

“Regular and Substantial Interaction” per Title IV, 2008 HEA

Examples from “Dear Colleague Letter” of 2014 regarding competency-based education

<https://ifap.ed.gov/dpcletters/GEN1423.html>

- Participating in regularly scheduled learning sessions (where there is an opportunity for direct interaction between the student and the faculty member);
- Submitting an academic assignment;
- Taking an exam, an interactive tutorial, or computer-assisted instruction;
- Attending a study group that is assigned by the institution;
- Participating in an online discussion about academic matters;
- Consultations with a faculty mentor to discuss academic course content;

“We do not consider interaction that is wholly optional or initiated primarily by the student to be regular and substantive interaction between students and instructors. Interaction that occurs only upon the request of the student (either electronically or otherwise) would not be considered regular and substantive interaction.

“...evaluating assessments and providing substantive feedback (merely grading a test or paper would not be substantive interaction)...

From the audit of WGU

<https://www2.ed.gov/about/offices/list/oig/auditreports/fy2017/a05m0009.pdf>

We did not consider the following to be instances of substantive interactions between students and instructors:

- Objective assessments that students submitted for evaluation because feedback on objective assessments was computer-generated, was not provided by instructors, and did not facilitate synchronous or asynchronous interaction between students and instructors.
- Recorded webinars, videos, and reading materials if the course design materials did not require the students to watch the webinars or videos and then interact with an instructor. Many course outlines stated only that course mentors were available to students for assistance if the student wanted to contact the course mentor. Had the course design materials indicated that the recorded webinars, videos, and reading materials facilitated synchronous or asynchronous interactions, such as requiring the student to contact an instructor or participate in an online discussion moderated by an instructor, we would have considered those instances to be substantive interaction.
- Contact with student mentors because the accrediting agency’s recognition, the school’s description of the student mentor’s role, and our interviews with six student mentors disclosed that student mentors did not provide instruction on the subject matter of the courses that students were taking.

More counterexamples (from <https://online.umkc.edu/regular-and-substantive-interactions-the-accreditation-dance-of-online-courses/>): “Instructors not logging into their courses or logging into courses for only a few minutes in a week. Courses where instructors had recorded their lectures (some greater than ten or fifteen years ago) and students taking automatically graded quizzes based on those lectures. Courses with absolutely no opportunity for interactions, not even the ability for students to ask questions of the instructor or other students. No online office hours or ways to communicate with the instructor.”