New Federal Requirements for Distance Education: Regular and Substantive Interaction (RSI)

Background Information:

The [US Department of Education](#) (DOE) has issued new regulations for distance education, effective on July 1, 2021. The new regulations specifically define "distance education" (as compared to "correspondence education"), "regular and substantive interaction between the students and the instructor(s) in a course", and "academic engagement". These new requirements apply to all distance education courses (synchronous and asynchronous) for which students may use Title IV funds (Federal financial aid).

Regular and substantive interaction (RSI) between students and instructors is the key element that distinguishes distance education from correspondence education. This distinction is very important because correspondence courses are not typically eligible for Federal financial aid. To be eligible for financial aid, all distance education courses must be in compliance with the new definitions for RSI and academic engagement. The relevant definitions are explained below, along with recommendations for building RSI and academic engagement into course design.

Correspondence course: (1) A course provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including

examinations on the materials, to students who are separated from the instructor. **Interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student.** Correspondence courses are typically self-paced.

Distance education means education that uses one or more of the technologies listed below 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. The technologies may 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) Video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3) of this definition.

Definition of Regular and Substantive Interaction (RSI):

In the new regulations for "regular and substantive interaction" in distance education, "**regular**" is defined as taking place on a "**predictable and scheduled basis**" throughout the course, and "**substantive**" means students are engaged in a course through teaching, learning, and assessments as well as **at least two of these five activities:**

1. providing direct instruction.
2. assessing or providing feedback on a student's course work.

3. providing information or responding to questions about the content course or competency.

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

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

Three essential characteristics of RSI:

1. Initiated by the Instructor,

2. Frequent and Consistent, and

3. Focused on the Course Subject.

Regular Interaction:

Regular interaction means that the institution provides 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, monitors the student's academic engagement and success, and ensures that the instructor(s) are 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. Regular interaction is predictable and built into the course design. The expectation is that online and face-to-face students have equal access to their instructors.

☑ Examples of Regular Interaction:

- Faculty presence, guidance, and initiation of contact.

- Participation in regularly scheduled learning sessions.

- The flow, sequence, and deadlines of the course are directed by the instructor and the timing of the course is set through use of learning activities, online discussion, lectures.

- Interaction with students happens frequently and students grow to expect it.

- Announcements concerning course assignments and additional guidance are made by the instructor via the Learning Management System (LMS) at strategic points throughout the course.

- Assignments and assessment deadlines that are spread throughout the term of the class

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Substantive interaction:

Substantive interaction is defined as "engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes 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." In short it refers to instructor-initiated

interaction which is academic in nature, dealing with the subject area and the course content.

✅ **Examples of Substantive Interaction:**

- Follow-up questions on a discussion board to assist students in reaching a higher learning potential.

- Constructive feedback on student assignments, which identifies specifically what has been done correctly, needs improvement, or guides students to the next steps of learning. Brief comments like "good job" or "you need to improve" are not substantive.

- Course materials (ex. recorded webinars, videos, and reading materials) which facilitate synchronous or asynchronous interactions and require the student to contact the instructor or participate in an online discussion moderated by the instructor

- Instructor announcements to the class regarding course content and upcoming assignments.

- Synchronous online meetings and chats that further explore course material and answer student questions.

- Provide an overview video to accompany recorded lectures.

- Identify students struggling to reach mastery through observation of discussion activity, assessment completion, or even user activity and offer additional opportunities for interaction.

- Use of small working/study groups that are moderated by the instructor.

🚫 Examples of What is Not Considered RSI:

- Assignment of recorded webinars, videos, and reading materials which 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.

- A student submits a quiz that is automatically graded.

- Sending a welcome message 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.

- Reminding students of the course attendance policy.

- Posting an announcement about an upcoming assignment deadline.

- Providing an open-ended online forum that is not moderated by the instructor.

📖 Recommendations to ensure RSI in your remote course:

- Design your course **from the ground up** to integrate strategic points for faculty interaction throughout the duration of the course.

- Build at least two of the five required RSI activities into your course syllabus and ensure that you carry out these activities regularly throughout the duration of the course.

- Develop a **communication plan** to help guide and manage your interactions.

- **Identify students** struggling to reach mastery through observation of discussion activity, assessment completion, or even user activity and offer additional opportunities for interaction.

- **Provide and post online office hours**.

- Conduct **regularly scheduled online review sessions**, tutorials, or individual appointments.

- **Set clear expectations** for academic engagement in the syllabus and monitor student engagement using the Canvas Analytics tools.

- Provide **timely, individualized, and in-depth feedback** on student work.

- Actively **facilitate online discussions** and chats.

- Choose online tools and learning environments that make interactions easy and easy to document as an **evidence for RSI.**

New Federal Requirement for Faculty to Monitor Student Academic Engagement

Instructors **must monitor** each student's engagement and substantively engage with students on the basis of that monitoring and be responsive to students' request for instructional support. Monitoring a student's "**academic engagement and success**" (defined below) may include:

- Evaluating a student's level of participation in synchronous class sessions;

- Monitoring the student's activity on course websites or materials;

- Considering the quality of the student's coursework or understanding; or

- Other forms of monitoring the student's engagement and success.

This monitoring can be done through the Canvas LMS using the Analytics feature in each of your courses.

NEW Definition of Academic Engagement:

Academic engagement: Active participation by a student in an instructional activity related to the student's course of study that

(1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;

(2) Includes, but is not limited to

(i) Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students.

(ii) Submitting an academic assignment.

(iii) Taking an assessment or an exam.

(iv) Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction.

(v) Participating in a study group, group project, or an online discussion that is assigned by the institution; or

(vi) Interacting with an instructor about academic matters; and

(3) Does not include:

- Logging into an online class or tutorial without any further participation; or

- Participating in academic counseling or advisement

Why St. John's University Must Ensure RSI Compliance

Institution must ensure regular and substantive interaction between a student and instructor prior to the student's completion of a course or competency.

Individual faculty members must ensure compliance with RSI as well as monitoring of student academic engagement (as described above).

- What if we cannot show evidence of RSI?
  - It is possible in an audit for us to be "deemed" as offering 'correspondence study', which are not eligible for financial aid.
  - If >50% of classes are deemed to be 'correspondence study', we can lose all Federal financial aid.
- Faculty members are in the best position to provide the evidence of RSI (not new/in the spotlight now).
- Use of Canvas LMS provides evidence of RSI.

SUNY Empire University's RSI scale:

Since there are no quantitative requirements for RSI in your course, SUNY developed a scale to help faculty self-assess their own course and be flexible and creative in the course design and delivery. Below is the scale with annotation:
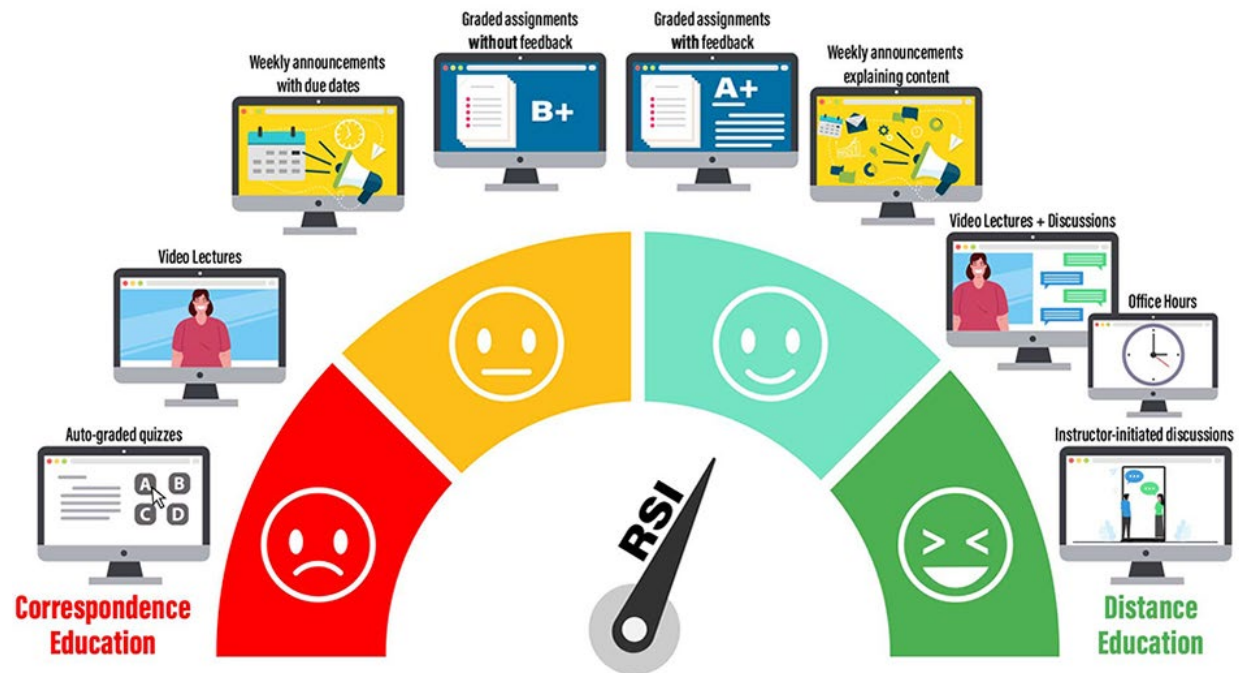

Image Credit: copyright @ SUNY Empire State College

You can get further information at SUNY Empire University website:

https://www.esc.edu/dlis/design-your-course/regular-and-substantive-interaction/

Checklist for Your Course:

Faculty Interaction	In my course	Tools I can/or have used
Regular interactions:		
Threaded discussion forums with regular and appropriate instructor participation based on course topics addressed to all students and/or to individuals publicly.		Discussion forums
Regular "Announcements" posted in the class.		LMS Announcement
Regular deadlines, distributed throughout the term of the course, for assignments and other student participation.		Syllabus, calendar of due dates, Reminders
Regular, timely, appropriate feedback and evaluations of student work.		Grade feedback, constructive, formative and summative feedback
Provide and post routine online office hours		Weekly virtual office hours via WebEx or other web conferencing tools
Instructor-provided online lectures, podcasts or other forms of course content and		Weekly Modules contains lessons, books, lecture documents, video, audio, podcasts

topics, presented in an appropriate format for the subject, such as written documents, audio and/or video files, and/or introductions and explanations for any publisher created materials (written, audio and/or video, etc.) that, combined with other course materials, creates the "virtual equivalent" of the face-to-face class.		
Instructor-prepared syllabus, specific to each distance education course section, to set clear expectations for interaction between the students and the instructor.		Syllabus communication plan section

Substantive Interactions:

Instructor-guided introductions, especially at the beginning of the class, or at important intervals.		Self introduction discussion forum Ice-breaker activities
Weekly assessments		Assignments quizzes, group and individual projects s
Questions posed on the discussion board that encourage critical thinking skills and promote interaction among all course participants.		discussion forums

Regular participation by the instructor in discussion activities with students, perhaps to provide a summary, to correct errors of fact, to keep the discussion on topic, and/or to add expertise to the content of the discussion.		discussion forums
Monitoring student interaction and activity to ensure that they participate fully.		LMS activity tracking, analytics tools
Create a specific forum for questions regarding course content.		Q&A discussion forum, student café discussion forum
Asking students for feedback about the course on a regular basis and revising the content as needed to address issues identified.		LMS email, survey of course
Constructive feedback on student assignments, which identifies specifically what has been done correctly, needs improvement, or guides students to the next steps of learning.		Rubrics, personalized feedback for assessments and discussions, wrap-up video after each module

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