**Financial Aid Requirements Regarding Attendance**

The Department of Education has made it clear that we, as a University, are responsible for knowing and proving how long a student participated in a course. There are two times per term when the Financial Aid office attempts to gather this information.

1. **Three-week attendance.** Professors are asked a Yes/No question about whether the student has participated and/or attended the course within the first three weeks. This information is very important to help us determine that the student has begun attending. The information we receive has the following consequences.
	1. The student is marked Yes for all of their classes. We feel confident that the student has begun attending every class for which the student is receiving aid.
	2. The student is marked Yes for some classes and No for other classes. If this drops the student’s attendance below 12 hours, we must remove some Pell.
		1. For example, the student is enrolled in 15 hours but was only marked Yes for 9 hours. The student can only receive 9 hours worth of Pell. The student can appeal if the student feels that the Professor has reported incorrectly.
		2. If the 3-week attendance report indicates that the student has attended fewer than 6 hours, they also become ineligible for Direct Loans.
	3. The student is marked No for all of their classes. This student will be administratively withdrawn and we will send back all of their aid.
	4. There is a problem that can happen if the Professor marks a student Yes erroneously: If the student actually never attended (or participated in an online class) and the Prof puts the Last Date of Attendance as the first day of class, now we have a conflict because that student should have been a No on the 3-week attendance report and we should have returned aid at that time.
	5. It is important to note that asking a Yes/No question after 3 weeks does not count as taking attendance for Return of Funds purposes.
2. **All F evaluation.** Federal regulations define two types of withdrawals: official and unofficial. An official withdrawal is when the student goes through the process to drop all of their classes. In that instance, it is easy for us to know how much aid to return because we have an official withdrawal date in Banner.

An unofficial withdrawal is when a student stops attending/participating in all of their classes prior to 60% of the term, but continues to be enrolled. Since we are a non-attendance taking University, we are allowed to use the mid-point of the semester as the withdrawal date, resulting in 50% of the student’s aid being returned to the Department of Education. However, if we can document that the student actually attended beyond the 60% date, the student can generally retain their aid.

When the Registrar gives us the list of students who have failed every course (or failed some and dropped some), we look up the Last Date of Attendance.  If any of the professors have reported a Last Date of Attendance after the 60% date, we reach out to the Professors that the student had in that term to document the Academically Related Activity.  We have to keep records of the Academically Related Activity in the student’s file when the student did in fact “earn the F” and we don’t return any funds, in case that student would happen to be pulled in our annual audit sample. Here are the different scenarios for this process:

* 1. The student gets all F’s and every LDA in Banner is before the 60% date in October. We use the mid-point as the withdrawal date and send back half of the aid. No need to email any of the professors/instructors. Sending back half of the student’s aid almost always results in the student owing a balance to the University.
	2. The student gets all F’s and at least one professor entered an LDA beyond the 60% date in October. We email the Professors and ask for the academically related activity that supports the date entered in Banner because this is the only proof that we have for the auditors to show that we are entitled to 100% of the student’s aid.
	3. Entering erroneous LDA dates when grading may cause us unnecessary work because we may email all of the Professors and find out that the student actually did not participate beyond 60%, or that the Professors cannot substantiate that date, and then we have to use the mid-point and return half of the aid.