MEMORANDUM

TO: The Presidents of the Colleges
   The Dean of the Sophie Davis School of Biomedical Education
   The Dean of the School of Journalism
   The Dean of the School of Professional Studies
   The Dean of the CUNY Law School

FROM: Lexa Logue, Executive Vice Chancellor and University Provost

RE: Verification of Student Enrollment Policy Effective Fall 2009

DATE: July 1, 2009

As you know from the June 22, 2009 meeting of the CUNY Board of Trustees, the Committee on Academic Policy and Program Review recommended, and the University Board of Trustees subsequently passed, a resolution that uniform guidelines and procedures regarding verification of student enrollment and withdrawal be implemented university-wide in order to achieve compliance with Federal Title IV regulations, effective Fall 2009. This resolution followed, over the past several months, extensive consultation with the Office of the University Controller, Internal Audit, Office of the University Registrar, Office of Student Financial Aid, Enrollment Management, Office of Institutional Research, and constituent councils across the University on the issue of verification of enrollment for purposes of justifying state aid FTE claims and enrollment status for federal aid programs.

The present memorandum supersedes prior memoranda on this subject and serves to establish officially the policy for verification of student enrollment. Prospectively for academic years 2009-10 and thereafter, the Office of the University Controller and Internal Audit will accept the following procedure for both senior and community colleges.

Federal Title IV regulations require that a student begin attendance to qualify for Title IV aid. Each college must be able to document commencement of attendance in each course or attendance at an academically related event connected to that course. A student is considered to have begun attendance if the student attends at least one day of class or is otherwise active and participating in the course (e.g. by submitting assignments, attending a required study group, academic conference or tutorial) for each course used to determine Title IV eligibility. A course for which a college is unable to document that the student ever attended cannot be included as a course eligible for the disbursement of federal aid.

Faculty members at all schools and colleges of The City University of New York are to be provided a census date roster at the end of the program adjustment period of each term including winter and summer. Faculty and instructors are required to indicate on the rosters verification of attendance for students enrolled in the class. They must complete the official roster and submit it on or before one week after the end of the 20% point in the term/session. At that point in time, submission of the roster will effectively certify that the listed students noted as present are
enrolled and have attended at least once in the class indicated on this roster (i.e., began attending classes and/or pursuing the prescribed course work or are otherwise active and participating in the course, e.g. by submitting assignments, attending a required study group, academic conference or tutorial).

The College will effectively process administrative withdrawals (WN) for students who have been reported as never attended, i.e. have not begun attending. An adjusted roster excluding these students will be produced after WNs are posted, and retained as official records. Daily attendance rosters or grade books will not be required. Beginning Fall 2009, WN administrative withdrawals will have no punitive impact on students’ grade point averages.

In cases in which a college cannot establish that the student began attendance, federal grants and loan funds need to be returned. Federal regulations require that each college return federal funds no later than 30 days after a college becomes aware that the student did not begin attendance. At an institution that is not required to take attendance but that has a census date on which it reports its enrollment levels to a state, local jurisdiction or outside agency, once the institution has determined that a student has or has not begun attendance, it would be reasonable to expect the institution to return funds as soon as possible, but no later than 30 days following the census date.

Detailed implementation guidelines and procedures will be forthcoming from the University Registrar. If there are any questions about this memorandum and the procedures please contact University Registrar Annamarie Bianco at (212) 280-5719 or annamarie.bianco@mail.cuny.edu. Thank you so much for your attention to these procedures which are so critical to both our students’ and our colleges’ financial well being.

cc: Chancellor Matthew Goldstein
    Chancellor’s Cabinet
    University Dean for the Executive Office, Bob Ptachik
    University Dean of Institutional Research and Assessment, David Crook
    University Registrar, Annamarie Bianco
    University Controller, Barry Kaufman
    University Office of Student Financial Aid
    Campus Chief Academic Officers
    Campus Vice Presidents
    Campus Registrars
    Campus Directors of Student Financial Aid
    Campus Bursars