Title IV Roster Verification
Approved by Academic Senate February 2, 2021

The AP&P Committee moves that the Senate adopt the following policy to establish new federal class roster verification processes beginning in Fall 2021 in order to ensure compliance with Title IV financial aid policies.

• Technical infrastructure will be established by ITS for roster verification in SIMS, PeopleSoft, and Canvas, including manual (marking rosters), semi-manual (uploading a spreadsheet) and semi-automatic (granting ITS access to class participation data through tools like Qwickly) methods for instructors to mark student activity.
• Instructors of all courses will use their choice of the roster verification methods to indicate which students have attended class or engaged in an academic activity; this is to be completed within 5 days after the add/drop deadline each semester.
• The Office of Financial Aid and Scholarships will utilize the roster/participation data to adjust financial aid packages as required by Department of Education policy.

Rationale: The U.S. Department of Education requires institutions to return funding from Title IV financial aid programs no later than 30 days after the institution becomes aware that a student who has received aid will not or has not begun attendance or participation in an academic activity. The Secretary of Education considers that a student has not begun attendance in a payment period or period of enrollment if the institution is unable to document the student's attendance at any class during the payment period or period of enrollment (34 C.F.R. § 668.21). Peer institutions including Colorado State University, University of Missouri–Columbia, Stony Brook University, and UC Davis have received significant fines after federal audits found them to be out of compliance. This new policy is intended to (a) ensure compliance, (b) minimize faculty and staff workloads, and (c) protect our most economically-vulnerable students from loss of financial aid.