Regular and Substantive Interaction

The recent Distance Education and Innovation regulation requires online courses to support regular (such as weekly) and substantive (such as facilitating group discussions) interaction between students and the instructor. An institution's access to federal financial aid could be jeopardized if the majority of its online courses lack regular and substantive interaction (RSI) between students and the instructor.

In addition to being a federal requirement, RSI principles have also been adopted as part of FSCJ's QEP. QueST Faculty Outcome 1 is to construct online courses that promote regular and substantive instructor interaction.

This document aims to share the Online Faculty Advisory Committee's guidance on this matter. The document focuses only on ways we can comply with the federal RSI requirements in online courses. You may refer to the FSCJ Online Course Rubric developed as part of the institution's current QEP for improving your overall online course design.

Substantive Interaction

USDOE explains substantive interaction as engaging students in teaching, learning, and assessment consistent with the course content. Instructors also must pick **at least two interaction methods** from the following list and use them regularly in their online classes. Below are details on each interaction method, along with advice from the online advisory committee on how to use them.

1. "Providing direct instruction"

According to USDOE, direct instruction is live, synchronous instruction where both the instructor and the student are online and communicating at the same time. Live online courses will satisfy this requirement due to regular virtual class meetings. There are no required course activities in asynchronous online courses that support direct instruction. The following are possible optional ways to incorporate direct instruction in asynchronous online courses.

- Conducting nonmandatory virtual class meetings (optional for students to attend)
- Synchronously interacting with students via chat at a scheduled time

2. "Assessing or providing feedback on a student's coursework"

Auto-graded assignments, adaptive learning homework, and interactions with artificial intelligence will NOT meet this specific requirement for RSI; the instructor's direct involvement in grading/assessing or providing feedback is expected for this option. The

following are the possible forms of assessing or providing feedback on a student's coursework.

- Regular grading and instructor feedback on assignments
- Use of rubric to grade assignments with textual or audio feedback provided to each student
- Instructor's feedback on individual student's performance in auto-graded assignments (such as via the comment option in the Canvas grade book)

3. "Providing information or responding to questions about the content of a course or competency"

Course content-related information can be provided in multiple ways, including regular announcements, but announcements serving only as assignment due date reminders may not be considered substantive. The following are some course activities that could satisfy this requirement.

- Posting regular announcements introducing or explaining the course content
- Maintaining weekly office hours to provide information and answer students' questions
- Providing manual feedback to the entire class on topics students struggled with in auto-graded assignments
- Providing module-specific "Module Questions" forums that encourage students to post regular questions for the instructor

4. "Facilitating a group discussion regarding the content of a course or competency"

The following are several online discussion forum models that will satisfy the substantive interaction requirement.

- Contributing to/coaching students in online discussion forums
- Providing a summary/wrap-up post at the conclusion of discussions
- Using discussion platforms, such as Perusall and Packback, with instructor engagement in facilitating the discussions

5. "Other instructional activities approved by the institution's or program's accrediting agency"

There is no available guidance yet from the institution's accrediting agency. Refer to your program's accrediting agency for additional guidance.

Regular Interaction

The two requirements for regular interaction are explained below; both are needed to satisfy the "regular" portion of the federally mandated RSI guidelines.

1. "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."

This means the frequency of substantive interactions depends upon a course's session length (15, 12, 7, or 4 weeks). The Online Faculty Advisory Committee recommends the following to meet this requirement.

- At least two forms of substantive interactions weekly or every other week for 15-week and 12-week sessions.
- At least two forms of substantive interactions weekly for 7-week sessions.
- At least two forms of substantive interactions twice a week for 4-week sessions.

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."

Instructors may meet this requirement by adopting the recommendations listed below. (Simply referring students to tutoring services or submitting early alerts will NOT satisfy this requirement, but we recommend continuing these practices to provide additional institutional support to struggling students.)

- Monitoring students' performance and progress in course assignments/assessments/activities on a weekly basis
- Followed by
  - Contacting struggling students individually or collectively to assist with or address missing submissions/poor grades
  - Contacting students with proposed meeting times or office hours to discuss course content further
  - Directing students to office hours through grading feedback
  - Leading students for follow-up conversations with the instructor through grading feedback

In conclusion, USDOE's intention behind the new regulation is to ensure instruction, grading and feedback, group discussions and other course activities are facilitated by the instructor in online courses rather than entirely by technologies. The committee believes our guidance will assist faculty and adjuncts in enhancing instructor presence in their online courses in addition to meeting regulatory compliance.

References:

1. [Distance Education and Innovation - A Rule by the Education Department on 09/02/2020 (refer to page 54,809)](#)
2. [United States Department of Education, Office of Postsecondary Education's letter to WCET SAN](#)
3. [Regular and Substantive Interaction Refresh: Reviewing & Sharing Our Best Interpretation of Current Guidance and Requirements – WCET Blogpost](#)
4. [Regular and Substantive Interaction Update: Where Do We Go from Here? WCET Blogpost](#)
5. [Clarity, Confusion on 'Regular and Substantive Interaction – IHE Blogpost](#)
6. [Regular and Substantive Interaction: Resources to Support Learning, Neuroplasticity, and Regulations – WCET Blogpost](#)