



REGULAR & SUBSTANTIVE INTERACTION: What Does this Mean?

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Distance Education

A distance education program at a domestic school is considered an eligible FSA program if it has been accredited by an accrediting agency recognized by the Department for accreditation of distance education. It is not subject to the rules that apply to correspondence coursework, which are discussed in the next section.

Distance education means education that uses certain technologies to deliver instruction to students who are separated from the instructor and **to support regular and substantive interaction between the students and the instructor**. The interaction may be synchronous (student and instructor are in communication at the same time) or asynchronous. The technologies may include the Internet; audio conferencing; or one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices.

A course taught through video cassettes or discs is also considered a distance education course but only if one of the three technologies listed is used to support interaction between the students and the instructor.

Why is Regular & Substantive Interaction important?

- Regardless of delivery method courses must be equivalent in student outcomes and instructor/student interaction.
- Without regular and substantive instructor/student interaction, the course is considered to be a correspondence course. Correspondence courses are treated much differently in regard to federal financial aid.
- More schools are developing Competency-Based programs which must have regular and substantive interaction built in or these are viewed a correspondence courses by U.S. Department of Education.
- Courses without regular and substantive interaction may be inferior in quality.
- Heightened concerns regarding fraud and abuse of Title IV funds.





U.S. DEPARTMENT OF EDUCATION (ED) IS LOOKING CLOSER AT REGULAR AND SUBSTANTIVE INTERACTION!

- Office of Inspector General Final Audit Report 2014

This report found ED was not sufficiently monitoring distance education programs in three areas:

- ✓ Verification of Initial Attendance
- ✓ Last Date of Attendance
- ✓ Regular and Substantive Interaction

(Note: <https://www.insidehighered.com/news/2017/09/22/education-depts-inspector-general-calls-western-governors-repay-713-million-federal>)

What Is and Isn't Regulation and Substantive Interaction

Regular and Substantive Interaction

- Predictable and regular (structured) instructor-initiated interactions
- Substantive interactions are substantial and related to the academic subject matter of the course
- Substantive interactions must be provided by a faculty member who meets accrediting agency requirements in the subject matter under discussion.
- Faculty supervised-discussion groups.
- Regular submissions of assignments where faculty provide substantive, written feedback.
- Must occur each week that is scheduled as part of the course
- Reciprocal interaction

Not Regular and Substantive Interaction

- Student-initiated interactions only
- Sporadic and unpredictable interactions between instructor and students.
- “I agree” or “Good point.” in discussion threads
- Auto-graded assignments or tests
- Simply supplying a grade on an assignment without providing constructive feedback.
- Classes where students work at their own pace; self-paced classes.
- Instructor emails to individual students

How Do Schools Ensure Compliance with This Requirement?

- Ensure classes are not self-paced!
- Develop institutional requirements and expectations for regular and substantive interaction.
- Provide instructors with expectations for regular and substantive interaction.
- Provide students with expectations for regular and substantive interaction.
- Monitor courses for regular and substantive interaction.