WHAT IS IT?
Defining Regular and Substantive Interaction

FREQUENTLY ASKED QUESTIONS
Answering commonly asked questions

WHAT ARE ITS KEY ELEMENTS?
Identifying key elements of RSI
WHAT IS REGULAR & SUBSTANTIVE INTERACTION?

In 2020, the Department of Education (DoE) released new regulatory language around distance education that went into effect on July 1, 2021. This new language includes, for the first time, clarification of regular and substantive interaction. Historically, this phrase was not well defined in the regulations.

Regular and substantive interaction is the distinguishing feature of distance education versus correspondence education. Institutions risk losing access to student financial aid if more than 50 percent of their courses are classified as correspondence courses or more than 50 percent of their students are enrolled in correspondence courses. Therefore, it is vital that Tarrant County College (TCC) ensure that its distance education courses have regular and substantive interaction as component of its online courses.

This document provides a brief overview of regular and substantive interaction, TCC’s expectations for regular and substantive interaction, and answers to several frequently asked questions. It is not meant to be a comprehensive document, however, and any additional questions should be directed to your academic administrator.

TCC'S EXPECTATIONS REGARDING RSI

- Must be with the course instructor
- Must be initiated by the instructor
- Must be scheduled and predictable
- Must be academic in nature and relevant to the course
- Must ensure that instructors are promptly and proactively engaging students in substantive interaction; and include at least three of the following:
  - direct instruction,
  - coursework assessment or feedback,
  - information about the course content,
  - group discussion of the course content, or
  - other instructional methods approved by SACSCOC.
THE REGULATORY DEFINITION
OF "DISTANCE EDUCATION,"
INCLUDING REGULAR AND
SUBSTANTIVE INTERACTION,
34 C.F.R. 600.2

The following definition took effect on July 1, 2021 for all institutions. The highlighted items (sections 4 and 5) refer specifically to regular and substantive interaction.

(1) Education that uses one or more of the technologies listed in paragraphs (2) (i) through (iv) 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.

(2) The technologies that may be used to offer distance education include-
(i) The Internet;
(ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber options, satellite, or wireless communications devices;
(iii) Audio conference; or
(iv) Other media used in a course in conjunction with any of the technologies listed in paragraph (2) (i) through (iii) of this definition.

(3) For purposes of this definition, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution’s accrediting agency.

(4) For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also include at least two of the following:
(i) Providing direct instruction;
(ii) Assessing or providing feedback on a student’s coursework;
(iii) Providing information or responding to questions about the content of a course or competency;
(iv) Facilitating a group discussion regarding the content of a course or competency; or
(v) Other instructional activities approved by the institution’s or program’s accrediting agency.

(5) An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student’s completion of a course or competency—
(i) Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
(ii) Monitoring the student’s academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.

According to the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), the accreditation body for Tarrant County College (TCC), while faculty assume primary responsibility for ensuring the rigor of programs and the quality of instruction, the institution is ultimately responsible with ensuring compliance by tracking comparability of distance and correspondence courses, establishing policies and expectations for program quality, and the evaluation of educational effectiveness of student learning outcomes and student success.
**COURSE DESIGN & DELIVERY STRATEGIES**

**DESIGN**

Course includes the tools for instructors to hold virtual office hours. NOTE: TCC Connect Campus Faculty Guide outlines the requirements regarding office hours.

Syllabus includes clear expectations for interactions, how frequently students can expect to hear from the instructor, and how quickly they can expect a response to questions and work they submit. Any synchronous meetings/requirements must be identified in the syllabus detailing the preferred method of communication. Participation expectations for students should be included as well.

Course includes easily accessible instructor contact information with instructor’s name, email, and preferred phone number.

"Ask a question" discussion forum is included in the course for students to ask questions openly about the weekly course material. This may be answered by the instructor or other students.

Course includes at least one high-engagement activity within the first two weeks of class allowing students to get to know one another and begin to build community.

Instructor-facilitated discussion forums are included throughout the course if applicable. The discussions are designed to allow for the instructor to engage with students and students to engage with each other.

Learning activities/assessments that require timely instructor feedback via detailed rubrics and written comments.

**DELIVERY**

Instructor includes the virtual office hours links and updates the syllabus to include time and days in the course schedule. Office hours are utilized to provide a forum for students to ask questions and to supplement instruction in more intentional ways.

Instructor updates the syllabus to identify preferred methods of communication, expected frequency of communication, and information about synchronous meetings if applicable.

Instructor personalizes contact information before the course is open to students.

Instructor regularly posts announcements. While announcements usually cover procedural information, they also should be used to support instruction.

Instructor posts his/her/their introduction in this high-engagement activity and actively participates in it.

Instructor regularly posts to course discussion forums to pose guiding questions related to the course subject, propose counter points of view students may not be considering, establish connections among student’s ideas, and provide encouragement.

Instructor utilizes course rubrics and gradebook written comment areas to provide timely feedback on learning activities/assessments.

Source Inspiration: Regular and Substantive Interaction | SUNY Empire State College (esc.edu)
FREQUENTLY ASKED QUESTIONS

Who counts as an instructor?
At TCC, the instructor is the official instructor of record.

Is video lecture considered direct instruction?
A real-time video lecture would count. A recorded lecture would likely not count, but, remember, "direct instruction" is only one of a set of criteria options for substantive interaction. Therefore, one could still use recorded video lectures in a course that meets the overall definition of regular and substantive interaction if combined with other interaction activities.

Do assignments/assessments created by the instructor count as direct instruction?
A faculty member providing assignments would likely be part of direct instruction. Assessments would be part of the definition of "substantive interaction" which is "assessing or providing feedback on a student’s coursework." Please remember that the creation of assignments or assessments alone is not enough to satisfy the "substantive interaction" definition. Institutions must provide at least two of the listed opportunities for interaction such as providing direct instruction, feedback on coursework, responding to course questions, facilitating course discussion, or other instructional activities recognized by SACSCOC.

What would be examples of direct instruction?
The DoE does not define "direct instruction" as it believes that such a definition is beyond its purview. We believe that "direct instruction" would likely include participating in discussions, providing deep and meaningful feedback, synchronous lectures, recorded mini-lectures, and office hour interactions with students focused on the subject of the class. To be clear, simply assigning letter or number grades does not count as direct instruction unless it is accompanied with deep and meaningful feedback.

Does asynchronous (video, prose, discussion stems, etc.) instruction count as originating from the instructor?
Yes, but asynchronous instruction alone is not enough to satisfy the "substantive interaction" definition. Instructors must also provide other opportunities for interaction such as providing feedback on coursework, facilitating a discussion about the course content, or other instructional activities recognized by SACSCOC. Additionally, there must be "predictable and scheduled" opportunities for interaction between student and the instructor(s).

In the past there has been a focus on whether the course is self-paced thus making it correspondence education. For example, a faculty person might record a series of videos for a course. If all the videos are released on the first day of class and students can view as they wish, the course is likely self-paced.

However, if the same videos are released on a schedule throughout the term AND there are accompanying opportunities for interaction as outlined above, then those same videos are no longer a part of a self-paced course.
How does regular interaction that is predictable and scheduled work in a direct-assessment model?

The very few institutions that are eligible to use the direct-assessment financial aid model are subject to those rules. Your financial aid office will know if you are a direct assessment institution. Institutions that use the much more typical credit or clock hour version of administering federal financial aid and offer competency-based education or adaptive learning have indicated that they may introduce a few regular contact points with students, such as reaching out to students at scheduled times or the creative use of office hours to comply with the definition of regular interaction.

Is the measure of faculty interaction standards based over the length of the course or based on an instructional week?

It is based over the length of the course. There is not an exact standard like “once a week.” In a course there may be sound academic reasons for not having interaction in a given week, but you should be able to show a syllabus that outlines when activities will happen that are course appropriate.

Would interactive assessments such as coding questions with feedback be considered substantive interaction?

Feedback on assessments, especially interactive assessments, would be considered a form of substantive interaction. Adding feedback to quiz questions based on a student’s answer is a good example of these types of assessments.

Would discussion posts related to a recorded video count as substantive interaction?

Yes, unless the recorded videos were part of a whole course that is self-paced. To be clear, substantive interaction occurs within the discussion responses rather than the prompt and when the instructor replies with meaningful, timely feedback.

Is the presence of interactive activities enough or do they need to be required?

According to the commentary the Department released with its final regulations, it is not necessary that students attend office hours for those hours to fulfill the regulatory requirements for “regular,” i.e. “predictable and scheduled” interaction. The Department writes, “The requirement could be met if instructors made themselves available at a specific time and through a specific modality... regardless of whether the students chose to make use of this opportunity or interact with the instructor.”

FREQUENTLY ASKED QUESTIONS CONTINUED

Does the DoE define "academic engagement"?

Elsewhere in 34 CFR 600.2, “academic engagement” is defined as the “active participation by a student in an instructional activity related to the student’s course of study.” These activities must be accreditor approved and include, but are not limited to, attending a synchronous academic activity where there is the opportunity to interact with the instructor; submitting an academic assignment; taking an assessment; participating in interactive computer-assisted instruction; participating in a study group, group project, or online discussion; or interacting with an instructor about academic matters.

CORRESPONDENCE EDUCATION VERSUS DISTANCE EDUCATION
CORRESPONDENCE EDUCATION

Education provided through one or more courses in which the institution provides instructional materials and examinations by mail or electronic transmission to students who are separated from the instructor.

1. Interaction is not regular and substantive.
2. Interaction is primarily initiated by the student.
3. Course is typically self-paced.
4. Financial aid may be provided but can be very limited.

Here’s what faculty members can do:
- Design the course from the ground up with purposeful, planned, and regular faculty interaction activities.
- Develop a communication plan to help guide and manage interactions.
- Set up or schedule regular announcements to go out automatically at strategic points.
- Identify students struggling to reach mastery through observation of discussion activity, assessment completion, or even user activity and offer additional opportunities for interaction.

DISTANCE EDUCATION

Education that delivers instruction to students who are separated from the instructor and that supports regular and substantive interaction.

1. Interaction is regular and substantive.
2. Interaction between the students and the instructor may occur synchronously or asynchronously but is initiated by the instructor.
3. Interaction uses one or more of the following technologies: the internet; one-way and two-way transmission through open broadcast; closed-circuit cable; microwave; broadband lines; fiber optics; satellite, or wireless communication devices; or audio or video conferencing.
4. Interaction must be meaningful or of an academic nature:
   - regularly scheduled synchronous activities
   - facilitating a study group or online discussion forum
   - facilitating faculty-guided independent study
   - announcements, email, or social media check-ins initiated by the instructor about aspects of the course, additional guidance, etc.

Additional Information from TCC


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