Federal regulation mandates that federal financial aid funds (Title IV) may only be disbursed to students who have begun attendance/participation/engagement in each class the student is enrolled for each semester. This regulation mandates that institutions document attendance/participation/engagement. Failure to document attendance/participation/engagement may result in sizeable fees and fines to the University.

To comply with this mandate, all instructors of undergraduate and graduate courses (including lab courses, independent studies, online courses, and research credit) will be required to confirm students begin attendance/participation/engagement in classes during the two-week period following the last day to add a class.

Frequently Asked Questions:

1. **What constitutes verification of engagement?**

   In a traditional class, verifying attendance in class or submitting a quiz, homework or some other assignment is sufficient for verification of engagement.

   For online classes, instructors should verify engagement by requiring the students to submit an assignment. Simply logging into the online site does not constitute attendance/participation/engagement for verification purposes.

   For independent study classes (for graduate or undergraduate students), the faculty member should confirm that there is some record of interaction with the student during the confirmation period. This may be face-to-face meeting or a documented interaction (paper, email, substantial online interaction, or some type of submission by the student). Submission of a plan of study would count if this did not already occur prior to the start of the semester.

   For research and residency credit courses for graduate students (i.e. 748, 749, 767, and 767 courses), participation in research in the lab or some other contact with you as the research advisor can be used to verify engagement.

2. **When will I submit verification of attendance or participation?**

   The first week following the last day to add a course will be the monitoring period when instructors must confirm attendance or engagement. The second week following the last day to add a course will be the reporting period.

   If the class does not meet the first week following the add date, then both monitoring and reporting can occur during the second week.

   (For fall semester, 2018, the last day to add a course is Aug 28. For spring semester, 2019, the last day to add a course is Jan 15.)

3. **Do I have to monitor the engagement/attendance the entire week?**
No, you only have to verify attendance/participation/engagement once.

4. **What happens if a student was attending class and engaged prior to the last date to add a class but for some reason, was not able to attend class during the monitoring period?**

This is ok. Evidence of attendance/participation/engagement prior to the monitoring period will count.

5. **What happens if a student has an absence (excused or unexcused) for the day attendance is taken?**

If the student has otherwise demonstrated engagement in the course (such as with an assignment), or if the student has substantive interaction (such as a face-to-face meeting), then the instructor may certify that the student has been engaged in the course.

6. **Will I receive a reminder about the need to verify attendance or engagement?**

Yes. A verification prompt will be initiated after the last day to add has passed.

7. **How will I report attendance or engagement?**

The University is establishing a process for this. Further information will be provided to instructors at a later date.

8. **Can I notify students that attendance will be taken, and absences or failure to submit an assignment may result in them being dropped from the course?**

Yes, we suggest that you do notify the students. For example, you could add the following to your syllabus: “In order to meet federal regulations, the instructor will monitor student participation in this class through attendance or assignments. Students whose attendance/participation/engagement cannot be determined one time during the first three weeks of the semester may be dropped from the course. If you will be missing a class period or will not be submitting some assignment during that period, it is your responsibility to notify the instructor, even if the absence or missed assignment is not excused under university rules.”

9. **What happens after I submit a student for non-attendance?**

The student will be dropped from the course in SAP and Canvas will be updated accordingly. The Academic Communication Tool (ACT) will be utilized to push email notifications to students, faculty and advisors once a student is dropped. Federal funds will not be disbursed for those credit hours. The drop will result in a 50% refund to the student and courses dropped for non-attendance/non-participation/non-engagement will not appear on the student’s transcript. The student may seek relief through the tuition appeals process, if they are unfairly/adversely impacted by the new attendance/participation/engagement requirements and forced withdrawal from a class.

10. **What happens if a student was incorrectly dropped from my course?**
The student must communicate with the instructor to be reinstated. The instructor of record will notify the Office of the Registrar and the student will be reinstated.

11. I have a lab class that will not meet prior to the verification period. What should I do?

Verification is still required for these courses. You should verify engagement by asking the students to submit an online assignment (through Canvas) or schedule a brief required orientation before or during the verification period.

Questions from Faculty

1. What would happen in the case that a student attends the first day (or two) of class but then is absent and doesn’t turn in homework since that date? Is it a judgement call for the faculty or is engagement strictly having completed at least one thing once?

Answer: A student that attends the first day (or two) of class should be considered as attending/engaged/participating. In some cases, attendance/engagement/participation will be a judgement call to the extent engagement in academically related activities can be determined.

2. I have had a few students not attend a class yet they turn in homework assignments because they are available on Canvas. So if I used an initial homework assignment to verify enrollment would that student be confirmed as being enrolled and not dropped? These students usually end up dropping the class later or failing altogether. Would something like this put us at risk for being considered non-compliant with the mandate?

Answer: No

3. I have one simple question – currently, we are supposed to drop students who miss the first two class meetings (USR 5.1.8.1). I assume that we will continue to do this and those dropped students would be included in the non-attendance report.

Answer: Under Senate Rules, faculty may still do this.

Senate Rule 5.1.8.1: Unilateral Removal for Failure to Attend First Two Class Periods. Students who miss the first two class periods of a course without notifying the department of their intention to attend may be reported by the department to the dean who shall remove the students from the class role and notify the Registrar that the student has been removed from the class roll. The Registrar will inform such students that they have been removed. The students will have no record of the class appear on their transcripts.