



Assuring, Measuring, and Documenting Regular and Substantive Interaction (RSI): How EdTech & RSI Coexist

January 11, 2023



Community

Equity

Policy

Practice

wcet.wiche.edu @wcet_info




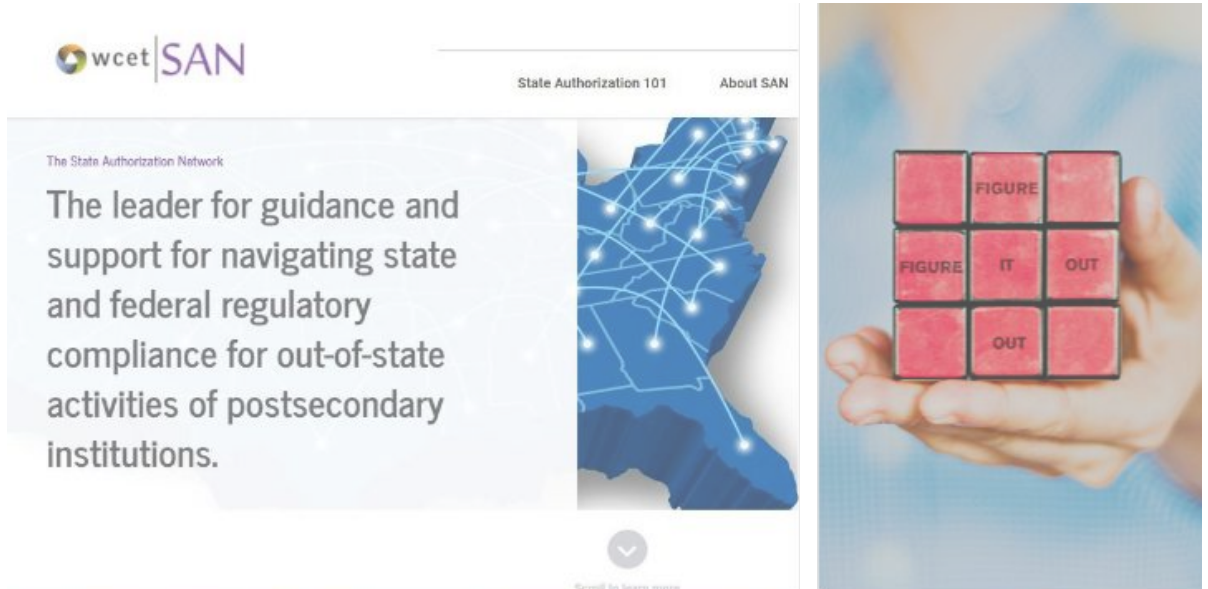
Who we are

The State Authorization Network (SAN) empowers its members to successfully resolve postsecondary regulatory compliance challenges.

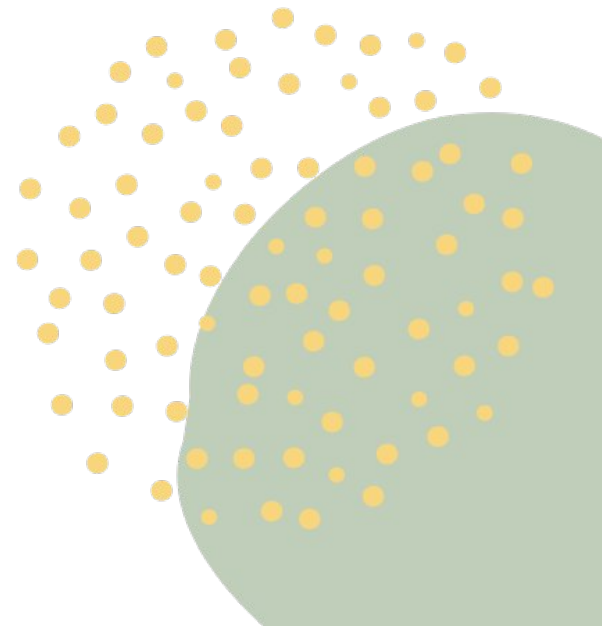
We provide expert analysis, resources and training to prepare for emerging issues, collaborate on compliance strategies, develop solutions and evaluate their efficacy.

Our members are digital learning and compliance professionals representing 800+ institutions and organizations nationally and across all sectors.

 @wcet_info #wcetSAN

A screenshot of the wcet SAN website. The header includes the "wcet | SAN" logo and navigation links for "State Authorization 101" and "About SAN". The main content area features the text: "The State Authorization Network The leader for guidance and support for navigating state and federal regulatory compliance for out-of-state activities of postsecondary institutions." To the right of the text is a blue map of the United States with a network of white lines and dots representing connections. Below the map is a hand holding a 3x3 grid of red blocks, with the words "FIGURE", "IT", and "OUT" written on some of the blocks. A "Scroll to learn more" button is visible at the bottom right of the screenshot.

History of Regular & Substantive Interaction (RSI)





To create the following categories for the ***purpose of determining financial aid eligibility:***



Distance education – which includes RSI and is eligible for federal financial aid.



Correspondence education – which does not include RSI and is eligible for aid in only limited circumstances.

Purpose of Regular & Substantive Interaction

Department of Education

- Reviews may result in fines, loss of financial aid, repayment of tuition, or reclassification of courses

Accreditors

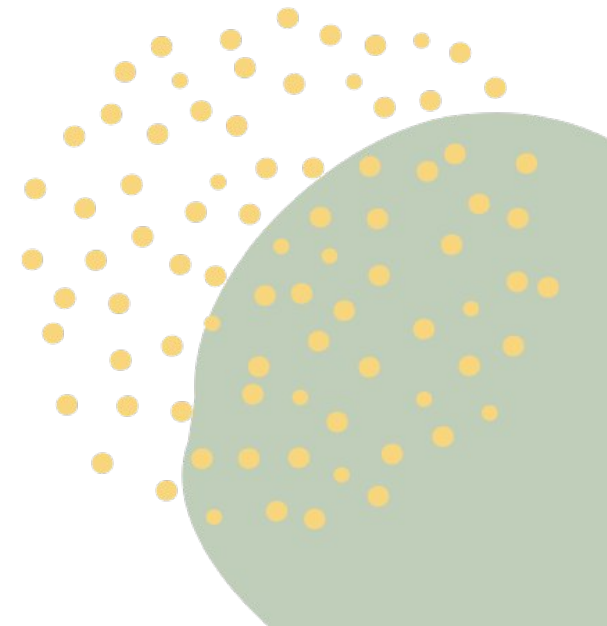
- Reviews may result in sanctions from institutional or programmatic accreditors

Internal Reviews/Audits

- Internal offices or departments may conduct risk assessments or audits
- Student complaints may result in review of practices

Consequences of Noncompliance

Newly Released Regulations & Guidance





New 'Distance Education' Definition

(as of July 1, 2021 - 34 CFR § 600.2 - Definitions)

Education that uses one or more of the **technologies** listed in 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*. [Emphasis Added]

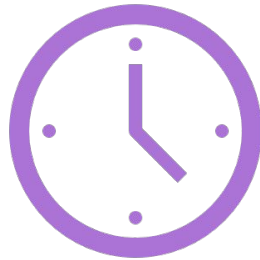
Technologies

The technologies that may be used to offer distance education include -

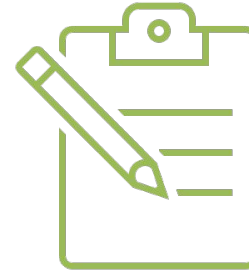
- The internet;
- One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- Audio conference; or
- Other media used in a course in conjunction with any of the technologies listed in paragraphs (2)(i) through (iii) of this definition.

What is Regular Interaction?

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--



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; and



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.



Consistently scheduled discussion posts, content summaries, or office hours



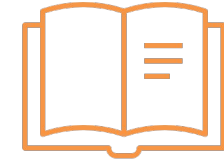
Predictable opportunities for help sessions or opportunities for students to interact with instructor and/or classmates



Post messages to preview upcoming course content on a consistent basis



Planned, regular instructor-initiated communication with individual students concerning course content through email, discussion forum, or other preferred medium



Participation in regularly scheduled learning sessions (where there is an opportunity for direct interaction between the student and the qualified instructor).

Examples of Regular Interaction

What is Substantive Interaction?

engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also include at least two of the following—



Providing direct instruction



Assessing or providing feedback on a student's coursework



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



Facilitating a group discussion regarding the content of a course or competency; or



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

Examples of Substantive Interaction:



FOLLOW-UP
QUESTIONS ON
A DISCUSSION
BOARD



PROVIDE
PERSONALIZED
COMMENTS (IN
ANY MEDIUM)
FOR AN
INDIVIDUAL
STUDENT'S
ASSIGNMENT
OR EXAM



COURSE
MATERIALS
THAT
FACILITATE
INTERACTIONS
BETWEEN
STUDENT(S)
AND
INSTRUCTOR



AN
INSTRUCTOR-M
ODERATED
ONLINE
DISCUSSION
FORUM



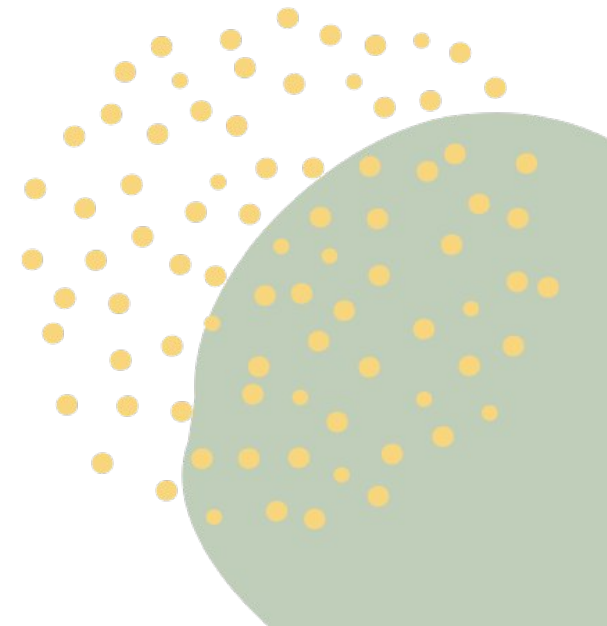
USE OF SMALL
WORKING/STUDY
GROUPS THAT ARE
MODERATED BY
THE INSTRUCTOR

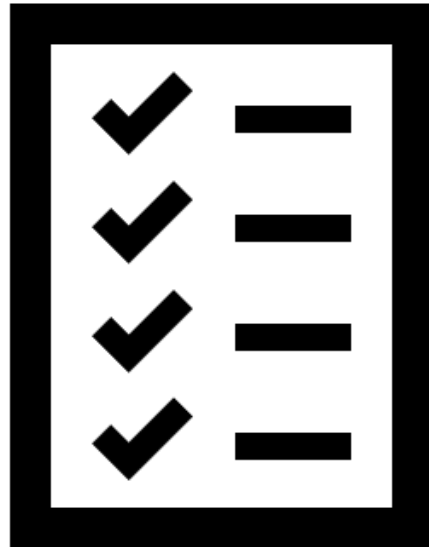
Regular and Substantive Interaction Update (November 2022)



- Key takeaways from recent USED response letter.
- What's next?
- Read the WCET *Frontiers* blog [Regular and Substantive Interaction Update: Where Do We Go from Here?](#) for more!

Compliance Tips & Strategies





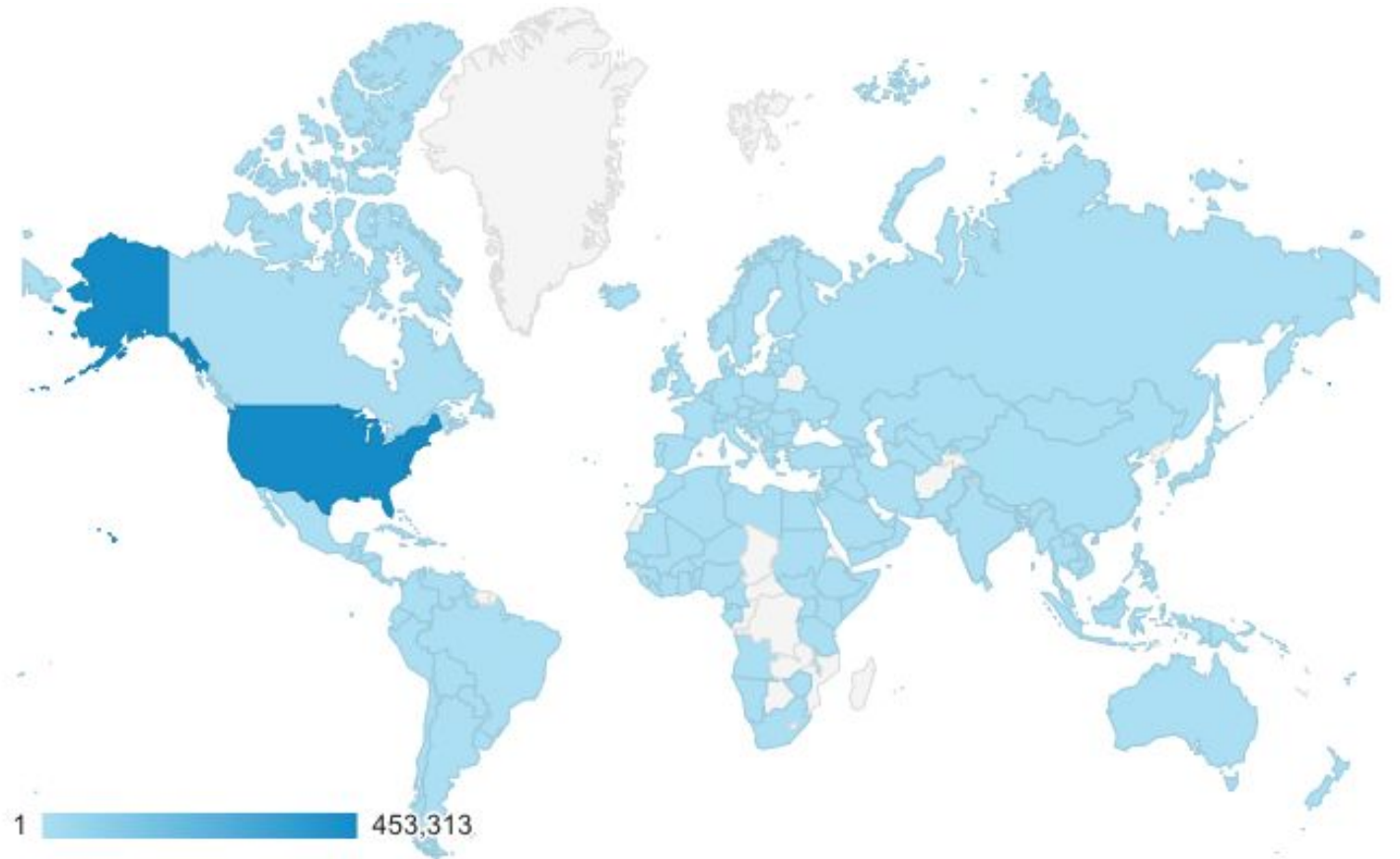
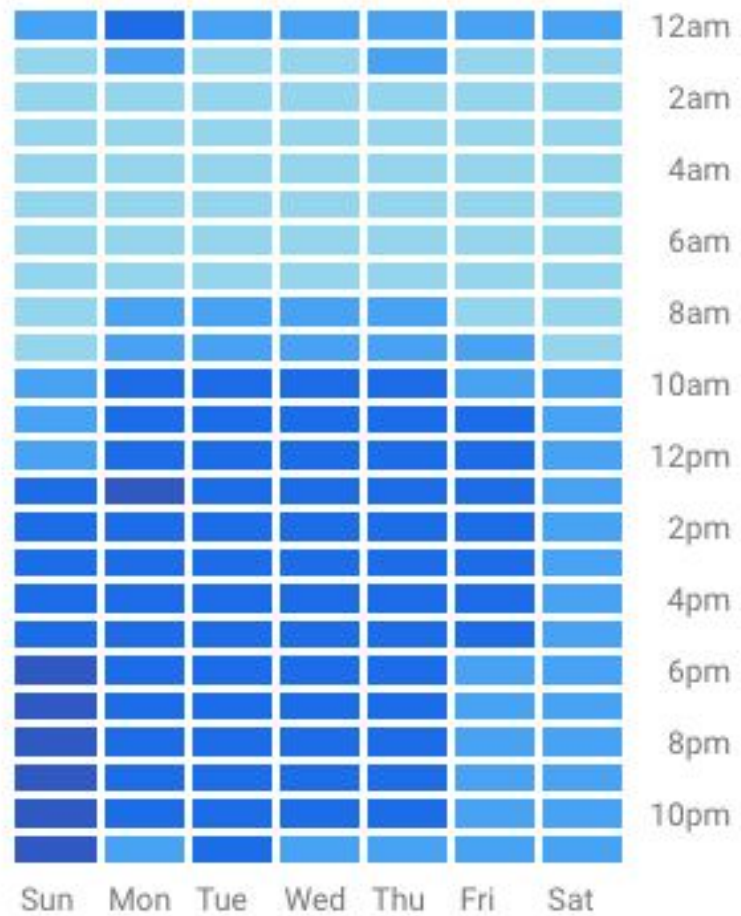
USED will review compliance with these five factors:

- The institution's online instruction is delivered through an appropriate form of media;
- The instructors with whom students regularly and substantively interact meet the requirements of the institution's accrediting agency for instruction in the subject matter;
- Instructors engage in at least two forms of substantive interaction meeting the regulatory requirements for the course or competency;
- The institution has established scheduled and predictable opportunities for substantive interaction between students and instructors and create expectations for instructors to monitor each student's engagement and substantively engage with students on the basis of that monitoring; and
- Instructors are responsive to students' requests for instructional support.



One continuously & globally accessible community

Users by time of day



Source: Google Analytics

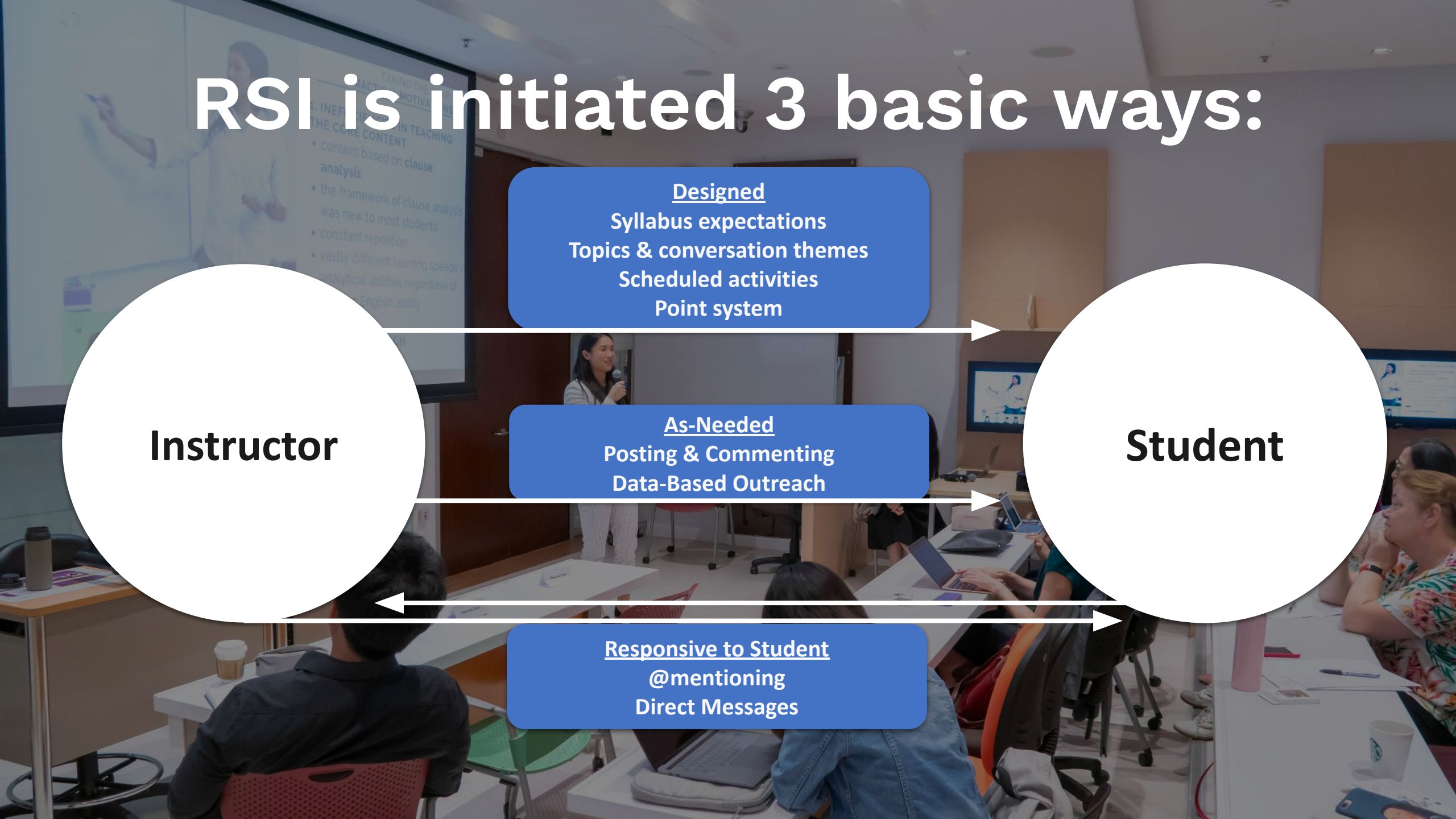
RSI is initiated 3 basic ways:



Designed
Syllabus expectations
Topics & conversation themes
Scheduled activities
Point system

As-Needed
Posting & Commenting
Data-Based Outreach

Responsive to Student
@mentioning
Direct Messages





Course syllabus or other documentation shared with students



Policies or procedures or other university guidelines that create expectations for faculty and instructor relating to regular and substantive interaction



Data from your learning management system and other interactive technologies like Yellowdig

Evidence of Compliance

Evidence of Compliance



Network Graph & Table



Participation Insights from Reminder System



Community & Member Reports

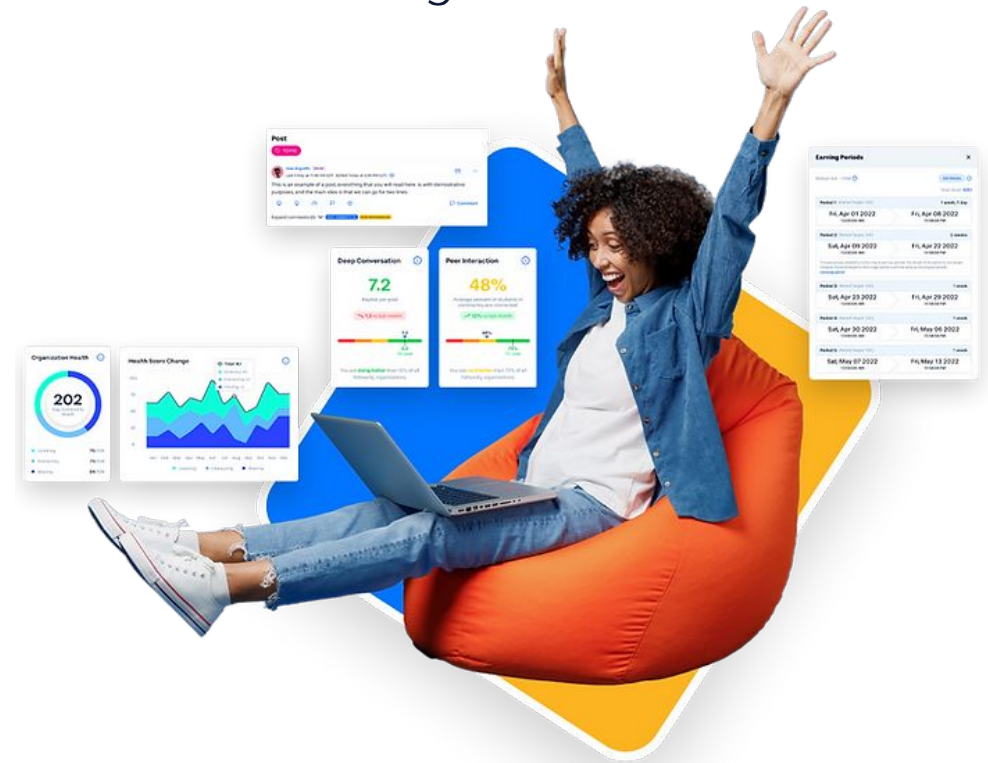


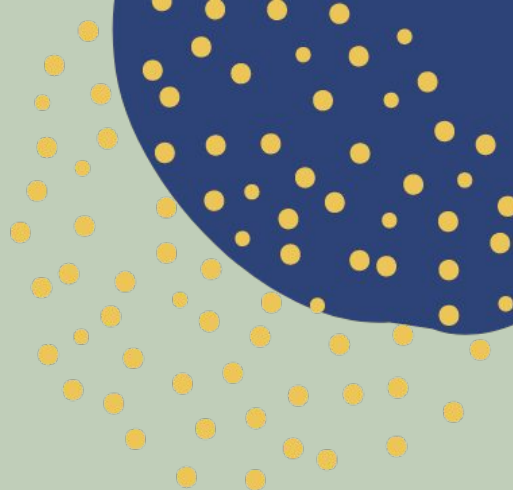
Community Health Dashboard



Data and Attendance Tracking APIs

Yellowdig
Learn together





Questions from the Audience

Continue the Conversation and Learn More!



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WCET

- Visit wcet.wiche.edu to explore WCET's Policy and Practice work, Events, Membership, and Sponsorship.
- [WCET Frontiers blog](#) has several posts on RSI.
- For WCET members – subscribe to emails: bit.ly/wcetsubscribe.

SAN

- Visit wcetsan.wiche.edu to learn more about emerging issues SAN is following, opportunities for engagement, and more.

Yellowdig

- See how Yellowdig helps meet RSI requirements (written in partnership with WCET): explore.yellowdig.co/rsi-download