

To: Distance Learning and Innovation Subcommittee  
cc: Scott Filter  
From: Jillian Klein and Leah Matthews (with input from Russ Poulin)  
Date: February 11, 2019  
RE: Proposed Definitions for Regular and Substantive Interaction

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*Distance education* means education that uses one or more of the technologies listed in paragraphs (1) through (4) of this definition to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. ~~The technologies may include—~~

1. The technologies that may be used to deliver 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 conferencing; or
- (iv) Video cassettes, DVDs, and CD- ROMs, if the cassettes, DVDs, or CD- ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3) of this definition.

2. Regular interaction is defined as –

- (i) being initiated by the instructor, as defined in 600.2,
- (ii) occurring through predictable and regular intervals, and
- (iii) covering the period of time prior to completion of all required assignments and demonstration of competency.

3. Substantive interaction is defined as –

- (i) delivering an academic process, consistent with satisfactory academic progress requirements, as set forth in 34 CFR § 668.34, that engages students in teaching and learning, and
- (ii) providing systematic and continual assessment of student learning outcomes.

**600.2**

*Instructor:* An instructor can include one or more persons employed by the institution, making up an instructional team, so long as this team includes at least one faculty member, as defined by the criteria established by the institution's accrediting agency, who, independently or as a member of an instructional team, must provide regular and substantive interactions to students.

**Commented [LKM1]:** Russ Poulin asks the committee to consider alternative language; widespread use of competency-based education with different interactive models utilizes instructors outside of the more traditional role that was anticipated at the inception of "regular and substantive"