

**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

**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 2020-2021](#);

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).*

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**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. (FSA A-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 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** (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 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. (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.