

Background: Definitions of Distance Education and Correspondence Courses

The U.S. Department of Education issued [Final Rules on Distance Education and Innovation](#) in September 2020, with the rules going into effect on July 1, 2021. The new regulations update the definitions of distance and correspondence education with the intent to provide more clarity on the differences between these two modes of course delivery. The U.S. Department of Education requires that all online courses for which students may use Title IV funds (federal financial aid) include regular and substantive interaction between students and instructors. In short, regular and substantive interaction (RSI) is one of the key elements distinguishing distance education from correspondence education and thus one of the central determinates for students’ ability to use Title IV funds.

Four other critical factors distinguishing distance education from correspondence education are as follows:

- Distance education should be delivered through an “appropriate” form of online media.
- Distance education must use instructors that meet accreditor requirements for instruction in the subject matter.
- There should be at least two forms of substantive interaction (see below).
- There must be “scheduled and predictable” opportunities for instructor/student interaction (see below).
- Instructors must be responsive to students’ requests for support (U.S. Department of Education Issues Final Rules on Distance Education and Innovation | NC-SARA, 2020))

Distance Education	Correspondence Education
<p><i>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.</i></p> <p>1. <i>The technologies that may be used to offer distance education include —</i></p> <ol style="list-style-type: none"> 1. <i>The internet;</i> 2. <i>One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;</i> 	<p><i>(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.</i></p> <p><i>(2) If a course is part correspondence and part residential training, the Secretary considers the course to be a correspondence course.</i></p> <p><i>(3) A correspondence course is not distance education.</i></p>

Distance Education	Correspondence Education
<p>3. <i>Audio conferencing; or</i></p> <p>4. <i>Other media used in a course in conjunction with any of the technologies listed in paragraphs (1)(i) through (1)(iii) of this definition.</i></p> <p>2. <i>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.</i></p> <p>3. <i>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—</i></p> <ul style="list-style-type: none"> <i>o Providing direct instruction;</i> <i>o Assessing or providing feedback on a student's coursework;</i> <i>o Providing information or responding to questions about the content of a course or competency;</i> <i>o Facilitating a group discussion regarding the content of a course or competency; or,</i> <i>o Other instructional activities approved by the institution's or program's accrediting agency.</i> <p>2. <i>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></p> <ul style="list-style-type: none"> <i>o 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</i> <i>o 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.</i> 	

Regular and Substantive Interaction (RSI)

Including regular and substantive interaction in courses is more than a federal requirement. It is also a hallmark of effective teaching. Decades of research have established that teacher-student interactions are an essential component of learning. So, while it may be tempting to see the U.S. Department of Education's mandate as a burden imposed from outside the college, the reality is that ensuring regular and substantive interaction is entirely consistent with the best practices of online course design and delivery. In response to the new regulations, our [CUH Peer Review Checklist](#) now includes RSI criteria (still needs to be updated). For interactions to be considered RSI, they need to meet the following characteristics:

- They should be mostly instructor-initiated
- They need to be regular, scheduled and predictable, and
- They must be substantive, i.e. focused on the course subject.

Each of the interactions will be defined and examples of each will be provided.

Instructor-Initiated Interaction

To differentiate distance education courses from correspondence courses, where students are responsible for initiating contact, the interactions need to be started by the instructor. The instructor should expect to take an active part in initiating and guiding a range of interactions with the students throughout the semester. This ensures that interactions are not optional and left up to each student's individual discretion, rather, they are an integral part of the instructional plan for the course.

Examples: individualized emails, instructor-facilitated discussions, scheduled virtual office hours, personalized feedback on assignments

Regular, Scheduled, and Predictable Interactions

Interactions with students should be frequently and consistently repeated throughout the semester. This means that once a course begins, long intervals of time should not pass between the initial instructor interaction with students. The mode of interaction may vary throughout the course depending on the instructor aims and the needs of the students. But the regular flow of interactions should remain as consistent as possible. To be scheduled and predictable, course design

materials should describe the expected frequency of interaction with the instructor, including times and dates of the virtual office hours if applicable, grading feedback, announcements, and potential email communication.

Examples: weekly course announcements written specifically for the course, weekly summaries or highlights of discussion posts, regularly scheduled online review or help sessions

Substantive Interactions

Interactions should be connected to the subject of the course and contribute to the students' progress toward course, program, and college learning objectives. Routine procedural interactions, such as reminders of upcoming deadlines or activities like assigning grades are not 'substantive' on their own unless they are accompanied by personalized feedback or suggestions for improvement. This does not mean that interactions designed to welcome students or build classroom community are not important, merely that they are not sufficient by themselves.

Examples: announcements previewing or reviewing difficult content, emails previewing concepts introduced in the next unit, and listing questions for students to have in mind when reading the textbook chapters

Strategies for Including RSI via Course Design and Course Delivery

Regulations do not dictate what activities to use and how often to include them in the course to meet the RSI requirement. We can think of these regulations in terms of a scale as shown on the following page that allows us to be flexible and creative when designing our online courses.

For instance, the recorded lectures on their own are not considered to be RSI, but if the recorded lectures are followed by the discussion forums on the topics and issues raised in the videos, that would make them RSI. Auto-graded quizzes do not provide the opportunity for interactions and personalized feedback. If the instructor follows up with the extensive summary of the most common mistakes on the quizzes and provides additional instructional support and ways for students to reach out with questions, this will move these quizzes closer to the RSI.

There are many strategies for including RSI in online courses through course design, delivery techniques, and approaches. Course delivery components can be designed in advance and added as hidden course elements to support and guide instructors' interaction with students. Resources for common misperceptions, timely tips and anticipated areas of struggle can be designed and included for instructors to draw upon during the course. For example, content summaries, module previews, and reading guides can be incorporated in personalized emails and announcements as additional support for students who need it.



Course Design and Delivery Strategies: Mix and Match

Design	Delivery
<p>Course includes the option and tools for instructors to hold optional virtual office hours. The tools can be hidden and used only by the instructors interested in this option.</p>	<p>Instructor unhides the virtual office hours links and updates the syllabus to include times 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.</p>
<p>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 to 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.</p>	<p>Instructor updates the syllabus to identify preferred methods of communication, expected frequency of communication, and information about synchronous meetings if applicable.</p>
<p>Course includes easily accessible instructor contact information with instructor name, email, and preferred phone number.</p>	<p>Instructor personalizes contact information before the course is open to students.</p>
<p>Course includes Announcements that offer one-way, public communication from instructor to students. Course can include recommended announcements written by the course developer to provide additional guidelines for instructors teaching the course for the first time.</p>	<p>Instructor regularly posts Announcements. While announcements usually cover the procedural information, such as reminders of course deadlines, they should also be used to support instruction, e.g. synthesize and then comment on questions from previous week, note trends observed in assignments or quizzes.</p>
<p>“Ask a Question” discussion forum is included in the course for students to openly ask questions about the weekly course material to be answered by the instructor and/or other students.</p>	<p>Instructor encourages students to use the “Ask a Question” discussion forum and regularly checks for questions.</p>

Design	Delivery
<p>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 (I.e., Icebreaker discussion area where students introduce themselves, the first synchronous session where students introduce themselves, etc.).</p>	<p>Instructor posts her/his introduction in this high-engagement activity and actively participates in it.</p>
<p>Instructor-facilitated discussion forums are included throughout the course if applicable to the course context and outcomes. The discussions are designed to allow for the instructor to engage with students and students to engage with each other.</p>	<p>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. Consider different discussion response techniques such as individual responses, summary responses or posting an announcement with the favorite ideas, most common misconceptions, counter points.</p>
<p>Learning activities/assessments that require timely instructor feedback via detailed rubrics and written comments.</p>	<p>Instructor utilizes course rubrics and gradebook written comment areas to provide timely feedback on learning activities/assessments. Feedback should communicate to students both their accomplishments and areas they may need to improve as well as concrete suggestions for actions students can take in the future to make progress in their learning.</p>
<p>Course includes a survey midway through the course that provides instructor with feedback as to the content of the course, issues with concepts or assignments, need for additional resources, etc.</p>	<p>Instructor reviews midterm student surveys to make adjustments to the instruction and conduct edits as deemed necessary.</p>
<p>Course includes recorded lectures that are accompanied by the discussion forums or wikis or other activities allowing students to engage with the instructor about the content of the videos.</p>	<p>Instructor participates in the learning activities that accompany recorded lectures to provide additional instruction and clear up misconceptions.</p>

Design	Delivery
<p>Course utilizes online tools and environments that make interactions easy to use and easy to document. External platforms are reviewed and scrutinized to ensure the communication and feedback given to students can be accessed after a course concluded.</p>	<p>Instructor utilizes the college approved and supported technology and tools built within the course to ensure that all the instructor-student and student-student interactions are easy to use and easy to document.</p>

Additional Resources:

- [Luther Rice College and Seminary Guide to Regular and Substantive Interaction in Distance Education](#)
- [Regular and Substantive Interaction \(RSI\) Examples](#)
- [Regular and Substantive Interaction in Online and Distance Learning](#) (The Ohio State University)
- [Regular and Substantive Interaction: Regulatory & Pedagogical Implications presentation by WCET](#) (Recording)
- [The SUNY Online Course Quality Review Rubric OSCQR](#)

References:

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- Poulin, R., & Davis, V. (2019, April 23). [Interpreting what is required for "Regular and substantive interaction"](#). WCET Frontiers.
- [Regular and substantive Interaction: An overview for instructors of online courses at Everett Community College](#). (n.d.). Everett Community College.
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