# Policies and Procedures
## Chapter S3 – Educational Policies

ST. CLOUD
TECHNICAL & COMMUNITY
COLLEGE
A member of Minnesota State

## S3.11 Reasonable Substantive Interaction Policy

### Responsible Administrator
Vice President of Academic Affairs & Institutional Effectiveness

### Purpose
Effective July 1, 2021, the Final Rules on Distance Education and Innovation issued by the U.S. Department of Education (DOE) required that all online courses for which students may use Title IV funds "ensure that there is regular and substantive interaction between students and instructors." The DOE has the authority to review distance learning offerings at colleges and universities that receive federal funds. St. Cloud Technical & Community College faculty must ensure that online courses meet requirements for Regular and Substantive Interaction, or RSI, for those courses to be eligible for federal financial aid. RSI is meant to distinguish "correspondence" courses (those with little or no instructor interaction) from "distance" courses (those with significant instructor interaction, and therefore eligible for federal financial aid). SCTCC is not authorized to offer correspondence courses.

Institutions risk losing access to student financial aid if the institution is audited by the US DOE Office of Inspector General, or as part of a periodic Departmental financial aid program review and found to be out of compliance. Institutions may be required to repay financial aid associated with the correspondence courses and students.

### Definitions
Minnesota State Operating Instruction 3.36.1.2 Delivery Methods provides definitions pertinent to the DOE Final Rules.

*Distance education:* Based on a federal definition, education that uses one or more of the technologies listed below 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.

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

a. The internet;
b. One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
c. Audio conference; or
d. Other media used in a course in conjunction with any of the technologies listed in items 1–3 above.

*Instructor:* An instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by the institution's accrediting agency.

*Substantive Interaction*: Substantive interactions engage students in teaching, learning, and assessment, consistent with the content under discussion, and includes at least two of the following:

a. Providing direct instruction.
b. Assessing or providing feedback on a student's coursework;
c. Providing information or responding to questions about the content of a course or competency.

d.  Facilitating a group discussion regarding the content of a course or competency.
e.  Other instructional activities approved by the institution's or program's accrediting agency.

*Predictable Regular Interaction*: Regular interactions between a student and an instructor or instructors occur prior to the student's completion of a course or competency. These regular interactions provide 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. Additionally, regular interactions monitor the student's academic engagement and success and ensure that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed, based on such monitoring, or upon request by the student.

At SCTCC, *regular* is defined as at least weekly.

*Distance education course*: A course section in which at least 75% of the instruction and interaction occurs using one or more of the technologies listed in the definition of distance education, with the faculty and students physically separated from each other.

*Distance education program*: An academic program offered in whole or in part through distance education, regardless of whether a face-to-face, on-ground, or residential option is also available.
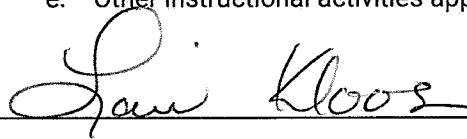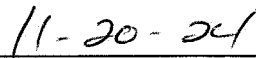
## Policy Statement
St. Cloud Technical & Community College faculty must ensure that their online courses meet U.S. DOE's requirements for Regular and Substantive Interaction, or RSI. All online courses at St. Cloud Technical and Community College will include, at least, weekly Regular and Substantive Interactions with the students throughout the semester. Characteristics of these interactions are:

a.  Initiated by instructor(s)
b.  Regular, scheduled, and predictable interactions
c.  Substantive Interactions - course/subject specific

Instructors will take an active part initiating and guiding a range of interactions throughout each semester. Substantive interactions must include at least two of the following throughout the course term.

a.  Providing direct instruction.
b.  Assessing or providing feedback on a student's coursework;
c.  Providing information or responding to questions about the content of a course or competency.
d.  Facilitating a group discussion regarding the content of a course or competency.
e.  Other instructional activities approved by the institution's or program's accrediting agency.

_Jann Kloos_                                   _11-20-24_

*College President:*                                   *Date:*
*Date of Adoption:*
*Date of Implementation:*
*Date Repealed or Replaced:*

# S3.11 Reasonable Substantive Interaction Procedure

Faculty are responsible for designing their online courses to meet the RSI policy requirements. Faculty must verify that they include at least weekly activity that is instructor initiated; regular, scheduled, and predictable; and substantive.

Examples of activities that meet the intent of RSI include, but are not limited to:

a. Providing direct instruction.
b. Assessing or providing feedback on a student's coursework;
c. Providing information or responding to questions about the content of a course or competency.
d. Facilitating a group discussion regarding the content of a course or competency.
e. Other instructional activities approved by the institution's or program's accrediting agency.
    a. Posting regular announcements relevant to the content of the course
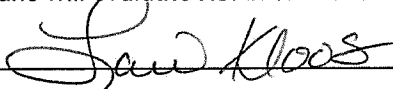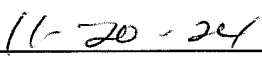
Examples of activities that do not meet the intent of RSI include, but are not limited to:

a. Feedback generated through auto-graded or automated platforms
b. Pre-recorded lectures
c. Discussions where the instructor is not participating either through interaction in the discussion or providing direct feedback
d. Posting weekly announcements that are only reminders about due dates

Activities that do not meet the intent of RSI are not prohibited and may be used but they do not satisfy the intent or RSI for a distance education course.

Faculty can use the RSI Checklist available in the Faculty Guidebook to guide their course design.

Deans will evaluate RSI in online courses as part of the faculty evaluation and observation process.

*College President:* _____    *Date:* 11-20-24

*Date of Adoption:*

*Date of Implementation:*

*Date Repealed or Replaced:*