learning assessment and program review findings.
- Data is disaggregated by delivery mode to identify trends and inform targeted improvements.

9.3 Institutional Effectiveness in Distance Education

- The Provost's Office, in collaboration with Institutional Research, monitors the effectiveness of DE as part of the University's overall institutional effectiveness framework.
- Effectiveness measures include enrollment trends, student demographics, course completion rates, and faculty engagement.
- Reports are shared with faculty governance, academic leadership, and the Board of Trustees for decision-making.

9.4 Continuous Quality Enhancement

To sustain and improve the quality of DE programs:

- Findings from assessment activities are used to revise curriculum, improve instructional strategies, and enhance student support services.





- Faculty are engaged in interpreting assessment data and implementing changes to improve learning outcomes.
- Annual action plans for DE quality enhancement are developed and tracked for implementation progress.

10. Academic Integrity and Student Authentication

Golden Gate University (GGU) upholds the highest standards of academic integrity in all distance education (DE) programs. The University maintains clear policies, procedures, and technological safeguards to ensure that the work submitted by students represents their own learning and that student identities are verified in compliance with federal, state, and accreditation requirements.

10.1 Academic Integrity Standards

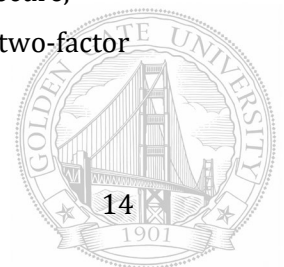
- All DE students are subject to the **GGU Academic Integrity Policy** as outlined in the Student Handbook and Faculty Policy Manual.
- Academic dishonesty includes, but is not limited to, plagiarism, cheating, fabrication, unauthorized use of AI and/or failure to cite its use, unauthorized collaboration, and facilitation of misconduct. See also <https://catalog.ggu.edu/content.php?catoid=18&navoid=1094&hl=academic+misconduct&returnto=search>
- Faculty are responsible for clearly communicating expectations for academic honesty in course syllabi and within the learning management system (E-learning).

10.2 Prevention and Detection Measures

- Courses incorporate plagiarism detection software (e.g., Turnitin or equivalent) for written assignments.
- Online assessments are designed to minimize opportunities for dishonesty through question banks, randomization, time limits, and varied assessment types.
- Faculty receive training in detecting and addressing academic misconduct in the online environment.

10.3 Student Authentication Requirements

- GGU verifies the identity of students enrolled in DE programs by issuing secure, unique login credentials for e-learning and other academic systems using two-factor authentication.





- Authentication complies with the U.S. Department of Education's requirements for student verification in DE, including secure login and password protocols.
- For high-stakes assessments, additional measures such as proctored exams, multi-factor authentication, or biometric verification may be required.

10.4 Addressing Academic Misconduct

- Suspected violations are investigated according to the procedures outlined in GGU's Academic Integrity Policy. See:
<https://catalog.ggu.edu/content.php?catoid=18&navoid=1094&hl=academic+misco&returnto=search#academic-integrity-policy>
- Sanctions may include warnings, grade penalties, course failure, suspension, or dismissal, depending on the severity of the offense.
- Students have the right to due process and to appeal disciplinary decisions through established University channels.

10.5 Authentication Technology Enhancements

To ensure ongoing security and trust in DE programs:

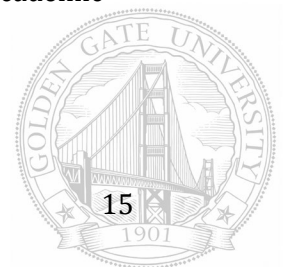
- The University periodically evaluates new authentication technologies, such as AI-assisted proctoring, identity verification apps, and keystroke biometrics.
- Pilot programs for emerging tools are conducted prior to full-scale adoption to assess impact on student privacy, accessibility, and effectiveness.
- Upgrades to authentication protocols are communicated to all stakeholders before implementation.

11. Distance Education Course Approval Process

Golden Gate University (GGU) ensures that all distance education (DE) courses are developed, reviewed, and approved through a formal process that maintains academic quality, regulatory compliance, and alignment with the University's mission and strategic goals.

11.1 Approval Authority and Governance

- The creation or significant revision of a DE course requires approval from the **academic department**, the **Curriculum Committee**, the Committee on Academic Standards of the Faculty Senate, and the **Provost's Office**.





- All approvals are documented and retained in accordance with the University's academic governance policies. The University uses an electronic database to manage and communicate curricular and policy changes.
- Courses that are part of a program subject to external accreditation must also comply with the accrediting body's course approval requirements.

11.2 Proposal Requirements

A DE course proposal must include:

- Course title, description, and learning outcomes.
- Alignment with program learning objectives and institutional mission.
- Proposed instructional methods and technologies to be used.
- Assessment strategies for measuring student learning.
- Statement of compliance with **Regular and Substantive Interaction (RSI)** requirements.

11.3 Instructional Design and Review

- Faculty collaborate with instructional designers from E-learning to ensure that the course meets GGU design and course delivery guidelines
- Courses are reviewed for:
 - Academic rigor and equivalency to on-campus offerings.
 - Clarity of navigation and ease of use within E-learning.
 - Inclusion of engaging and interactive learning activities.
- Accessibility and copyright compliance are verified before final approval.

11.4 Pilot Testing and Feedback

- New DE courses may undergo a pilot offering with limited enrollment to gather feedback on design, delivery, and student experience.
- Faculty and instructional designers use pilot feedback to make improvements before full rollout.

11.5 Expedited Approval for Innovative Offerings

In cases where emerging technologies, urgent workforce needs, or special partnerships necessitate rapid deployment:

- The Provost may authorize an expedited review and approval process by the Committee on Academic Standards (CAS) while ensuring all quality and compliance standards are met.





- Expedited approvals are time-limited and subject to a formal review after the first offering to determine continued approval.

12. Regular and Substantive Interaction (RSI)

Requirements,

Golden Gate University (GGU) is committed to delivering high-quality distance education (DE) programs that meet federal requirements for **Regular and Substantive Interaction (RSI)** between students and instructors. These standards ensure that online courses provide meaningful academic engagement equivalent to in-person instruction.

12.1 Definition and Compliance

In alignment with U.S. Department of Education regulations, RSI in DE courses must:

- Be initiated by the instructor, not solely student-driven.
- Be scheduled and predictable, occurring throughout the course.
- Be academic in nature and directly related to the course content.
- Involve instructors who meet GGU's faculty qualification standards.

12.2 Qualifying Types of Interaction

Examples of substantive interaction include:

- Providing direct instruction via synchronous or asynchronous methods.
- Assessing or providing feedback on student assignments, projects, or exams.
- Responding to questions about course content within established response time guidelines.
- Facilitating group discussions or collaborative learning activities.
- Offering academic guidance or mentoring related to the course or program.

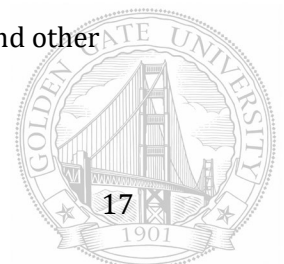
12.3 Non-Qualifying Interactions

The following activities alone do not meet RSI requirements:

- Automated feedback without instructor review.
- Posting generic announcements without individualized engagement.
- Passive grading without substantive comments or instructional input.

12.4 Instructor Responsibilities

- Instructors must maintain an active teaching presence in the E-learning and other course platforms.





- Faculty are to respond to student inquiries generally within **48 hours** during the work week (excluding weekends and holidays).
- Interaction patterns should be documented in the course syllabus and consistent with program expectations.

12.5 Monitoring and Documentation

- E-learning monitors RSI compliance through course audits, faculty self-reports, and student feedback.
- Non-compliance may result in faculty development interventions or adjustments to course delivery.

12.6 Commitment to Learning Engagement

To maintain academic quality and compliance:

- All DE courses are designed with built-in RSI activities and checkpoints.
- Faculty receive training on RSI strategies, tools, and documentation requirements.
- Continuous improvement efforts include integrating emerging technologies that enhance instructor-student engagement.

13. Intellectual Property, Copyright, and TEACH Act Compliance

Golden Gate University (GGU) is committed to protecting intellectual property rights and ensuring that all distance education (DE) materials are developed, used, and distributed in compliance with U.S. copyright laws, the Technology, Education, and Copyright Harmonization (TEACH) Act, and applicable University policies.

13.1 Intellectual Property Ownership

- Ownership of course content developed for DE is governed by GGU's Intellectual Property Policy as outlined in the Faculty Policy Manual and Employee Handbook.
- Materials created by faculty in the normal course of teaching generally remain the property of the faculty member, except when:
 - Developed as part of a sponsored project or grant.
 - Created with substantial University resources or external funding.
 - Produced under a contractual agreement that otherwise defines ownership rights.





- In cases of institutional ownership, GGU retains rights for ongoing use, modification, and delivery.

13.2 Copyright Compliance

- Faculty are responsible for ensuring that all instructional materials used in DE courses comply with U.S. copyright laws.
- Materials should be sourced from:
 - Works in the public domain.
 - Licensed resources through GGU's library subscriptions.
 - Materials used under a Creative Commons or equivalent open license.
- Use of copyrighted works without explicit permission must meet the criteria for **fair use** under U.S. copyright law.

13.3 TEACH Act Provisions for Distance Education

Under the TEACH Act, GGU faculty may use copyrighted materials in DE courses without obtaining prior permission if:

- Access to materials is limited to enrolled students.
- Materials are directly related to the course and integral to instructional activities.
- Reasonable measures are taken to prevent unauthorized distribution (e.g., disabling downloads, streaming content).
- Only the amount necessary for instructional purposes is used.

13.4 Licensing and Permissions

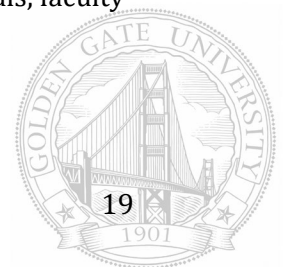
- When fair use or TEACH Act provisions do not apply, faculty must obtain permission from the copyright holder before using materials.
- The University's Library and E-learning provide guidance and assistance in securing necessary licenses.

13.5 Training and Faculty Support

- GGU offers periodic workshops and resources on copyright compliance, intellectual property rights, and TEACH Act requirements.
- Faculty developing DE courses are encouraged to consult with the Library and instructional designers during course creation to ensure compliance.

13.6 Enforcement and Accountability

- Violations of copyright law or GGU policy may result in removal of materials, faculty retraining, or disciplinary action.





- Students are also bound by GGU's Academic Integrity Policy regarding the use and distribution of course materials.

14. Faculty Workload, Compensation, and Scheduling

Golden Gate University (GGU) recognizes the importance of establishing equitable, transparent, and clearly defined policies for faculty workload, compensation, and scheduling in distance education (DE) programs. These policies ensure instructional quality, faculty satisfaction, and operational efficiency while maintaining alignment with University standards and accreditation requirements.

14.1 Workload Determination

- DE teaching assignments are governed by the same academic standards as face-to-face courses, with workload calculations reflecting credit hours, contact time, and student enrollment.
- In determining workload, the following factors are considered:
 - Time spent on course design, preparation, and e-learning setup.
 - Ongoing instructional activities, including grading, feedback, and student communications.
 - Regular and Substantive Interaction (RSI) requirements as mandated by federal guidelines.
- Faculty assigned to develop new DE courses receive workload credit or a development stipend as approved by the Provost's Office.

14.2 Compensation Guidelines

- Compensation for teaching DE courses follows the University's established faculty pay scale, with parity to equivalent in-person courses.
- Additional compensation may be provided for:
 - Developing new online courses or significantly revising existing ones.
 - Serving as a mentor to other online faculty.
 - Participating in special DE initiatives or pilot programs requiring extra commitment.
- Compensation practices and payment schedules for DE faculty adhere to state, federal, and University payroll policies.





14.3 Scheduling of DE Courses

- DE courses are scheduled in alignment with the University's academic calendar and term structures.
- Departments ensure a balanced offering of DE courses to meet program requirements, student demand, and faculty availability.
- Faculty availability, expertise, and past performance in DE instruction are considered when making teaching assignments.

14.4 Enrollment Management

- Minimum and maximum enrollment caps for DE courses are determined by the department in consultation with academic leadership to ensure optimal class size for effective learning.
- Low-enrollment courses may be canceled or combined with other sections, with faculty notification provided as early as possible.

14.5 Faculty Responsibilities in DE Scheduling

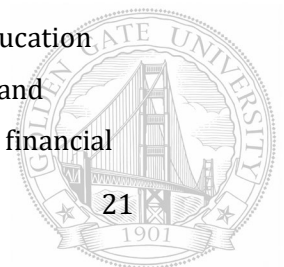
- Faculty must confirm their teaching availability during scheduling periods and adhere to agreed-upon assignments.
- Any changes in availability must be communicated promptly to department chairs or program directors.
- Faculty teaching multiple DE courses are expected to maintain a balanced workload that allows for high-quality instruction in each course.

14.6 Periodic Review of Workload and Compensation Policies

- The Provost's Office along with leaders of the academic units reviews DE workload and compensation policies periodically to ensure alignment with industry standards, faculty feedback, and evolving instructional models.
- Revisions are communicated to all faculty and integrated into University policy manuals.

15. Attendance, Participation, and Last Date of Attendance (LDA)

Golden Gate University (GGU) defines attendance and participation in distance education (DE) courses in accordance with federal regulations, accreditation requirements, and University academic policies. Clear attendance standards ensure compliance with financial





aid eligibility rules, accurate academic records, and the promotion of active student engagement.

15.1 Definition of Attendance in DE

For DE courses, **attendance** is not solely based on logging into the Learning Management System (E-learning). Instead, attendance is documented through **academic engagement activities**, which may include:

- Submitting assignments or assessments.
- Posting in graded discussion forums.
- Participating in synchronous class meetings.
- Completing quizzes or exams.
- Engaging in instructor-initiated communications regarding course content.

15.2 Participation Requirements

- Faculty must clearly state participation expectations in the syllabus, including frequency and type of required activities.
- Students are expected to engage regularly in course activities to maintain satisfactory academic progress.
- Instructors monitor student engagement through the e-Learning and other instructional platforms to ensure compliance with participation requirements.

15.3 Last Date of Attendance (LDA)

The **Last Date of Attendance (LDA)** is the last documented date on which a student actively participated in an academically related activity.

- LDA is used for:
 - Determining federal financial aid return calculations (R2T4).
 - Accurately recording withdrawals and drop dates.
 - Assessing student eligibility for refunds.
- Examples of documented LDA include:
 - Submission of coursework or exams.
 - Attendance at a virtual class meeting.
 - Submission of substantive contributions to group projects or discussions.

Further specification on attendance requirements, policies and definitions can be found via the following link for GGU:

<https://catalog.ggu.edu/content.php?catoid=18&navoid=1094&hl=academic+misconduct&returnto=search#attendance-requirements>





15.4 Faculty Responsibilities

- Faculty are responsible for:
 - Documenting attendance and participation in compliance with University policy.
 - Entering LDA in the student information system for withdrawn or dropped students.
 - Reporting students who fail to engage during the first week of class to the Registrar for non-attendance processing.

15.5 Student Responsibilities

- Students must actively participate in their DE courses from the start date to avoid being dropped for non-attendance.
- Students who anticipate absences or reduced participation must communicate proactively with their instructors.

15.6 Compliance and Recordkeeping

- Accurate attendance and LDA records are reviewed and reported at the start and at end of each semester by the instructors in each course. Any deviations in expected attendance are immediately reported to the administration and program director.
- The Office of the Registrar periodically audits LDA records for accuracy and compliance.

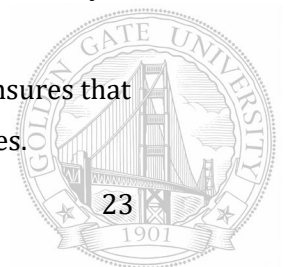
16. Library and Learning Resources for Distance

Learners

Golden Gate University (GGU) is committed to ensuring that students enrolled in distance education (DE) courses and programs have equitable access to high-quality library services and learning resources equivalent to those available to on-campus students. These resources are critical to supporting academic success, fostering information literacy, and maintaining the integrity of the University's curriculum.

16.1 Access to Library Resources

- DE students have 24/7 remote access to GGU's library catalog, electronic databases, e-books, e-journals, research guides, and multimedia collections via the University's online library portal.
- Two-factor authentication through the University's secure login system ensures that only enrolled students and authorized faculty can access licensed resources.





16.2 Research Support Services

- Professional librarians provide reference and research assistance to DE students via email, live chat, phone, and video conferencing.
- One-on-one virtual consultations are available for in-depth research support, including guidance on topic selection, database navigation, and citation formatting.
- Subject-specific research guides and tutorials are available online to support independent learning.

16.3 Information Literacy Instruction

- Information literacy instruction is integrated into DE courses through embedded library modules, tailored research assignments, and recorded webinars.
- Faculty are encouraged to collaborate with librarians to design assignments that develop students' ability to locate, evaluate, and ethically use information.

16.4 Additional Learning Resources

- DE students have access to online tutoring services, writing assistance, and academic skills workshops through the University's Academic Success Center.
- Multimedia learning objects, including instructional videos, interactive exercises, and self-paced modules, are available to reinforce course content.

16.5 Accessibility and Inclusivity

- All digital resources are reviewed to ensure compliance with accessibility standards (ADA and Section 508) so that they can be used by students with disabilities.
- Alternative formats for course and library materials are provided upon request through the Accessibility Services Office.

16.6 Faculty Support and Integration

- Faculty teaching DE courses receive training on integrating library and learning resources into the LMS.
- Librarians participate in course development to ensure that appropriate, current, and diverse resources are embedded into the curriculum.

16.7 Continuous Evaluation of Resources

- The Library, in collaboration with academic departments and E-learning, conducts periodic reviews of DE resource usage, accessibility, and relevance.
- Feedback from DE students and faculty is used to enhance library collections and services.





17. Privacy, FERPA, and Data Security in Distance Education

Golden Gate University (GGU) is committed to protecting the privacy and security of all student, faculty, and institutional data in compliance with the **Family Educational Rights and Privacy Act (FERPA)**, applicable state laws, and University policies. Distance education (DE) environments must meet the same legal and ethical standards as in-person instruction, with additional safeguards for online delivery.

17.1 FERPA Compliance

- Student education records in DE programs are subject to FERPA.
- Access to a student's education records is granted only when the student provides consent or when a FERPA exemption applies. See GGU's FERPA guidance: <https://ggu.edu/academic-records-confidentiality/>
- Faculty and staff must refrain from publicly posting grades, personally identifiable information (PII), or feedback in a manner that could reveal student identities without consent.

17.2 Student Privacy in Online Learning Environments

- DE courses must be delivered through secure, University-approved platforms (e.g., E-learning, video conferencing tools). Access to E-learning is provided through the MyGGU portal which requires authentication.
- Live class recordings, if used, must be stored securely and accessible only to enrolled students and authorized faculty.
- Faculty must obtain consent before sharing student work, images, or recordings outside the course environment.

17.3 Data Security Standards

- All DE platforms and systems must use encryption protocols for the transmission of sensitive data.
- University-issued accounts, devices, and software must comply with GGU's Information Security Policy.
- Faculty and staff must use secure passwords, enable multi-factor authentication, and complete periodic cybersecurity training.

17.4 Third-Party Vendors and Tools





- Any third-party educational technology integrated into DE courses must undergo a privacy and security review by GGU's IT and legal teams.
- Vendor agreements must include provisions for FERPA compliance, data protection, and breach notification.

17.5 Data Retention and Disposal

- Student data in DE systems is retained in accordance with GGU's Records Retention Policy and applicable regulations. See also:
<https://catalog.ggu.edu/content.php?catoid=18&navoid=1107&hl=record+retention&returnto=search>
- Data that is no longer required must be securely deleted or destroyed.

17.6 Breach Response Protocol

- In the event of a suspected or confirmed data breach involving DE systems, the University's Incident Response Plan must be immediately enacted.
- Affected individuals will be notified in compliance with applicable laws and University policy.

17.7 Training and Awareness

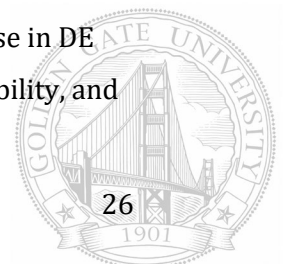
- Faculty, staff, and students engaged in DE are provided with training on FERPA rights, privacy best practices, and secure use of online learning platforms.
- Regular reminders and updated resources are distributed to reinforce data protection responsibilities.

18. Professional Development for Distance Education Faculty

Golden Gate University (GGU) recognizes that ongoing professional development is essential for faculty excellence in distance education (DE). Faculty who teach or develop online and hybrid courses are expected to maintain current knowledge of instructional best practices, educational technologies, regulatory compliance requirements, and emerging trends in online pedagogy.

18.1 Commitment to Faculty Growth

- GGU provides structured opportunities for faculty to expand their expertise in DE delivery, including training in course design, student engagement, accessibility, and assessment strategies.





- Professional development is aligned with GGU's academic standards, strategic goals, and student success priorities.

18.2 Required Training for DE Faculty

- Faculty new to teaching DE must complete an approved orientation program covering:
 - Learning Management System (E-learning) functionality.
 - Regular and Substantive Interaction (RSI) standards.
 - Accessibility and universal design principles.
 - FERPA and data security requirements.
- Completion of required training is documented in faculty personnel records.

18.3 Ongoing Development Opportunities

- Faculty are encouraged to participate in:
 - Webinars, workshops, and conferences focused on online learning.
 - Peer mentoring programs and faculty learning communities.
 - Course design and redesign institutes hosted by E-learning.
- Stipends or professional development credits may be provided for participation in approved activities.

18.4 Evaluation and Feedback for Growth

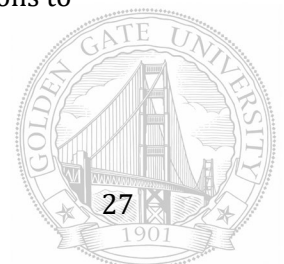
- Faculty receive periodic evaluations of their DE teaching, which may include peer reviews, student feedback, and course analytics.
- Evaluation results inform individualized professional development plans to strengthen instructional practices.

18.5 Support Resources

- Instructional designers, librarians, and technology specialists are available to assist faculty in integrating innovative tools and approaches into DE courses.
- The University maintains a repository of teaching guides, templates, and sample modules accessible to all DE instructors.

18.6 Encouragement of Scholarly Engagement

- Faculty are encouraged to engage in research and scholarship on online learning and share findings with the GGU academic community.
- The University supports faculty in submitting presentations and publications to professional conferences and journals related to DE.





19. Continuous Improvement and Program Review

Golden Gate University (GGU) is committed to maintaining the quality, relevance, and effectiveness of its distance education (DE) offerings through a structured process of continuous improvement and systematic program review. This process ensures that DE programs meet institutional goals, accreditation standards, and the evolving needs of students and employers.

19.1 Purpose of Continuous Improvement

- To ensure that DE programs remain aligned with GGU's mission and academic standards.
- To monitor and enhance achievement of student learning outcomes, retention, and student satisfaction.
- To identify emerging trends and integrate best practices in online pedagogy and technology.

19.2 Program Review Cycle

- DE programs undergo formal review at least once every six years or on a schedule consistent with University program review policy.
- Interim assessments may be conducted annually to address urgent needs, regulatory changes, or significant shifts in enrollment patterns.

19.3 Review Criteria

Program reviews evaluate:

- Student learning outcomes achievement and assessment results.
- Curriculum relevance and alignment with industry and accreditation standards.
- Faculty qualifications, engagement, and professional development participation.
- Student satisfaction survey data and feedback from advisory boards.
- Retention, graduation, and job placement rates for DE students.
- Adequacy of technology infrastructure, library resources, and academic support.

19.4 Data Collection and Analysis

- Data is collected from multiple sources, including E-learning analytics, institutional research reports, faculty evaluations, and student surveys.
- Vice Provost for Institutional Effectiveness and Reporting, the Director of Assessment, and E-learning, in collaboration with academic departments, analyzes results to identify strengths, weaknesses, and opportunities for enhancement.





19.5 Action Planning and Implementation

- Review findings are documented in a formal report and presented to the Provost's Office and relevant academic committees.
- Action plans include measurable goals, responsible parties, timelines, and resource needs.
- Implementation progress is monitored and reported annually.

19.6 Stakeholder Involvement

- Faculty, students, staff, alumni, and industry partners may be invited to provide input during program review.
- Recommendations are reviewed by the Faculty Senate or other governance bodies as appropriate.

19.7 Continuous Feedback Loops

- Student and faculty feedback is solicited regularly through surveys, focus groups, and informal consultations.
- Technology tools and pedagogical strategies are updated in response to feedback and performance metrics.

20. Glossary of Terms

The following terms are defined for the purpose of this Distance Education (DE) Policy Manual to ensure clarity and consistency across all academic and administrative units.

Academic Engagement

Active participation in an academically related activity such as submitting assignments, participating in discussions, completing quizzes or exams, attending virtual class sessions, or communicating with the instructor about academic matters.

Accessibility

The design and delivery of instructional materials and technology so that they are usable by individuals with disabilities, in compliance with the Americans with Disabilities Act (ADA) and Section 508 standards.

Accreditation

Formal recognition by an external accrediting body, such as the WASC Senior College and





University Commission (WSCUC), that an institution or program meets established quality standards.

Asynchronous Learning

Instruction that does not occur in real time, allowing students to engage with course materials, assignments, and discussions at their own pace within set deadlines.

C-RAC Guidelines

The Interregional Guidelines for the Evaluation of Distance Education developed by the Council of Regional Accrediting Commissions, which outline quality standards for online learning.

Distance Education (DE)

Instruction in which students and instructors are separated by location and interact primarily through electronic means, with regular and substantive interaction (RSI) between instructor and student.

FERPA

The Family Educational Rights and Privacy Act, a federal law that protects the privacy of student education records.

Hybrid (Blended) Course

A course that combines face-to-face classroom instruction with online learning activities and resources.

Learning Management System (e-learning)

A software application used to deliver, track, and manage online courses, including assignments, discussions, grading, and course communications.

Last Date of Attendance (LDA)

The last recorded date on which a student participated in an academically related activity, used for financial aid and academic record purposes.

Online Proctoring

A method of supervising exams in a virtual environment to ensure academic integrity, typically through video monitoring, identity verification, and secure browsers.

Regular and Substantive Interaction (RSI)

Meaningful, instructor-initiated contact with students that is academic in nature and occurs on a regular basis throughout a course, as required by federal distance education regulations.





Synchronous Learning

Instruction that occurs in real time, where students and instructors meet virtually at scheduled times using Zoom or similar technologies.

Universal Design for Learning (UDL)

An educational framework for designing curriculum and learning environments to accommodate individual learning differences and promote accessibility for all students. E-learning engages in best practices in universal design for learning.

21. Forms, Checklists, and Templates are available upon request

