



DRAFT POLICY

POLICY APPROVAL TEMPLATE

Instructions: Complete each field with information that pertains to the policy you are proposing. Overwrite or delete all of the guidance in each field before submitting for review. If the field does not apply, leave blank, or list "N/A" to mean Not Applicable.

Policy Name	Verification of Enrollment and Attendance
Policy Category	Academic
Policy Approved By	President
Responsible Division Head or VP	Provost
Responsible Department	Academic Affairs
Responsible AVP or Director	Registrar
Original Policy Date	4/11/2022
Last Known Revision Date	n/a
Current Policy Effective Date	Click or tap to enter a date.
Recommended Policy Review Date	
Policy Applies To	Faculty
Additional Authority/References	Title IV Federal Aid Policies

POLICY PURPOSE

This policy serves two purposes:

1. To ensure Albright College is in compliance with Title IV Federal Aid policies on verifying attendance prior to disbursement of aid. Failure to be in compliance can lead to consequences up to the revoking of Title IV funding from the institution.
2. To ensure Albright College can confirm enrollment of all students for an academic semester; to assist with retention efforts and general recording keeping. Specifically, failure to have an accurate headcount for students has broad reaching effects, including distributing loans to students who are no longer attending the institution.

BACKGROUND

Albright College did not previously have a policy to require attendance verification in all courses for the first two weeks of a regular semester. This is needed to support retention efforts and to ensure we remain in compliance with Title IV regulations.

For the Federal Pell Grant, the school must document that the student was enrolled or scheduled to be enrolled (i.e., registered) in the coursework on which the student's enrollment status is based. The school also must document that the student began attendance in **all** classes that contributed to the enrollment status of that student. For example, an institution disburses a Pell Grant based on a student's half-time enrollment status. The institution defines half-time as six credits. The institution must document actual attendance in classes that comprise at least six credits in order to demonstrate the student established eligibility for six credits worth of Pell.

If the student does not begin attendance in all of the classes in which he or she was enrolled, the school must recalculate the student's Pell Grant, based on the revised enrollment status. In the above example, if the student was enrolled in six credits, but began attendance in only three of those credits, the Pell Grant must be recalculated based on three credits (i.e., less-than-half-time enrollment). This recalculation always is required, regardless of whether the school has a Pell recalculation date (PRD)—also called a "census" date or "freeze" date. The same is true when there are modules, or identified, divided sections, in the payment period; the student must begin attendance in all modules, or recalculation of the Pell Grant is required, even after the PRD. The student must return any Pell Grant funds disbursed for which he or she was ineligible.

For the Direct Loan Program, the school must document that the student was enrolled or scheduled to be enrolled (i.e., registered) at least half time when the loan funds were disbursed. The school also must document the student established eligibility for the first disbursement of the Direct Loan by beginning attendance in at least one class. If not, then the school must return any Direct Loan funds credited to the student's account. For any funds disbursed directly to the student, the school must notify the loan servicer so a 30-day demand letter will be sent to the student. Note that a student who began attendance—but on a less-than-half-time basis—remains eligible for the loan disbursement made while scheduled to attend at least half time, and has agreed to repay the loan funds according to the terms and conditions of the Master Promissory Note (MPN); however, any subsequent disbursements must be cancelled unless the student returns to at least half-time status. This is the case unless the student withdraws from all classes during the payment period, meaning the academic term, *after* beginning attendance in at least one class, in which case any return of loan funds is determined according to the return of Title IV funds (R2T4) calculation instead.

For Federal Supplemental Educational Opportunity Grant (FSEOG) and Federal Work-Study (FWS), the school must document that the student was enrolled or scheduled to be enrolled (i.e., registered) in the coursework on which the student's enrollment status is based. The school also must document that the student established eligibility by beginning attendance in at least one class. If the student's cost of attendance (COA) changes, you have to recalculate eligibility for campus-based funds using the revised COA.

For all of the Title IV programs, if the student does not begin attendance in **all** classes for the payment period, meaning the academic term, **all** aid from all of the Title IV programs must be returned to the applicable program. In this case, the student never established Title IV eligibility.

When a student earns a passing grade in a course, that grade is sufficient to indicate the student began attendance. The absence of a passing grade can pose a challenge for an institution to obtain the necessary documentation to show a student established eligibility. This can occur when, for example, a student receives a grade of "F", a withdrawal, an incomplete, or a drop. The institution must have a process in place to collect or obtain alternative documentation to demonstrate a student established eligibility by beginning attendance.

References: [34 CFR 668.164\(b\)\(3\)](#); *FSA Handbook*, Volume 4, Chapters 2 and 3; *FSA Handbook*, Volume 3, Chapters 3 and 7.

DEFINITIONS

TERM	DEFINITION
Title IV	Portion of the Higher Education Act of 1965 the covers the administration of the federal financial aid program. Authorizes a broad array of programs and provisions to assist students and their families in gaining access to and financing a postsecondary education. Programs authorized under this title are the primary sources of federal aid supporting postsecondary education. Albright College must remain in compliance with these regulations to disburse financial aid.

POLICY TEXT

Albright College recognizes the importance of class attendance during the first two weeks of the semester and the impact this has on continuing success in a course. In addition, knowing which students are currently in attendance at the institution is vital to our continued retention and student success efforts. Finally, to ensure Albright College is in compliance with Title IV federal aid policies, student enrollment must be verified prior to the disbursement of aid.

For these reasons, instructors in all courses will be required to keep attendance records for each class meeting during the first two weeks of a semester or the equivalent, as determined by the Registrar, for a term of different length, such as Summer.

Instructors will record student attendance using the primary means of recording attendance in use at the College.

ASSOCIATED PROCEDURES LOCATION

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REVISION LOG

DATE OF REVISION	MAJOR CHANGES <i>(Note: electronic copies of the former versions of the policy must be maintained within the unit, department, or division)</i>
Click or tap to enter a date.	
Click or tap to enter a date.	
Click or tap to enter a date.	
Click or tap to enter a date.	
Click or tap to enter a date.	

IMPLEMENTATION PLAN - For decision-making purposes only. This will not appear in the Final Policy that is posted to the Policy Repository.

This section lays out the intended Communication Plan and Process Steps that will be used to implement this process each semester.

1. Communication Plan
 - a. Email from Provost to teaching faculty describing the compliance requirement and implications of non-compliance will occur one week prior to the start of the term.
 - b. Email from Faculty Chair to teaching faculty launching the effort will occur during the first day of the term.

- c. Email from Registrar to teaching faculty reminding them of effort will occur during the start of the second week of classes or its equivalent in terms of differing lengths.
 - d. Email from Registrar to teaching faculty reminding them again of effort will occur the day after the add/drop deadline.
2. Process
- a. All Courses will have the attendance feature turned on in Canvas by the Director of Student Academic Success.
 - b. All Faculty in both the Day Program and the School of Professional Studies will take attendance in Canvas during the first 10 days of the semester.
 - c. All Faculty in both the Day Program and the School of Professional Studies will initiate an Aviso staff alert of one of the following types at the conclusion of the first 10 days of the semester for applicable students.
 - i. Student Stopped Attending, adding the day they last attended.
 - ii. Student Never Attended
 - d. Action Retention Committee (ARC) members (Directors of Residential Life, Financial Aid, Student Accounts, Student Success, Registrar, Assistant Provost, and other relevant members) will receive the alert and follow-up where needed.
 - i. ARC will determine if lack of attendance is an unofficial withdrawal from a course or courses.
 - ii. If yes, ARC will determine the effective date of course drop, course withdrawal, or college withdrawal.
 - iii. If college withdrawal, Assistant Provost will submit administrative withdrawal.

DECISION – For decision-making purposes only. This will not appear in the Final Policy that is posted to the Policy Repository.

Date of Draft Policy Review	Click or tap to enter a date.	
Name of Reviewing Committee/Individual		
Date Approved	Click or tap to enter a date. Comments:	
Date Rejected	Click or tap to enter a date.	Comments:
Date Draft Tabled or Further Review Needed (provide comments including plan for re-submission)	Click or tap to enter a date.	Comments: