

Information

Regular and Substantive Interaction in Online Courses

Effective

July 1 2020

Applicability

This policy applies to University of Louisville employees and units developing offering and engaging in online programs courses and activities including courses marked Online Synchronous OS Online Asynchronous OA or other comparable designation The University of Louisville offers online courses which fall under the U S Department of Education s definition of distance education and this policy applies to all courses that are subject to the federal requirements for distance education

Administrative Authority

Executive Vice President and University Provost

Responsible Unit

The Delphi Center for Teaching and Learning

502-852-4319

deregs@louisville.edu

History

Policy approved by Beth A. Boehm, Executive Vice President and University Provost.

Revision Date(s): August 2, 2021; August 23, 2021; April 8, 2025

Reviewed Date(s): August 2, 2021; August 23, 2021; April 8, 2025

Categories

Statement:

The University of Louisville (University or UofL) is committed to complying with all requirements regarding the operation of online education within states and U.S. territories. This policy addresses the Department of Education regulations concerning the regular and substantive interaction requirements for online courses.

University online courses must be designed to facilitate regular and substantive interaction between instructors and students. The University requires instructors teaching online courses to have regular and substantive interaction with the students enrolled in those courses.

Training and Resources

The Delphi Center for Teaching and Learning will provide instructional design services and informational documents to assist instructors with course design. Instructors teaching an online course will be sent a notice on annual basis to remind them of this policy and its requirements. Abiding by this policy is considered a condition of work for instructors teaching online courses.

Compliance

Units and employees are expected to comply with this policy when engaging in online courses/programs. Failure to comply could result in disciplinary action of employees, suspension of online courses, and/or financial loss of courses found in violation of this policy. Federal regulations related to online learning were used to guide this policy and any violation of this policy will be taken seriously.

Institutions failing to comply with regular and substantive interaction requirements could potentially lose eligibility for Title IV funds and could be required to return financial aid disbursed for courses found in violation.

Individuals should report violations of this policy to appropriate University leadership, including but not limited to, the Delphi Center for Teaching and Learning at deregs@louisville.edu, the University Integrity and Compliance at compliance@louisville.edu, or the [University's Compliance and Ethics Hotline](#).

Related Information:

Higher Education Opportunity Act, Pub.L. 110-315, 122 Stat. 3078, codified as amended at 34 C.F.R. §600.2.

[Academic Calendar and Awarding of Course Credit Hours Policy](#) - see policy for more information related to regular and substantive interaction in online education

Reasoning:

Per federal law, institutions must ensure that the online courses for which students use federal financial aid have "regular and substantive interaction between students and instructors."

The purpose of this policy is to inform units about the U.S. Department of Education regular and substantive interaction requirements and to eliminate potential university risks associated with violation of these regulations.

Definitions:

Distance Education: The United States Department of Education defines distance education as follows:

(1) 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.

(2) 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 paragraph (2)(i) through (iii) of this definition.

(3) 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.

(4) For purposes of this definition, **substantive interaction** is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes 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.

(5) 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.

Responsibilities:

Instructors teaching online courses are responsible for complying with this policy and its associated federal regulations. Instructors teaching online courses are responsible for ensuring their courses are designed to facilitate regular and substantive interaction between instructors and students. Instructors may consult with the Delphi Center to ensure that their online courses meet the above regular and substantive interaction requirements.

Each department or academic unit is responsible for ensuring instructors who teach online courses in their department comply with this policy and its associated regulations.

The Delphi Center is responsible for creating and maintaining informational resources and trainings, as needed, covering regular and substantive interaction for instructors.