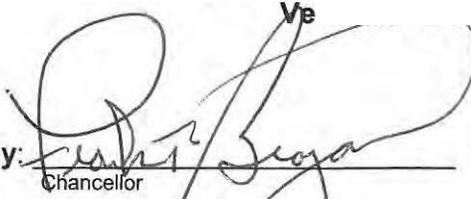


**Office of the Chancellor
Pennsylvania's State System of Higher Education**

Procedures and Standards for University Operations

Procedure/Standard Number 2016-27 Verification of Attendance

Approved by:  Chancellor ^{Ve} Date: 8/31/16

History: The administration of federal student aid under Title IV of the Higher Education Act of 1965, as amended, requires universities to determine whether or not financial aid must be returned for Title IV recipients who withdrew during the term. Proper calculation for the return of Title IV funds (R2T4) is dependent upon verifying attendance in academically related activities. **Revised:**

Additional History:

Related Policies, Procedures or Standards: N/A

Key Words/Categories: Academic, Faculty, Finance, Scholarships and Waivers, Students

Additional References: United States (U.S.) [Federal Student Aid Handbook, Volume 5: Withdrawals and the Return of Title IV Funds; R2T4 At A Glance Worksheet Definitions \(Withdrawal Date\)](#). *Note: The Background and Definitions sections below are based on language taken from the Federal Student Aid Handbook (FSA).*

I. Background: Federal Requirements for Verification of Attendance

Federal student aid, under Title IV of the Higher Education Act of 1965, as amended, is awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded. When a student withdraws, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive. If a recipient of Title IV grant or loan funds withdraws from a school after beginning attendance, the amount of Title IV grant or loan assistance earned by the student must be determined based on the student's withdrawal date. (FSA 5-4)

A university is required to determine the earned and unearned portions of Title IV aid as of the date the student ceased attendance based on the amount of time the student spent in attendance or, in the case of a clock-hour program, was scheduled to be in attendance. Up through the 60 percent point in each payment period or period of enrollment, a pro rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60 percent point in the payment period or period of enrollment, a student has earned 100 percent of the Title IV funds he/she was scheduled to receive during the period. (FSA 5-3)

A university must develop a mechanism for determining whether a Title IV recipient who began attendance unofficially withdrew (ceased attending academically related activities). If a student who began attendance and did not officially withdraw fails to earn a passing grade in at least one course, the institution must assume the student has unofficially withdrawn, unless the institution can document otherwise. (FSA 5-56)

II. Definitions

A. **Withdrawal-To** cease attendance in all Title IV eligible classes in a payment period or period of attendance, as applicable. A student is considered to have withdrawn from a payment period or period of enrollment if, in the case of a program that is measured in credit hours, the student does not complete all the days in the payment period or period of enrollment that the student was scheduled to complete. (FSAA-75)

1. **Official Withdrawal Date-If** a student provides written or oral notification of withdrawal to the university's designated office stating intent to withdraw, the withdrawal date is the date the university receives the notification. (FSA 5-52)
2. **Unofficial Withdrawal Date-In** general, if a student leaves the university without the provision of official notification, the withdrawal date is the midpoint of the payment period or period of enrollment, as applicable, or the last date of an academically related activity in which the student participated. (FSA 5-53)

B. **Academically Related Activity** (FSA 5-59)

1. Academically related activities include, but are not limited to:
 - a. Physically attending a class where there is an opportunity for direct interaction between the instructor and students.
 - b. Submitting an academic assignment.
 - c. Taking an exam, an interactive tutorial, or computer-assisted instruction.
 - d. Attending a study group that is assigned by the university.
 - e. Participating in an online discussion about academic matters.

- f. Initiating contact with a faculty member to ask a question about the academic subject studied in the course.
2. Academically related activities do **not** include activities where a student maybe present but not academically engaged, such as:
 - a. Living in institutional housing.
 - b. Participating in the university's meal plan.
 - c. Logging into an online class without active participation.
 - d. Participating in academic counseling or advisement.
- C. **Academically Related Activity for Distance Education Courses (FSA 5-60)**- In a distance education context, documenting that a student has logged into an online class is not sufficient, by itself, to demonstrate academic attendance by the student. A school must demonstrate that a student participated in class or was otherwise engaged in an academically related activity. Academically related activities in a distance education course include, but are not limited to:
1. Student submission of an academic assignment.
 2. Student submission of an exam
 3. Documented student participation in an interactive tutorial or computer-assisted instruction.
 4. A posting by the student showing the student's participation in an online studygroup that is assigned by the institution.
 5. A posting by the student in a discussion forum showing the student's participation in an online discussion about academic matters.
 6. An email from the student or other documentation showing the student initiated contact with a faculty member to ask a question about the academic subject studied in the course.
- D. **Failing Grade, Earned-Grade** awarded to students who generally completed the course period but failed to achieve the course objectives. It is used when, in the opinion of the instructor, completed assignments or course activities or both were sufficient to make normal evaluation of academic performance possible. (FSA 5-57)
- E. **Failing Grade, Unearned-Grade** awarded to students who did not officially withdraw from the course, but who failed to participate in course activities through the end of the period. It is used when, in the opinion of the instructor, completed assignments or course activities or both were insufficient to make normal evaluation of academic performance possible. (FSA 5-57)

III. Procedure for Verification of Attendance

Each State System university shall develop a policy that ensures verification of class attendance or participation in other academically related activities for purposes of the return of Title IV funds. Each university policy must meet the following minimum requirements.

- A. The instructor of record must verify course rosters for census purposes at the end of the add/drop period. Verification of course rosters affirms that the students listed have been involved in academically related activities associated with the course. For online courses, the faculty member shall advise students to log into the course and begin course activity during the add/drop period.

 - B. The university must utilize in its grading system an earned failing grade and an unearned failing grade. For failing grades, the instructor of record must determine if the failure was based on performance or nonperformance, and submit the appropriate grade.

 - C. Require a second verification of the course roster for census purposes at the course midpoint or 60 percent point, and/or require the faculty member to provide the last known date of academically related participation if the student receives an unearned failing grade.
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IUP NEW POLICY – FOR ACTION

POLICY STATEMENT

Subject: Verification of Participation in Academically Related Activities Policy		
Date: XXX 2017	Distribution Code:	Reference No:
Addition Deletion <input checked="" type="checkbox"/> New Item Revision	Originating Offices: <input checked="" type="checkbox"/> Registrar – primary point of contact <input checked="" type="checkbox"/> Financial Aid <input checked="" type="checkbox"/> Bursar	

Purpose

This policy formalizes how IUP will determine the earned and unearned portions of federal Title IV student aid funds, which is required under Title IV of the Higher Education Act of 1965, as amended. Up through the 60 percent point in each payment period or period of enrollment, a pro rata schedule is used to determine the amount of earned Title IV aid. After the 60 percent point, a student has earned 100 percent of the Title IV aid funds he/she was scheduled to receive during the period. If a student unofficially withdraws (ceases to participate in academically related activities), the university must determine that date.

Scope

All students shall engage in academically related activities in order to be eligible for federal (Title IV) student aid. All instructors of record shall verify their course rosters at designated times during each semester for such activity. This information will assist IUP personnel in Financial Aid and Bursar with the calculations of aid that may be awarded and/or returned.

Definitions

- A. **Withdrawal** – To cease attendance in all Title IV eligible classes in a payment period or period of attendance, as applicable. A student is considered to have withdrawn from a payment period or period of enrollment if, in the case of a program that is measured in credit hours, the student does not complete all the days in the payment period or period of enrollment that the student was scheduled to complete.
1. **Official Withdrawal Date** – If a student provides written or oral notification of withdrawal to the university's designated office stating intent to withdraw, the withdrawal date is the date the university receives the notification.
 2. **Unofficial Withdrawal Date** – In general, if a student leaves the university without the provision of official notification, the withdrawal date is the midpoint of the payment period or period of enrollment, as applicable, or the last known date of an academically related activity in which the student participated.
- B. **Academically Related Activity**
1. Academically related activities include, but are not limited to:
 - a. Physically attending a class where there is an opportunity for direct interaction between the instructor and students.
 - b. Submitting an academic assignment.
 - c. Taking an exam, an interactive tutorial, or computer-assisted instruction.
 - d. Attending a study group that is assigned by the university.
 - e. Participating in an online discussion about academic matters.
 - f. Initiating contact with a faculty member to ask a question about the academic subject studied in the course.
 2. Academically related activities do **not** include activities where a student may be present but not academically engaged, such as:
 - a. Living in institutional housing.
 - b. Participating in the university's meal plan.
 - c. Logging into an online class without active participation.
 - d. Participating in academic counseling or advisement.
- C. **Academically Related Activity for Distance Education Courses** – In a distance education context, documenting that a student has logged into an online class is not sufficient, by itself, to demonstrate academic attendance by the student. A school must demonstrate that a student participated in class or was otherwise engaged in an academically related activity. Academically related activities in a distance education course include, but are not limited to:
1. Student submission of an academic assignment.
 2. Student submission of an exam.
 3. Documented student participation in an interactive tutorial or computer-assisted instruction.

4. A posting by the student showing the student's participation in an online study group that is assigned by the institution.
 5. A posting by the student in a discussion forum showing the student's participation in an online discussion about academic matters.
 6. An email from the student or other documentation showing the student initiated contact with a faculty member to ask a question about the academic subject studied in the course.
- D. **Failing Grade, Earned** – Grade awarded to students who generally completed the course period but failed to achieve the course objectives. It is used when, in the opinion of the instructor, completed assignments or course activities or both were sufficient to make normal evaluation of academic performance possible (instructor will record a grade of “F”).
- E. **Failing Grade, Unearned** – Grade awarded to students who did not officially withdraw from the course, but who failed to participate in course activities through the end of the period. It is used when, in the opinion of the instructor, completed assignments or course activities or both were insufficient to make normal evaluation of academic performance possible (instructor will record a grade of “N”, along with the last known date of participation in academically related activities.)

Procedure

All instructors of record must verify in the student system that students on their course rosters have participated in academically related activities immediately after the drop/add period, when mid-term grades are recorded, and when final grades are submitted.

Immediately after drop/add, verification of course rosters affirms that the students listed have been involved in academically related activities associated with the course. For online courses, the faculty member shall advise students to log into the course and begin course activity during the add/drop period.

Mid-term and final grades must be recorded in the student system for all students with earned and unearned failing grades. Instructors must determine if the failure was based on performance (“F”) or non-participation (“N”), respectively, and must also record the last known date of participation in academically related activities if the student receives an unearned failing grade (“N”).

Roles and Responsibilities

Students will be responsible for engaging in academically related activities in their courses. Instructors will record participation at the end of the drop/add period. For students failing the course at mid-term and/or finals, instructors will record whether or not the failing grade was due to performance or non-performance (earned or unearned). If the failure was due to nonparticipation, the last known date of the student’s participation in academically related activities will be reported. IUP personnel in Financial Aid and the Bursar will use the recorded

information to determine the amount of Title IV student aid that will ~~may~~ be awarded and/or returned.

Guidelines

For more information about specific guidelines, consult the University Catalogs (undergraduate and graduate) at <https://www.iup.edu/registrar/> or <https://www.iup.edu/graduatestudies/catalog/>.

Rescission

Not applicable.

Publication and Distribution Statement

This policy will be distributed directly to all IUP students, faculty and applicable administrative offices at least once per academic year. It will also be included in the mid-term and final grade instructions distributed by the Registrar's Office as well as incorporated in the University Catalogs.

Distribution

Code Description

- A All Faculty
- All Students
- All Applicable Administrative Offices