

Regular and Substantive Interaction (RSI) in Distance Education¹:

Information and Guidance for Faculty

Distance Education Defined: *Education that uses one or more of the technologies listed in paragraphs (1)(i) through (1)(iv) of this definition to deliver instruction to students who are separated from the instructor or instructors, and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.*

1. The technologies that may be used to offer distance education include —
 1. The internet;
 2. One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
 3. Audio conferencing; or
 4. Other media used in a course in conjunction with any of the technologies listed in paragraphs (1)(i) through (1)(iii) of this definition.
2. For purposes of this definition, **an instructor is an individual responsible for delivering course content** and who meets the qualifications for instruction established by the institution's accrediting agency.
3. For purposes of this definition, **substantive interaction is engaging students in teaching, learning, and assessment**, consistent with the content under discussion, and **also includes at least two of the following**—
 1. Providing direct instruction;
 2. Assessing or providing feedback on a student's coursework;
 3. Providing information or responding to questions about the content of a course or competency;
 4. Facilitating a group discussion regarding the content of a course or competency; or,
 5. Other instructional activities approved by the institution's or program's accrediting agency.
4. 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—
 1. Providing the opportunity for substantive interactions with the student on a **predictable and regular basis** commensurate with the length of time and the amount of content in the course or competency; and
 2. **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.

Although modes and types of interaction may vary, to be regular and substantive, it must:

- Be instructor-initiated.
- Be frequent, scheduled and predictable.
- Be academic/related to the course, focused on the course subject and requirements.

In addition, instructors must be responsive to student requests, and their engagement with students must be prompt and proactive. Students likewise must have an opportunity to interact with one another.

¹ For compliance with [34 CFR 600.2: Distance Education and Innovation](#).
Additional requirements and guidance are applicable under MSCHE accreditation.

Other regulatory & accreditation requirements, and institutional policies, regarding credit and contact hours apply to any modality of course/program delivery. Institutions must ensure that they can document the length of a course in weeks of instruction and the number of credit hours, or the equivalent associated with the course or competency, and how required contact time is assured.

Institutions are expected to develop and maintain policies and procedures to monitor and assure RSI standards are consistently applied and met. Such materials are likely to be the basis for compliance monitoring by federal and accrediting bodies. Although there is no unique review timetable currently set for federal compliance monitoring of distance education and RSI, the Department of Education will likely review compliance during its periodic Title IV review of the University. Middle States will review compliance during the institutional accreditation process, and there are other unique distance education policies/approvals/reviews in place there where compliance may be examined. Programs holding separate accreditation may also have to demonstrate compliance during those reviews as well.

Compliance with distance education regulations is a requirement for Title IV federal aid eligibility.

Examples of what is **not** RSI:

- Pre-recorded video lectures available for students to watch at their own pace not associated with an assignment, discussion, quiz, etc.
- Only student-solicited office hours offered.
- A student logging into a live webinar with no opportunity for interaction.
- Interaction that is wholly optional or initiated primarily by the student.
- Assignment of recorded webinars, videos, and reading materials if the course design does not require the students to review the assigned material and then interact with the instructor.
- Contact with instructors not related to the course subject matter.
- Adding numeric grades to the course gradebook.
- Instruction or assessments delivered by a 3rd-party vendor system without the institutional faculty member engaging in any of the substantive interaction activities. (*Note – other rules/limitations about 3rd parties in course/program delivery apply*).
- A student submits a quiz or other assignment that is automatically graded.
- Welcome messages during the first week of class and another around mid-semester.
- Encouraging students to participate in an optional, one-time online review session before the final exam.
- Posting an announcement or reminders about an upcoming assignment deadline.
- Providing an open-ended online forum that is not moderated by the instructor.
- Courses *without* at least two of the methods listed (above) for substantive interaction.