This policy provides campus-wide mechanisms for faculty to: 1) report students at the beginning of the semester who have registered but are not attending; 2) at the end of each semester, confirm the date of last attendance for all students who receive failing grades so that financial aid refunds can be determined. Face-to-face and online class formats are addressed. This policy applies to fall and spring semesters, winter session, and all summer sessions. It also applies to courses following non-traditional schedules such as 7-week “mini-mester” courses. For courses taught outside the normal semester schedule, the timing of the 60% point will need to be separately determined.

These faculty activities are necessary for the university to comply with Federal Department of Education regulation 34CFR 668.21, which requires that if a student does not begin attendance in a payment period, the institution must return all federal financial aid funds credited or disbursed to that student for which it is responsible. Such a return must be made “no later than 30 days after the date that the institution becomes aware that the student will not or has not begun attendance.”

Initial Class Attendance

This policy establishes a presumption that if students miss both of the first two classes of the semester without having made arrangements with their instructor, then they do not intend to remain in class. The Registrar will administratively drop such students for non-attendance after receiving attendance data from faculty. This will allow course seats to be made available for other students who wish to register, and will assist in identifying non-attending students so that financial aid can be returned to the U.S. Department of Education in a timely fashion.

At the beginning of the semester (or course for those following a non-standard schedule), faculty will check student rosters for all classes and report through the appropriate means the names of any students who fail to attend both of the first two class meetings. Exceptions are permitted if students have contacted the faculty to make special arrangements.

The Provost’s Office will remind faculty of the expectation to verify student attendance at the beginning of each regular semester and will provide details of how absences are to be reported.
F and Z Grades

The United States Department of Education considers students to have “earned” failing grades if they participated in class beyond the 60% point of the course’s scheduled meeting time. For regular semesters, the 60% point is the end of the ninth week of classes. If students stop attending prior to the 60% point and do not officially withdraw from the course, the resulting failing grades are considered “unearned.”

To aid in compliance, Millersville University will use F and Z grades to indicate “earned” and “unearned” course failures consistent with this reporting requirement:

- Faculty should assign “Z” to students who stopped attending class before the 60% point of the semester.
- Faculty should assign “F” to students who attend beyond the 60% point of the semester but fail to meet the requirements to pass the course.

Date of Last Attendance (Failing Grades Only)

For all students assigned failing grades at the end of the semester (Z or F), faculty must include a best estimate for a date of last attendance for each student. This date allows Millersville to compute the portion of each student’s financial aid that must be returned to the federal government. Return of aid is required for any student who stopped attending prior to the 60% point of the semester (and who therefore should have received a Z grade).

For students who completed the semester, the date of last attendance is normally the date of the final examination.

For students who did not complete the semester, the date of last attendance can be established by classroom attendance records or through records of students’ participation in activities such as the following: tests, quizzes, assignment submissions, online discussion posts, or any other meaningful interaction with the faculty. The following guidance is provided in federal regulations:

* Academically Related Activity for Face to Face Instruction (FSA 5-59)

Academically related activities include, but are not limited to:
- Physically attending a class where there is an opportunity for direct interaction between the instructor and students.
- Submitting an academic assignment.
- Taking an exam, an interactive tutorial, or computer-assisted instruction.
- Attending a study group that is assigned by the university.
- Participating in an online discussion about academic matters.
- Initiating contact with a faculty member to ask a question about the academic subject studied in the course.

Academically related activities do not include activities where a student may be present but not academically engaged, such as:
- Living in institutional housing.
• Participating in the university’s meal plan.
• Logging into an online class without active participation.
• Participating in academic counseling or advisement.

*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.