

Distance Education and Regular & Substantive Interaction Policy and Procedures

Office of Academic Affairs

Section 1: Policy

1.1 Purpose:

The University of Detroit Mercy is committed to providing high-quality distance education that supports student learning, engagement, and academic success while ensuring compliance with:

- U.S. Department of Education (ED) (34 CFR Parts 600, 602 and 668)
- Higher Learning Commission (HLC) accreditation requirements
- Institutional standards for academic quality and integrity

This policy establishes requirements for design, delivery, review, and oversight of all distance education courses and programs, including expectations related to Regular and Substantive Interaction (RSI). Definitions related to this policy are provided in **Appendix A**.

The University recognizes that meaningful faculty-student interaction is a hallmark of effective teaching and student learning and a federal compliance requirement distinguishing distance education from correspondence education.

1.2 Scope:

This policy applies to:

- All distance education courses and programs (synchronous and asynchronous)
- All faculty and instructional staff teaching online
- Academic departments and colleges
- Students enrolled in distance education courses
- Academic support and instructional design units involved in online learning

1.3 Policy Statement:

All University of Detroit Mercy distance education courses must:

- Be designed and delivered with Regular and Substantive Interaction (RSI)
- Demonstrate documented active and ongoing instructor engagement
- Support meaningful academic interaction between faculty and students
- Provide equivalent opportunities for student learning and engagement as traditional course offerings
- Be subject to institutional review and a continuous improvement processes

1.4 Regular and Substantive Interaction:

Regular and Substantive Interaction (RSI) refers to meaningful instructor-initiated engagement between students and instructors that supports teaching, learning, and assessment in distance education courses. RSI consists of two distinct components: regular interaction and substantive interaction.

- **Regular interaction** refers to the frequency, predictability, and ongoing nature of instructor engagement throughout the course.
- **Substantive interaction** refers to the quality and academic purpose of the interaction, meaning the interaction directly supports teaching, learning, or assessment.

These requirements are often met in synchronous courses through live instruction and discussion. In asynchronous courses, however, institutions and instructors must intentionally design and document opportunities for both regular and substantive interaction throughout the instructional period.

To meet RSI requirements, online courses must include documented evidence of interactions that are:

- Instructor initiated
- Regular and predictable
- Academically substantive
- Ongoing throughout the duration of the course

1.4.1 Regular Interaction Standards:

Regular interaction refers to the consistent and predictable presence of the instructor throughout the instructional period. It focuses on how often and how reliably instructors engage with students.

For regular interaction, Instructors:

- Maintain a visible and active instructional presence
- Provide predictable opportunities for academic engagement
- Monitor student participation and progress
- Proactively contact students who are disengaged or academically at risk

Institutional Expectations, including but not limited to:

- Weekly¹ or module-based instructor engagement
- Clearly communicated instructor response timelines for student communication
- Ongoing faculty participation in course activities
- Regular announcements, guidance, and/or instructional updates
- Proactive outreach to absent students after seven consecutive days without course access or communication
- Monitoring student participation through the learning management system (LMS)

¹ Courses offered in shortened or accelerated parts of term may require more frequent contact than once per week to meet established expectations.

1.4.2 Substantive Interaction Standards:

Substantive interaction refers to instructor engagement that is academically meaningful and directly related to teaching, learning, or assessment. It focuses on the instructional quality and educational purpose of the interaction.

Substantive interaction must include at least two of the following, on a recurring basis:

- Providing direct instruction
- Assessing or providing feedback for student coursework
- Responding² to questions regarding course content or expectations
- Facilitating discussions related to course content
- Other instructional activities approved by the institution or accreditor

Interaction must:

- Be academically meaningful
- Advance and support student learning
- Extend beyond administrative or technical communication

1.4.3 Examples of Regular and Substantive Interaction include, but are not limited to:

- Live virtual class sessions
- Instructor-facilitated discussion forums
- Individualized feedback on assignments
- Interactive learning activities designed and guided by faculty
- One-on-one meetings with students, including virtual office hours
- Instructor guidance on collaborative projects
- Timely responses to course content questions
- Weekly¹ academically substantive announcements or summaries

Regular and Substantive Interaction (RSI) is essential because it keeps students engaged, helps clarify uncertainties, promotes deeper understanding of the material, and allows instructors to gauge student progress and provide necessary support. RSI encompasses a wide range of evolving practices for creating active learning communities in a digital space. Examples and Guidance for RSI are provided in **Appendix B**.

Please note that automated or AI initiated feedback may supplement, but not replace, instructor substantive interaction.

Section 2: Procedures

2.1 Faculty Responsibilities

Faculty teaching distance education courses are responsible for:

- Clearly communicating Regular and Substantive Interaction (RSI) expectations and communication practices in the syllabus
- RSI responsibilities must not be delegated or assigned to a Teaching Assistant or any other individual

¹ Courses offered in shortened or accelerated parts of term may require more frequent contact than once per week to meet established expectations.

- Initiating and maintaining RSI
- Providing timely, meaningful, and individualized feedback
- Maintaining an active instructional presence
- Support and monitor student engagement and performance
- Participating in required training
- Maintaining records demonstrating RSI and instructional engagement
- Ensuring the course meets all Course Design Standards (see section 2.2 of this policy)
- Implement practices consistent with institutional accessibility policies
- Participating in required course assessment reviews and/or improvement processes
- Integrate, where appropriate, the University's mission, traditions, and core values into course design, learning activities, and student engagement in the online learning environment.

Faculty should ensure that the level of interaction and engagement is appropriate to:

- Course credit hours
- Course length
- Enrollment size
- Academic discipline
- Course level

2.2 Course Design Standards:

All distance education courses must:

- Meet all institutional course and syllabi standards
- Clearly define learning outcomes and course expectations
- Demonstrate alignment among learning outcomes, assessments, and activities
- Include planned opportunities for Regular and Substantive Interaction (RSI)
- Be organized into structured modules or learning units
- Include the level of expected participation
- Provide and maintain accessible course materials

Courses **MUST NOT**:

- Operate as fully self-paced independent study without faculty oversight
- Rely exclusively or substantively on automated grading or feedback without meaningful instructor engagement
- Depend solely on student-initiated interaction
- Lack documented instructor engagement
- Expect student-to-student interaction to constitute Regular and Substantive Interaction (RSI)

2.3 Student Responsibilities:

Students enrolled in distance education courses are expected to:

- Complete distance education orientation (i.e. Learning Management System Orientation)
- Actively participate in instructional activities

- Engage with course materials and instructor communications
- Maintaining the security of login credentials
- Meet participation and attendance expectations
- Seek assistance when needed
- Maintain academic integrity and comply with university policies
- Meet technology readiness expectations for course/program

2.3.1 Student Support Services

Students enrolled in distance education courses will have access to the same services traditionally available to on-campus University of Detroit Mercy students, including, but not limited to:

- Academic advising
- Technical support
- Library services
- Tutoring and academic support
- Accessibility services
- Title IX support

Support services for distance learners will be comparable in quality and accessibility to services provided for on-campus students provided during standard business hours or prearranged times.

2.4 Student Authentication and Academic Integrity:

The University will verify student identity through:

- Multi-factor secure login credentials
- Learning management system authentication
- Secure proctoring and testing identity verification tools

Students **MAY NOT**

- Use unauthorized System Access or Integration
- Share login credentials with another individual for the purpose of accessing any University accounts or completing coursework on the student's behalf.
- Connect third-party tools, AI agents, or automated systems to university platforms (e.g., LMS, email, cloud storage) without explicit institutional authorization.
- Share login credentials or tokens with external tools or services for the purpose of automation or data extraction.
- Use scripts, bots, or automation tools to scrape, monitor, or interact with course content, assessments, or communications.

2.5 Policy Compliance:

Compliance oversight with this policy resides with the Office of Academic Affairs and Center for Excellence in Teaching and Learning (CETL).

The Deans Office in each school and college along with academic departments within schools and colleges are responsible for ensuring adherence to the policy within their programs and courses.

Course **schedule types** subject to review:

- O1S - Online 100% Synchronous
- O1A - Online 100% Asynchronous
- O2S - Online 75-99% Synchronous
- O2A - Online 75-99% Asynchronous
- HB1 - Hybrid - Online 51-74%
- HB2 - Hybrid - Online 50%, In-Person 50%
- HB3 - Hybrid - Online less than 50%

2.5.1 Distance Education Course Review and Approval Procedures:

2.5.1.1 Initial Approval:

Initial approval must be obtained for all course schedule types listed above where the course meeting times are inconsistent with the University credit hour definition. This requirement includes all asynchronous courses.

1. Complete a [Regular and Substantive Interaction Screening Form](#), per Scheduling Policy section 5
 - a. Describe planned Regular and Substantive Interaction (RSI) strategies for the course
 - b. Submit syllabus for the course
2. CETL staff review completed RSI screening form and syllabus for evidence of best practices for regular and substantive interaction of instructors with students
 - a. If a Regular and Substantive Interaction Plan (RSIP) is required, CETL will provide feedback and consultation to develop a plan
3. If RSI is deemed sufficient via the form, or a RSIP is approved, CETL will provide documentation to the faculty member
4. [UDM Scheduling Standards: Exemption Request](#) must be submitted including CETL documentation and college/school support

2.5.1.2 Annual Review:

The CETL and Office of Academic Affairs will review a selected subset of distance education courses annually to ensure federal, accreditation, and institutional compliance.

Course reviews may evaluate:

- Evidence of Regular and Substantive Interaction (RSI)
- Faculty instructional presence
- Course organization and accessibility
- Student engagement opportunities
- Assessment and feedback practices
- Alignment with institutional standards

Prioritization may occur for:

- Courses that submitted an RSI Plan

- New Faculty
- High DFW courses
- Student feedback/complaint patterns
- Recently converted courses

After review, CETL may:

- Request revisions to improve compliance and continuous improvement
- Recommend additional faculty training
- Perform follow-up review prior to future offering
- Recommend corrective guidance and support
- Monitor institutional compliance with federal, accreditation, and institutional requirements

Persistent non-compliance may result in the temporary suspension of the faculty member's eligibility to teach courses through distance education delivery.

2.5.2 Evidence:

The University will maintain documentation that demonstrates compliance with Regular and Substantive Interaction (RSI) and distance education requirements. Evidence may be reviewed during accreditation or federal audits.

Evidence may include:

- Syllabi and course schedules
- Blackboard activity reports
- Instructor announcements and communications
- Feedback on assignments
- Discussion facilitation records
- Student engagement analytics

2.6 HLC and Federal Compliance

The University will comply with all Higher Learning Commission (HLC) and Department of Education guidelines regarding distance education.

2.6.1 Faculty Qualifications and Professional Development

Faculty teaching distance education courses must:

- Meet standards set by HLC in the [UDM Policy on Determining Qualified Faculty](#)
- Complete distance education training
- Participate in training related to online pedagogy and RSI
- Engage in ongoing professional development opportunities related to distance education

The Center for Excellence in Teaching and Learning (CETL) and Academic Affairs will provide support and training resources.

2.6.2 Programs Offered via Distance Education:

HLC substantive change requirements and federal regulations governing distance education require us to obtain approval for programs offered 50% or more at a distance.

Program leadership must seek required approvals when:

- Expanding distance education offerings
- Offering programs with 50% or more distance education content
- Initiating new distance education programs

Contact the HLC Accreditation Liaison Officer/Executive Director or IR&E if any of these situations apply to your program.

Appendix A: Definitions

Asynchronous Distance Education:

Asynchronous distance education includes instructional activities that do not require faculty and students to participate simultaneously.

Because asynchronous courses do not rely on scheduled real-time meetings, these courses require intentional and clearly documented strategies to ensure regular and substantive interaction (RSI).

Faculty teaching asynchronous courses must:

- Establish predictable and ongoing instructor presence
- Initiate regular academic interaction with students
- Provide timely and substantive feedback
- Monitor student engagement and participation
- Clearly communicate interaction expectations in the syllabus and course design

Correspondence Education:

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 instructors. Interaction between instructors and students in a correspondence course is limited, not regular and substantive, and is primarily initiated by the students. If a course is part correspondence and part residential training, it is considered a correspondence education course. A correspondence education course is not distance education.

Distance Education (*Based on federal definition*):

Education that uses one or more of the technologies listed in paragraphs (2)(i) through (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.

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

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

For purposes of this definition, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution's accrediting agency.

Distance Education Course:

A course in which at least 75% of the instruction and regular and substantive interaction occurs using distance education technologies while students and instructors are physically separated.

Distance Education Program:

A certificate or degree program in which 50% or more of the courses may be taken as distance education courses.

Regular Substantive Interaction (RSI):

RSI refers to meaningful instructor-initiated engagement between students and instructors that supports teaching, learning, and assessment in distance education courses.

Institutions are expected to ensure regular and substantive interaction between students and instructors in their distance education and competency-based education offerings. 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:

1. 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; and
2. 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.

Synchronous Distance Education:

Synchronous distance education includes scheduled instructional activities in which faculty and students interact in real time using technologies such as video conferencing or live virtual classroom environments.

Because synchronous courses include scheduled live instructional engagement, many elements of Regular and Substantive Interaction (RSI) are naturally incorporated through:

- Real-time instruction
- Live discussion
- Immediate feedback
- Scheduled class participation
- Instructor-facilitated engagement

Policy developed by the Office of Academic Affairs in consultation with the Office of Institutional Research & Effectiveness and the Center for Excellence in Teaching and Learning 5.12.26

Appendix B: Examples of Regular and Substantive Interaction

Examples between Students & Instructor

Course Activity	Meets RSI Expectations	Does NOT Meet RSI Expectations
Assignment Feedback	Instructor provides individualized written, audio, or video feedback that helps students improve understanding or performance.	Instructor enters grades only with no comments or guidance.
Automated Quizzes	Instructor reviews quiz performance trends and provides clarifying instruction, targeted feedback, or remediation activities.	Students complete auto-graded quizzes with no instructor review or follow-up.
Capstone or Research Projects	Instructor conducts structured check-ins, provides developmental feedback, and guides academic progress throughout the project.	Students submit milestone work with minimal instructor interaction.
Collaborative Annotation or Reading Activities	Instructor participates in annotations, asks follow-up questions, and guides interpretation of course materials.	Students annotate readings independently with no instructor interaction.
Discussion Forums	Instructor initiates discussion prompts, moderates' conversations, asks probing questions, and provides follow-up commentary tied to course content.	Students only respond to one another with no instructor participation.
Group Projects	Instructor monitors progress, provides guidance, participates in milestone check-ins, and offers feedback during project development.	Students work independently in groups without instructor involvement.
Live Virtual Lecture	Instructor facilitates real-time discussion, polling, Q&A, breakout activities, or guided problem solving during synchronous sessions.	Instructor delivers content without student participation opportunities.
Office Hours	Scheduled virtual sessions where the instructor reviews concepts, answers course-related questions and engages students academically.	Optional office hours with no documented instructional engagement.
Peer Review Activities	Instructor facilitates the review process, provides guidance, and offers feedback or synthesis after peer review activities.	Students exchange peer feedback without instructor participation.

Course Activity	Meets RSI Expectations	Does NOT Meet RSI Expectations
<i>Recorded Lecture</i>	Instructor posts a lecture with embedded questions, follows up in discussion forums, or addresses misconceptions in a weekly ¹ video/message.	Students watch a recorded lecture with no instructor follow-up or interaction.
<i>Reflective Journals</i>	Instructor provides periodic individualized responses that deepen reflection and connect learning concepts.	Journals are submitted but receive no instructor response.
<i>Student Engagement Monitoring</i>	Instructor monitors LMS activity and proactively contacts disengaged or academically at-risk students with support ³ and guidance.	Instructor does not monitor participation or reach out to inactive students.
<i>Student Questions</i>	Instructor regularly answers course-content questions through announcements, discussion boards, video responses, or direct communication.	Students email questions and receive delayed or minimal responses.
<i>Virtual Labs or Simulations</i>	Instructor debriefs simulation outcomes, provides guidance, and facilitates reflection or application discussions.	Students complete simulations independently without instructor involvement.
<i>Weekly¹ Announcements</i>	Weekly ¹ announcements summarize learning themes, clarify misconceptions, connect concepts, and guide upcoming learning activities.	Announcements only contain reminders about due dates or administrative information.

¹ Courses offered in shortened or accelerated parts of term may require more frequent contact than once per week to meet established expectations.