

Foothill Faculty Senate DRAFT Resolution: Student Attendance in Online Classes

In compliance with federal requirements to document student attendance in online classes, faculty must record a weekly academically related activity such as discussion forum posting, online quiz, reflection, assignment, exam, email, field trip, telephone call or electronic communication at least through week 7 or the drop with “W” deadline for each student in an online class. This is in line with our commitment to best practices of “Regular, Timely and Effective Student/Faculty Contact” as approved by the Faculty Senate and submitted by faculty on the "Course Approval Application for Online/Distance Learning Delivery" and vital to students receiving financial aid.

Support Information

Problem

The definition of attendance in fully online courses impacts many of our students in various ways but most significantly for students with financial aid. For example, the “last day of attendance” is used to determine the amount of aid a student is eligible to receive when that student withdraws or leaves a course. Unfortunately, **no district-wide or college-wide standard definition of "last day of attendance" is currently in place for fully online courses.**

Advantages to clearly defining and reporting attendance in on-line courses include:

- Reduce federal and state audit liabilities/exceptions (compliance, enrollment status, benefits receipt) for financial aid recipients
- Reduce amount financial aid recipients must repay to federal agencies
- Reduce amount Foothill College must pay for financial aid recipients to federal agencies

The Western Cooperative for Educational Telecommunications (WCET) reports that the US Department of Education **may no longer accept *last login* as sufficient** for the definition of "last day of attendance" for the purposes of federal financial aid. This means that although the "student tracking" feature in Etudes is helpful for many purposes, it is *NOT* sufficient for defining attendance for purposes of financial aid.

Solution

An appropriate solution is to develop a college policy and/or definition to establish more accurate attendance record-keeping for online courses.

Attendance must be based on student’s Last Day of Attendance in an “academically related activity” that can be documented.

The following are “academically related activity” for the purposes of attendance:

- Meaningful participation in an online discussion
- Student initiating contact with a faculty member to ask a course-related question via email or chat room
- Quizzes, tests, assignment submission

The following are **not** acceptable for purposes of attendance:

- Student-tracking of course site login
- Student posting of bio in Discussion forum

Background

According to Kevin Harral, Director of Financial Aid at Foothill College:

"There have been some ongoing issues around processing drops that impact financial aid students and the Financial Aid Office perhaps more than others. When a student is disbursed financial aid funds, it is based on the numbers of units they are carrying at the moment of authorizing disbursement. When a student drops a class and the drop date is appropriately reported by faculty and recorded by Admissions and Records, there really is no issue. The student may owe money back and we use the SIS/Banner reported drop date to perform that mandatory Federal calculation. However, if a student drop is back-dated to before the quarter started or a late drop is processed it often causes significant financial aid issues.

*Essentially a back-dated drop tells an auditor that the student was never really enrolled, but the Financial Aid Office would have disbursed funds. They call this an exception to the audit report – essentially something doesn't match-up and is an issue that must be addressed. The Financial Aid Office carries a significant Federal and state liability when disbursing the millions of dollars that we do each year and **we rely heavily on accurate reporting of enrollment data from faculty and the definition of non-attendance in on-line courses.***

By clearly defining this and correctly reporting it within the Banner system our disbursement of funds and the return of funds for ineligible students would be dramatically strengthened and the schools liability in this regard would be reduced. I am sure this type of issue is also relevant for our student veterans, our international students, our athletes, and perhaps other groups as well who all have significant requirements riding on accurate enrollment data.

Student Examples:

Sonia received \$224 of Pell Grant on July 31 for a 5.0 units class in summer quarter. A "late drop" is processed for her on August 6, three weeks after the drop deadline. This could even be due to her online attendance never being established.

Sonia owes Foothill College \$224 and has a hold on her records until paid in full. Her official records show financial aid disbursed when she was officially dropped, creating an audit exception.

- *If Sonia had dropped by the Census deadline, she would not have been paid and would not owe any funds and no audit exception would result.*
- *If Sonia had withdrawn with a W, she would owe a smaller amount and no audit exception would result.*
- *If Sonia had received a poor grade in the class, she would keep her funds and no audit exception would result.*

Justin received \$791 in Pell Grant on September 25 for 19.0 units for the fall quarter. He dropped three of his four classes by the drop deadline. A fourth "late drop" was processed for him on December 12, nine weeks after the deadline.

- *Justin owes Foothill College \$114.72 and Foothill College owes the federal government \$88.57. His official records show financial aid disbursed when he was officially dropped, creating an audit exception. He has a hold on his records until paid in full.*
- *If Justin had dropped by the Census deadline, he would still owe the funds but no audit exception would exist.*
- *If Justin had withdrawn with a W, he would have owed a smaller portion and De Anza would not have owed any funds and no audit exception would result.*
- *If Justin had received a poor grade, he would keep the funds, be on probation but still be eligible for funds the following quarter, and no audit exception would result."*

College of the Canyons was audited on this issue on 9/13/10 with only two weeks advance notice so it's in the best interests of Foothill College to be proactive.