MEMORANDUM

TO: University Faculty  
FROM: Vilas A. Prabhu, Ph.D., M.B.A.  
Provost and Vice President for Academic Affairs  
DATE: August 20, 2020  
RE: FACULTY REPORTING RESPONSIBILITIES RE: CLASS ATTENDANCE

To ensure that the University will be in compliance with Federal Department of Education regulation 34 CFR 668.21, at the beginning of each term or semester, faculty are directed to report the names of all students registered in their classes who fail to attend both of the first two class meetings. Exceptions are permitted if students have contacted the faculty to make special arrangements.

Official registration is based on the course roster accessible through MAX. Please be aware that if you add students manually to D2L class rosters, they are not officially registered for the class until they do so through MAX.

Students are notified on the first day of the semester by a separate email of this policy.

Faculty should report students who meet criteria for non-attendance during the first two weeks of class by email directly to the Registrar at registrar@millersville.edu. Include the name, last date of attendance, and CRN for each student/course you are reporting. The reporting due date is Friday, September 4, 2020.

Since 80% of classes have transitioned 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.

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.

For non-attendance identified after the second week of the semester, faculty must report estimated date of last attendance by the 60% point of the semester, which is **October 30, 2020**. 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. These data are critical to determining dates of unofficial withdrawals which require return of funds to the federal government. The attached file provides guidance on how to report non-attending students using the Early Alert system.

Thank you for your cooperation with this reporting requirement.
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. Communicating1 with the course Instructor either in person or electronically

2. Distance/Online courses
   a. Submitting homework assignments
   b. Taking exams
   c. Communicating1 with the course Instructor either in person or electronically
   d. Participating1 in an interactive tutorial or computer-assisted instruction
   e. Posting1 as part of participation in an online study group
   f. Posting1 in a discussion forum about academic matters

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.
   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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1 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 10th week, they should receive a grade as earned.

Faculty with courses that meet for fewer than 15 weeks should contact 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.