



UTAH VALLEY UNIVERSITY

Policies and Procedures

Proposed Policy Number and Title: 616 Regular and Substantive Interaction		
Current Policy Number and Title: 616 Regular and Substantive Interaction (Temporary)		
Approval Process*		
<input checked="" type="checkbox"/> Regular	<input type="checkbox"/> Temporary	<input type="checkbox"/> Compliance Change
<input checked="" type="checkbox"/> New	<input type="checkbox"/> New	<input type="checkbox"/> New
<input type="checkbox"/> Revision	<input type="checkbox"/> Revision	<input type="checkbox"/> Revision—Limited Scope
<input type="checkbox"/> Revision—Limited Scope	<input type="checkbox"/> Revision—Limited Scope	<input type="checkbox"/> Deletion
<input type="checkbox"/> Deletion		
*See UVU Policy 101 <i>Policy Governing Policies</i> for process details.		

Draft Number and Date:	Stage 3 Regular, May 28, 2025
President's Council Sponsor:	Wayne Vaught
Policy Steward:	Laurie Sharp

POLICY APPROVAL PROCESS DATES		
REGULAR	TEMPORARY	COMPLIANCE
Drafting and Revision Entrance Date: 12/12/2024	Drafting and Revision Entrance Date:	President's Council Approval Approval Date:
University Entities Review Entrance Date: 2/13/2025 Close Feedback: 4/10/2025	Board of Trustees Review Entrance Date: Approval Date:	Board of Trustees Ratification Ratification Date:
Board of Trustees Review Entrance Date: 6/10/25 Approval Date:		



UTAH VALLEY UNIVERSITY

Policies and Procedures

POLICY TITLE	Regular and Substantive Interaction	Policy Number	616
Section	Academics	Approval Date	
Subsection	Instruction and Curriculum	Effective Date	
Responsible Office	Office of the Provost/Senior Vice President of Academic Affairs	Last Review	

1.0 PURPOSE

1.1 This policy addresses the requirements for regular and substantive interaction between instructors and students in distance learning courses in accordance with the United States Department of Education (USDE) and the Northwest Commission on Colleges and Universities (NWCCU).

2.0 REFERENCES

2.1 *Institutional Eligibility Under the Higher Education Act of 1965*, as amended, 34 C.F.R. § 600.2

2.2 NWCCU Policy *Distance Education* (2021)

2.3 Policy 601 *Classroom Management*

2.4 Policy 635 *Faculty Rights and Professional Responsibilities*

3.0 DEFINITIONS

3.1 Regular interaction: ~~Providing substantive interactions with the student on a predictable and scheduled basis commensurate with a course's time length and content in the course or competency; monitoring the student's academic engagement and success; and ensuring an instructor is responsible for promptly and proactively engaging with the student when needed on the basis of this monitoring, or upon request by the student; interaction between a student and an instructor, prior to the student's completion of a course or competency, As outlined in subsections (5)(i) through (ii) of the definition for "distance education" in 34 CFR § 600.2, 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 by~~

3.1.1 ~~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 or competency; and~~



UTAH VALLEY UNIVERSITY

Policies and Procedures

3.1.2 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.-

3.2 Substantive interaction: Engaging students in teaching, learning, and assessment, consistent with the content under discussion, which also includes at least two methods listed under As outlined in subsections (4)(i) through (v) of the definition foref “distance education” inprovided at 34 CFR § 600.2, 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:

3.2.1 Providing direct instruction

3.2.2 Assessing or providing feedback on a student's coursework

3.2.3 Providing information or responding to questions about the content of a course or competency

3.2.4 Facilitating a group discussion regarding the content of a course or competency

3.2.5 Other instructional activities approved by the institution's or program's accrediting agency:-

1) Providing direct instruction;

2) Assessing or providing feedback on a student's coursework;

3) Providing information or responding to questions about the content of a course or competency;

4) Facilitating a group discussion regarding the content of a course or competency; or

5) Other instructional activities approved by the institution's or program's accrediting agency.

3.2.3.3 Distance education: Education that uses one or more of the technologies listedAs outlined in subsections (2)(i) through (iv) of the definition foref “distance education” inprovided at 34 CFR § 600.2, education that uses one or more of the technologies listed 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

3.2.13.3.1 The internet

3.2.23.3.2 One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices



UTAH VALLEY UNIVERSITY

Policies and Procedures

3.2.33.3.3 Audio conference

3.3.4 Other media used in a course in conjunction with any of the technologies listed

~~3.3 to deliver instruction to students who are separated from the instructors and to support regular and substantive interaction between the students and the instructors, either synchronously or asynchronously, via~~

~~1) the Internet;~~

~~2) one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;~~

~~3) audio conference; or~~

~~4) other media used in a course in conjunction with the technologies listed above.~~

3.4 Correspondence course: A course provided by an institution through 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, is not regular and substantive, and is primarily initiated by the student. A correspondence course is not distance education.

4.0 POLICY

4.1 Regular and substantive interaction must occur in all for-credit offerings for which students may use federal financial aid that are delivered at the University via distance education at the University.

4.14.2 Distance education at the University are any scheduling types that meet the definition of 34 C.F.R. § 600.2.(1) fully online or (2) livestream and online modalities.

4.24.3 ~~Distance education courses at UVU do not include correspondence courses.~~ Distance education courses at UVU cannot be correspondence courses.

4.34.4 The Office of Academic Affairs is responsible for ensuring all distance education courses comply with regular and substantive interaction requirements.

~~4.4 The Office of Academic Affairs shall also facilitate the collection and distribution of relevant data and institute a process for schools/colleges to verify compliance with regular and substantive interaction requirements.~~

~~4.5 Deans and department chairs are responsible for verifying that instructors teaching online courses facilitate regular and substantive interaction between instructors and students.~~



UTAH VALLEY UNIVERSITY

Policies and Procedures

4.5 Instructors who design distance education courses are responsible for designing such courses to include regular and substantive interactions. Instructors who teach distance education courses are responsible for engaging in regular and substantive interaction with students in those courses.

4.6 Department chairs are responsible for addressing concerns that arise concerning regular and substantive interaction between instructors and students. Ongoing concerns may be elevated to the dean's office.

4.7 The interactions of instructional assistants, supplemental instructors, and others who are not the instructor of record do not count towards regular and substantive interaction. While the work of instructional assistants, supplemental instructors, and others who are not the instructor of record can contribute to student learning and a positive class environment (or successful class), such interactions do not relieve the instructor of record from their obligation to engage in regular and substantive interaction with students.

5.0 PROCEDURES

5.1 The Office of Academic Affairs will send an annual notice to instructors teaching distance education courses to remind them of this policy and its requirements.

5.2 The Office of Academic Affairs Teaching and Learning shall be responsible for developing and delivering training on (OTL) is responsible for ensuring instructors who design or teach a distance education course are knowledgeable about and can implement will designate responsible units that instructors who design or teach distance education courses provide regular and substantive interactions with students through professional development.

5.3 Disputes about and noncompliance with regular and substantive interaction requirements shall be reported to the Deputy Provost.

5.4 Violation of this e-University's policy to comply with regular and substantive interaction requirements could result in disciplinary action of employees, up to termination of employment, as well as suspension and financial loss of online courses found in violation of this policy. Any disciplinary actions will follow established university policy and procedures. If the University fails to comply with regular and substantive interaction requirements, it could potentially lose eligibility for Title IV funds and could be required to return financial aid disbursed for courses found in violation.



UTAH VALLEY UNIVERSITY

Policies and Procedures

POLICY HISTORY		
Date of Last Formal Review: Click here to enter a date.		
Due Date of Next Review: Click here to enter a date.		
Date of Last Action	Action Taken	Authorizing Entity
	New policy approved in regular process	UVU Board of Trustees

115

*More information on the formal review can be found in Policy 101 section 4.7.3.



UTAH VALLEY UNIVERSITY

Policies and Procedures

Page 7 of 15

POLICY TITLE	Regular and Substantive Interaction (TEMPORARY)	Policy Number	616
Section	Academics	Approval Date	October 28, 2024
Subsection	Instruction and Curriculum	Effective Date	October 28, 2024
Responsible Office	Office the Provost/Senior Vice President of Academic Affairs		

1.0 PURPOSE

~~1.2 UVU is committed to providing quality instruction and engaging experiences to all students, regardless of their learning modality. This policy applies to all for-credit offerings for fully online modalities. This policy addresses the requirements for regular and substantive interaction between instructors and students in distance learning courses in accordance with the United States Department of Education (USDE) and the Northwest Commission on Colleges and Universities (NWCCU).~~

2.0 REFERENCES

- 5 ~~2.5 Institutional Eligibility Under the Higher Education Act of 1965, as amended, 34 CFR §~~
6 ~~600.2~~
- 7 ~~2.6 NWCCU Policy Distance Education (2021)~~
- 8 ~~2.7 Policy 601 Classroom Management~~
- 9 ~~2.8 Policy 635 Faculty Rights and Professional Responsibilities~~

3.0 DEFINITIONS

- 10 ~~3.5 Regular interaction: Providing substantive interactions with the student on a predictable~~
11 ~~and scheduled basis commensurate with a course's time length and content in the course or~~
12 ~~competency; monitoring the student's academic engagement and success; and ensuring an~~
13 ~~instructor is responsible for promptly and proactively engaging with the student when needed on~~
14 ~~the basis of this monitoring, or upon request by the student; interaction between a student and an~~
15 ~~instructor, prior to the student's completion of a course or competency, as outlined in subsections~~
16 ~~(5)(i) through (ii) of the definition of "distance education" provided at 34 CFR § 600.2.~~
- 17 ~~3.6 Substantive interaction: Engaging students in teaching, learning, and assessment, consistent~~
18 ~~with the content under discussion, which also includes at least two methods listed under~~



UTAH VALLEY UNIVERSITY

Policies and Procedures

Page 8 of 15

subsections (4)(i) through (v) of the definition of “distance education” provided at 34 CFR § 600.2:

1) Providing direct instruction;

2) Assessing or providing feedback on a student's coursework;

3) Providing information or responding to questions about the content of a course or competency;

4) Facilitating a group discussion regarding the content of a course or competency; or

5) Other instructional activities approved by the institution's or program's accrediting agency.

3.7 Distance education: Education that uses one or more of the technologies listed in subsections (2)(i) through (iv) of the definition of “distance education” provided at 34 CFR § 600.2, to deliver instruction to students who are separated from the instructors and to support regular and substantive interaction between the students and the instructors, either synchronously or asynchronously:

1) The internet;

2) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;

3) Audio conference; or

4) Other media used in a course in conjunction with the technologies listed above.

4.0 POLICY

4.8 The primary purpose of this policy is to ensure that students completing coursework in an online modality have regular and substantive interactions with their instructor. Regular and substantive interaction ensures that there is sufficient engagement between an instructor and a student. To support this educational objective, the Office of Academic Affairs provides the necessary practices to verify that instructors have regular and substantive interactions with their students.

4.9 The Office of Academic Affairs is responsible for ensuring all courses, for which students may use federal financial aid, offered through distance education incorporate regular and substantive interactions.



UTAH VALLEY UNIVERSITY

Policies and Procedures

Page 9 of 15

~~4.10 The Office of Teaching and Learning (OTL) is responsible for ensuring instructors who design or teach a distance education course in online modalities, are knowledgeable about and can implement regular and substantive interactions through training. OTL is also responsible for verifying that instructors include regular and substantive interaction into the design of distance education courses.~~

~~4.11 Deans and department chairs are responsible for verifying that instructors teaching online courses facilitate regular and substantive interaction between instructors and students.~~

~~4.12 The Office of Academic Affairs shall facilitate the collection and distribution of relevant data and institute a process for schools/colleges to verify compliance with regular and substantive interaction.~~

~~4.13 Instructors who design distance education courses are responsible for designing such courses to include regular and substantive interactions. Instructors who teach distance education courses are responsible for engaging in regular and substantive interaction with students in those courses.~~

~~4.14 Academic leaders are responsible for adhering to the regulatory requirements set forth by the USDE and NWCCU, as well as this policy, to ensure their instructors maintain regular and substantive interactions with students.~~

5.0 PROCEDURES

~~5.5 OTL will provide ongoing training and development for instructors, focusing on course design and ensuring regular and substantive interaction.~~

POLICY HISTORY		
Date of Last Action	Action Taken	Authorizing Entity
October 28, 2024	Temporary policy approved.	President's Council
November 7, 2024	Temporary policy approved.	UVU Board of Trustees



POLICY 616 EXECUTIVE SUMMARY

Policy Number and Title: 616 Regular and Substantive Interaction

Date: February 13, 2025

Sponsor: Wayne Vaught

Steward(s): Laurie Sharp

Policy Process: Regular

Policy Action: New

Policy Office Editor: Cara O’Sullivan

Embedded Attorney: N/A

Issues/Concerns (including fiscal, legal, and compliance impact):

In October 2024, we created the temporary version of this new policy in response to the NWCCU recommendation that to comply with federal law, the University needed to implement a policy that addresses the requirements for regular and substantive interaction between instructors and students in distance learning courses in accordance with the United States Department of Education (USDE) and the Northwest Commission on Colleges and Universities (NWCCU).

Suggested Changes:

N/A

Requested Approval from President’s Council: Entrance to Stage 1

Proposed Drafting Committee: Laurie Sharp, Kat Brown, Justin Atkins, Seth Gurell, Nizhone Mesa, Lakshmi Viswanath

Target Date for Stage 1 Draft to Enter Stage 2: TBD

Target Date for Board of Trustees Review: TBD



UTAH VALLEY UNIVERSITY
Policies and Procedures

Page 11 of 15

EQUITY ASSESSMENT COMMITTEE (EAC) FORM

Policy Number and Title: 616 Regular and Substantive Interaction

Sponsor: Wayne Vaught
Steward(s): Laurie Sharp
EAC Review: January 13, 2025
Owner Review: January 13, 2025

UVU Scope (Groups Impacted):

Adult learners	Pregnancy, pregnancy-related conditions
Age (40+)	Race and ethnicity
Color	Religion, spirituality, and worldviews
First-generation student status	Sex, gender identity, and gender expression
Individuals with apparent or non-apparent disabilities	Sexual orientation
National origin and citizenship status	Socioeconomic status
	Veteran status (including uniformed military status)

Note: This form is for internal use only by the EAC and policy owners (sponsors, stewards, and coordinators). This form captures general equity concerns and those that impact the specific groups listed. This form will accompany the Stage 2 draft.

Section	Groups Impacted	General Equity	Equity Concern	Recommendation	Policy Owner Proposed Solution
			No equity concerns noted.		



UTAH VALLEY UNIVERSITY

Policies and Procedures

SUMMARY OF COMMENTS (STAGE 2)			
Policy Number and Title: 616 Regular and Substantive Interaction			
Sponsor:	Wayne Vaught		
Steward(s):	Laurie Sharp		
UVUSA	Academic Affairs Council	Faculty Senate	PACE
Date Presented: _____	Date Presented: <u>3/13/2025</u>	Date Presented: <u>3/10/25</u>	Date Presented: <u>4/14/25</u>

Note: Indicate with X whether the comment is editorial (grammar, punctuation, sentence structure) or is a substance comment (content, procedure, etc.)

Campus Entity	Policy Section	Editorial Comment	Substance Comment	Concern	Sponsor/Steward Response
Faculty Senate	4.4- 4.5		x	Clearly define how RSI will be measured and who will verify compliance. How do we measure Canvas Announcements and other features or apps (real time interaction vs pre planned).	A procedure distinct from the policy will be developed through engagement with the Academic Affairs Council and Faculty Senate.
Faculty Senate	4.4- 4.5		X	Shift responsibility for evaluation from a top-down approach to a department-level review.	A procedure distinct from the policy will be developed through engagement with the Academic Affairs Council and Faculty Senate.



UTAH VALLEY UNIVERSITY

Policies and Procedures

Page 13 of 15

Faculty Senate	4.4- 4.5		x	<p>Specify whether Canvas is required for tracking RSI and, if so, how other forms of communication and engagement (grading feedback, email, discussions) will be incorporated. If Canvas is not required, then how can we write a policy outlining RSI that centers on Canvas.</p> <p>Whatever is required make sure that it is thorough—beyond counts and more on effort put forth. Make requirements clear for success. Warning: Canvas measurements may be forcing everyone to teach in a specific way. What about Hybrid classes, or in-person office hours?</p> <p>Faculty need to be involved in measurement creation—and consulted for regular oversight on use and application of measurement.</p>	<p>A procedure distinct from the policy will be developed through engagement with the Academic Affairs Council and Faculty Senate.</p>
Faculty Senate	4.4- 4.5		x	<p>Ensure transparency regarding how RSI data may be used, particularly in disciplinary contexts, to prevent misuse of monitoring tools.</p>	<p>A procedure distinct from the policy will be developed through engagement with the Academic Affairs Council and Faculty Senate.</p>
AAC	3.1		x	<p>I think a quote directly from CFR 600.2 would be clearer than this attempt to rewrite it. This version has an inconsistent voice. Additionally, the meaning may not be the</p>	<p>In 3.1, the definition was changed to include a direct quote from federal regulations.</p>



UTAH VALLEY UNIVERSITY

Policies and Procedures

				same in this rewrite. For example, opportunity was omitted in the rewrite and serves an important purpose in the definition.	
AAC	3.2			think the relevant section of CFR 600.2 is clearer than this section. I think a quote would be easier to read.	In 3.2, the definition was changed to include a direct quote from federal regulations.
AAC	3.3			I think the relevant section of CFR 600.2 is clearer than this section. I think a quote would be easier to read.	In 3.4, the definition was changed to include a direct quote from federal regulations.
AAC	4.1			Are livestream courses at risk of not having regular and substantive interaction? I wouldn't think so. I am not sure about their inclusion here or why it lists "livestream and online modalities" together.	Per federal regulation, livestream is encompassed within the definition of distance education.
AAC	4.2			I think it would be more accurate to say that "Distance education courses at UVU cannot be correspondence courses."	This wording change was made.
AAC	4.4			This needs to be more than monitoring whether a faculty member logs in to their courses.	Agreed. a procedure will be developed outside the policy and will be published/made known to faculty.
AAC	4.5			<p>What authority is given to deans and department chairs to do this? Do they automatically have access to online courses or must they get approval on a case-by-case basis?</p> <p>If deans and department chairs need to address concerns it is one thing. Such a review could be initiated by students, colleagues, or software that monitors Canvas. It is another thing entirely to be actively monitoring all of the online courses in a department or college. This would be</p>	4.5 was changed to: Deans and department chairs are responsible for addressing concerns that arise concerning regular and substantive interaction between instructors and students.



UTAH VALLEY UNIVERSITY

Policies and Procedures

				unworkable. More clarity is needed in this section.	
AAC	4.7			I think it is worth acknowledging that these other individuals contribute to student success and course success. Something like the following, “While the work of instructional assistants, supplemental instructors, and others who are not the instructor of record can contribute to student learning and a positive class environment (or successful class), such interactions do not relieve the instructor of record from their obligation to engage in regular and substantive interaction with students.”	This is now 4.6, and the wording was changed to this suggestion.
AAC	5.4			This could be more direct, “Violation of this policy could result in disciplinary action...”	The beginning of 5.4 was changed to this suggestion.
PACE				No comments.	N/A
UVUSA				No comments were submitted.	N/A