



Delivery Modality and Regular and Substantive Interaction Policy

Policy/Procedure Owner	Academic Affairs
Policy/Procedure Approver(s)	VPAA's, with consultation from University Academic Council; Ed Standards, SGPP Policy Committee
Related Policies	Guidelines for Synchronous Session in Online Courses
Related Procedures	
Storage Location	UAC Academic Policy/Procedures Library - UAC Shared Google drive
Effective Date	July 1 st , 2025
Next Review Date	(reviewed every two years)

Purpose

This document updates policy on delivery modalities and establishes policy and operational practice expectations for regular and substantive interaction in distance education. Additionally, a translation of terminology is provided at the end for use in marketing programs, in university academic catalogs, and in conversations with prospective students and current students.

Scope

This covers both academic units (College and SGPP), all programs, and all locations where programs are offered.

General Information

Definitions provided below are primarily taken from regulatory agencies, including the Higher Learning Commission (HLC) and the Department of Education (DOE). While this terminology is not always used in marketing and/or in explanations with students, it must align for reporting purposes. If different terminology is used for marketing, appropriate transparency must be

utilized with prospective students (who may choose the university and/or program based on delivery modality availability) and with current students (who have expectations based on what they were told at time of admission).

Program Delivery and Distance Education

The federal government and the institution's accreditor, the Higher Learning Commission (HLC), defines an academic program, in part, by where and how instruction is taking place (location and modality, respectively). Program delivery modality and location are highly regulated and require internal and external oversight and approval in order to ensure students' access to federal financial aid. As such, Saint Mary's is required to have in place policies that ensure consistency and transparency in program and course delivery modality and which also support external reporting as required by law. For these reasons, explaining how distance education is defined at the federal level and by HLC is being done to provide the basis for Saint Mary's internal policies and practices.

Distance Education (HLC definition; based on federal definition from DOE)

Education that uses one or more of the technologies 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:

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 any of the technologies listed in items 1–3 above.

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

Distance Education Course (HLC definition)

A course 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 (HLC definition)

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

HLC does not provide definitions for the terms “online”, “hybrid” or “blended”.

Saint Mary’s Delivery Modalities

Saint Mary’s offers the following delivery modalities for academic programs:

In-person - 100% of the instruction and interaction takes place when the instructor and students are physically present in the same location, such as a classroom. Both the instructor and students meet on a regular, scheduled basis, allowing for direct, in-person interaction.

Online - 100% of the instruction and interaction is delivered using distance education technologies. Most often, all instruction and interaction within an online program is asynchronous, depending on the program’s design, but may include required synchronous meetings.

Hybrid - Instruction and interaction is delivered using a combination of distance education technologies and in classroom meetings, when the instructor and students are in the same location. This modality is sometimes referred to internally at Saint Mary’s as “blended”.

Program modalities are reviewed and approved by the respective Education/Academic Policy Committees and Curriculum Committees at the College and SGPP, with policies posted in the academic catalogs.

Saint Mary’s offers courses utilizing the three delivery modalities above as well; the terminology indicated above for programs can be applied at the course level.

Additional information

Online programs are generally designed for students to participate asynchronously. However, some online programs utilize synchronous components in course delivery.

- Asynchronous program or course delivery allows students to engage in each class at any time of day. It is especially appropriate for working adults who need increased flexibility in their schedules, and students who are located in different time zones from the instructor, such as international students.
- Asynchronous courses typically rely on tools such as pre-recorded instructor lecture modules, videos, webinars, discussion forums or boards, simulations, etc. Regular and substantive interaction should occur weekly during the course.
- An asynchronous course can be self-paced, but can also have weekly deadlines.
- All courses in online programs are coded as “online” at Saint Mary’s.
- Limited use of synchronous sessions may occur based on pedagogical needs and to enhance student learning (for Synchronous Sessions in Online Courses).

Hybrid programs utilize a combination of in-person and distance education technologies to deliver instruction. This requires the institution to understand the degree or amount of “blending” (in-person vs. distance education) in a program and in a specific course. The following scale is used to determine the percent of instruction delivered through distance education within a hybrid program as a whole, and/or within a specific hybrid course:

Low	1-24% Distant/online instruction
Medium	25-49% Distant/online instruction
High	50-74% Distant/online instruction

The level of “blend” for each hybrid program is maintained by the Senior Director of Curriculum and Instruction. For courses, the level of blend is recorded by the registrar in the student information system. Decisions regarding the delivery method for a program are determined by the VPAA in partnership with the Associate Dean/Dean and program director/chair. Decisions regarding the level of blending for a course is determined by the program director in partnership with the Senior Director of Curriculum and Instruction.

Regular and Substantive Interaction (RSI)

Regular and Substantive Interaction (RSI) in distance education refers to meaningful and consistent engagement between students and their instructors and the educational content. These interactions are critical to fostering high-quality learning, requiring instructors to actively engage with students in a meaningful manner, ensuring consistent, tailored support that aligns with the course content and outcomes. This ensures that the instructor is actively present and encourages students to move beyond passive absorption of information to active participation in the learning process.

The U.S. Department of Education now requires that all online courses for which students may use Title IV funds (federal financial aid) ensure that there is regular and substantive interaction between students and faculty. Aligned with the federal definition, the Higher Learning Commission (HLC) also mandates that institutions ensure “regular and substantive interaction” in distance education. HLC further details expectations for both regular and substantive engagement to promote meaningful instructor-student interaction.

Regular Interaction: An institution ensures regular interaction between a student and an instructor or instructors, prior to the student’s completion of a course or competency, by:

1. Providing the opportunity for regular 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
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.

Substantive Interaction: 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:

1. Providing direct instruction via a synchronous session;
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 HLC or the program’s accrediting agency.

RSI Additional Information

Substantial instruction/interaction should occur weekly during each course (whether online or hybrid). During scheduled online weeks, instruction should include one of the following:

- Student-to-student learning activities (examples: discussion board, online group projects, peer review of work with guidelines from the instructor);
- Instructor-to-student instruction interaction (examples: online instructor lecture module, feedback on work, scheduled online student consultations);
- Student-to-interactive content (example: the Library's eBrarian modules, proctored examinations).

An individual reading, assignment, or activity provided as homework without an accompanying exchange of ideas within the class should not be the only activity in which a student is engaged during an online week.

Syllabi for online or hybrid courses with synchronous components should make clear the meeting dates and times required for synchronous meetings, and must align with what was shared with students in the course schedule.

Syllabi for hybrid courses should make clear in-person meeting dates and times, which weeks are online, and what the expectations are for engagement during the online weeks.

A minimum of one hour of online office time must be scheduled weekly for asynchronous online courses. Online office hours represent scheduled times when an instructor is available via video technology (Zoom, Google Meets, or similar) to answer student questions or discuss course topics. The days and times of weekly online office hours must be listed in the syllabus and Canvas so that students are aware of the schedule at the start of the course. Instructors teaching online courses with a combination of synchronous and asynchronous online sessions are also encouraged to schedule online office hours.

Referencing Delivery Modalities Translation - Internal and External

Saint Mary's understands the need to "translate" the program and course modality terminology for employees, prospective students (on our website and in our marketing materials) and current students. Prospective students often select Saint Mary's based on the program delivery modality, particularly now that many students are not located close to our physical campuses. Therefore, the requirement to be transparent in our marketing (materials and website) and recruitment efforts is paramount. Below is the translation that can be used with different constituencies.

Program consists of	What we call the program <i>internally</i>	What we tell regulators	What we tell the public, including prospective students (marketing & website)	What we tell current students
All in person courses	In-person or on-ground	On ground or on campus	In-person with campus location	In-person with campus location
Online courses, all asynchronous	Online	Distance education	Online	Online
Online courses, with some required synchronous courses/components	Online	Distance education	Online with explanation of required synchronous courses/components	Online with explanation of required synchronous courses/components
Hybrid - some in-person and some distance education courses	Hybrid or Blended	Distance education or on ground, depending on %	Hybrid with explanation Online with in-person residency, if applicable	Hybrid with explanation Online with in-person residency, if applicable

Revision History

Date	Who	Changes
June 19 th , 2025	VPAAAs and UAC	Policy developed and approved.
June 18 th , 2026	VPAAAs and UAC	Policy edited - More clarification regarding the regular scheduled office hours verbiage was added; some additional writing mechanics and wording edits were made.