

## **MEMORANDUM**

**TO:** University Faculty

**FROM:** Vilas A. Prabhu, Ph.D., M.B.A.  
Provost and Vice President  
for Academic Affairs

**DATE:** March 30, 2020

**RE: FACULTY REPORTING RESPONSIBILITIES RE: CLASS ATTENDANCE –  
DUE APRIL 3, 2020**

To ensure that the University will be in compliance with Federal Department of Education regulation 34CFR 668.21, please be reminded that faculty must report any student who stopped attending after the end of the add/drop period by the 60% point of the semester, which is **April 3, 2020**. This deadline has not been changed. The Registrar's Office advises that faculty will continue to be able to use Early Alerts until April 17 to report students who stopped attending before April 3<sup>rd</sup>.

For mini-mester (i.e., 7-week classes), such reporting should be done at the time of grade submission, at the end of each mini-mester. Please see the attachment for reporting details.

This reporting requirement is in accordance with the University Governance Policy "[Drop for Non-Attendance](#)." These data are critical to determining dates of unofficial withdrawals which require return of funds to the federal government. Disciplinary action may result for lack of timely reporting.

Since classes are transitioning to remote instruction, it is important that you are aware of how attendance is determined. For all remote instruction, we will follow the Federal Financial Aid requirements for a distance education course. Please review the following excerpt from the Drop for Non-Attendance policy:

### **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:

- Student submission of an academic assignment.
- Student submission of an exam.
- Documented student participation in an interactive tutorial or computer assisted instruction.
- A posting by the student showing the student's participation in an online study group that is assigned by the institution.
- A posting by the student in a discussion forum showing the student's participation in an online discussion about academic matters.
- 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 studies in the course.

Thank you for your cooperation with this reporting requirement. Your flexibility and commitment to supporting our students as you transition to online instruction is deeply appreciated.

## **Reporting for Non-Attendance Tip Sheet for Faculty**

**Background:** In order to comply with U.S. Department of Education Regulation 34CFR 668.21, Millersville University must report the names of financial aid recipients to the U.S. Department of Education within 30 days of the date they stop attending class. Failure to do so will result in the levying of significant fines against the University and the potential loss of access to federally-funded financial aid (i.e., Title IV funds).

### **Definitions of Non-Attendance**

For the purpose of financial aid reporting, students are considered **in attendance** if they engage in any or all of the following activities:

1. Face-to-Face classes:
  - a. Attending class
  - b. Submitting homework assignments
  - c. Sitting for exams (in person or online)
  - d. Where applicable, logging in to the course's D2L page
  - e. Communicating<sup>1</sup> with the course Instructor either in person or electronically
  
2. Distance/Online courses
  - a. Submitting homework assignments
  - b. Taking exams
  - c. Logging in to the course's D2L page
  - d. Communicating<sup>1</sup> with the course Instructor either in person or electronically

### **Reporting Periods & Mechanisms**

There are **two** official reporting periods for 15-week classes meeting during Fall and Spring semesters. Deadlines and mechanisms for reporting are:

1. **The end of week two:** Students who meet criteria for non-attendance during the first two weeks of class should be reported **directly to the Registrar:**
  - a. Email the Registrar at [registrar@millersville.edu](mailto:registrar@millersville.edu).
  - b. Include the name, last date of attendance, and CRN for each student/course you are reporting.
  
2. **The end of week ten:** Students who meet criteria for non-attendance between weeks three and ten of the semester should be reported **through the Early Alert System.** To do so:
  - a. Log in to MAX.
  - b. Select "Faculty Services."
  - c. Select "Early Alert."

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<sup>1</sup> This excludes communication that is not related to course content or attendance.

- d. Locate the course in which non-attending student(s) are enrolled. Select “Provide Feedback between...” associated with this course.
- e. Click on the rightward pointing arrow next to the student you intend to report.
- f. Select “Report to the Registrar's Office that the student has stopped attending the course. Enter last date of attendance in the comments below.”
- g. Enter the last date of attendance in the comments section.
- h. Repeat steps e-g for each student in this course.
- i. Select “Submit” at the bottom of the page.
- j. To report students in other courses, select “Provide feedback for another course” at the bottom of the page and repeat steps (a)-(i).

While these dates mark official reporting periods, Faculty are encouraged to report a student as soon as they suspect s/he has stopped attending class.

If a student stops attending your class after the end of the 10<sup>th</sup> week, they should receive a grade as earned.

Faculty with courses that meet for fewer than 15 weeks should contact [registrar@millersville.edu](mailto:registrar@millersville.edu) to obtain the relevant reporting dates.

### **Questions**

Any questions regarding if, when, or how to report students for non-attendance should be directed to the appropriate College Dean.

### **Thank You**

The financial health and sustainability of Millersville University depends on the accurate and timely reporting of students who may be in violation of federal guidelines for financial aid. We appreciate the time and effort invested by Faculty members in helping us comply with this federal regulation.