

# **Snow College Title IV Participation Compliance Proposal**

## **Last Date of Attendance (34 CFR 668.22)**

### **Preface**

It is mandated that we make, as an institution, an adjustment to our "Title IV Return of Funds Policy" to accommodate deficiencies in determining a student's eligibility and last date of attendance.

To be eligible for financial aid a student must be an eligible student in an eligible program and must prove that they attended classes. If a student does not complete the entire payment period, or if the student fails a class, the institution must determine the last date of attendance. In other words we must prove the student earned the "F" and didn't walk away.

Since Snow College is not required to take attendance we must have a policy in place to determine if a student began attendance and if a student completed the payment period.

### **Who must provide the Last Date of Attendance?**

- Since the instructor is the only person at the institution who can document whether a student attended class or participated in an academically-related activity, this documentation must come from the instructor.

### **What if, as an instructor, I do not take attendance?**

- If you do not take attendance, you should provide the date of the last known academically -related activity. Examples of academically -related activities are: taking an examination or quiz, tutorials, computer-assisted instruction, completing an academic assignment, paper, or project, or attending a study group required by the faculty where attendance is taken. 34 CFR 668.22(l)(7)(i & ii)  
**If there is no documented attendance or academically-related activity, you must report "Never Attended".**

### **What if I do not know if the student attended and I have no record of academic activity?**

- Indicate the student did not attend. According to federal regulations 34 CFR 668.21(c), the student is considered to have not begun attendance if the institution is unable to document the student's attendance.

### **What if I saw the student in class but do not take attendance, and there is no academic activity record?**

- If attendance cannot be documented through actual attendance records or an academically-related event, you must report that the student never attended. 34 CFR 668.21(c)

**What impact is there to the student when “Never Attended” is indicated?**

- The student may have their financial aid reduced or cancelled for the semester.

**As an instructor I submitted an incorrect “last date of attendance” date. How do I correct this?**

- Unfortunately, this cannot be administratively corrected in our SIS system. Please contact the Financial Aid Office with the following information: student name, student ID, term, course, and correct last date of attendance.

**End of Term Grading**

At the end of the term when you enter an “F” grade you will be prompted to provide a last date of attendance. This date could be the last date of the term if the student earned the “F”.

**Conclusion**

The Financial Aid Office understands that this will be an inconvenience for you, however, since financial aid is an institutional program, and since the President signs the participation agreement for the entire institution, we hope you will overlook a little inconvenience so that our students can participate in receiving financial aid to attend Snow College.