Federal Regulation Regarding Disbursement of Federal Financial Aid Funds (Title IV)
Policy for Confirming Student Enrollment and Engagement in Courses
Gatton College of Business and Economics

Federal regulation mandates that federal financial aid funds (Title IV) may only be disbursed to students who are actually enrolled and engaged in coursework. This regulation mandates that institutions provide evidence of engagement early in each semester. Failure to provide evidence includes sizeable fees and fines.

To comply with this mandate, all instructors of undergraduate and graduate courses (including independent studies, online courses, internships, independent studies, etc.) in the Gatton College will be required to confirm student engagement in classes during the two-week period following the last day to add a class.

The Ethical Principles of the University of Kentucky require all employees to “comply with the policies and procedures of the University of Kentucky and applicable state and federal laws and regulations”.

Frequently Asked Questions:

1. **What constitutes verification of engagement?**
   
   Student engagement encompasses attendance and participation.

   In a course that is delivered face to face, verification of engagement may be obtained through:
   - The submission of a quiz, homework, or some other assignment in hard copy or through Canvas.
   - The use of classroom response system, i.e. clickers.
   - The taking of attendance by calling names from the official roster, checking IDs, or another similar method.
   - Participation in an online forum or live class discussion.

   In a course that is delivered online, verification of engagement may be obtained through:
   - The submission of an assignment.
   - Posting an introduction or comment in a discussion forum.

   Simply logging into Canvas would not provide verification in either an online or face to face course.

   For internships, submission of the signed internship agreement would constitute verification of engagement.

   For independent study classes (for graduate and undergraduate students), the faculty member should confirm that there is a record of interaction with the student during the confirmation period. This may be a face-to-face meeting or a documented interaction (paper, email, substantial online interaction, or some type of submission by the student). Submission of a plan of study would count if it occurred during the semester. Plans of study created prior to the start of the semester would not provide verification.
Interaction with a student’s faculty advisor would verify engagement for PhD students who are registered for dissertation hours.

Select one or more of the above to implement in your course You have the option to explicitly state the method and/or date in the syllabus that you will assess engagement. (see FAQ #7 for suggested verbiage for syllabus).

2. **When will I submit verification of engagement?**
   In a regular semester, the first week following the last day to add a course will be the monitoring period when instructors must confirm engagement. The second week following the last day to add a course will be the reporting period. The days are adjusted for part-of-term courses.

3. **Do I have to monitor the engagement the entire designated week if I do not normally take attendance or use the instrument daily?**
   No, you have the option to verify engagement once.

4. **What happens if a student has an absence (excused or unexcused) for the day engagement is determined?**
   Faculty have the discretion to determine if a student has engaged at any point within the first 15 days of the semester. If the student has otherwise demonstrated engagement in the course (such as with an assignment), or if the student has substantive interaction (such as a face-to-face meeting), then the instructor may certify that the student has been engaged in the course. Faculty may use their discretion in cases such as this.

5. **Will I receive a reminder about the need to verify engagement?**
   Yes. A verification prompt will be initiated after the last day to add classes has passed.

6. **How will I report engagement?**
   Faculty will report students for non-engagement utilizing the class roster in MYUK. When faculty access the Class Roll tab under Faculty Services they will be able to select all the students on the roster with one click to indicate their engagement and unselect those students who have not engaged. Currently, there is not a mechanism to upload this information from Canvas.
7. Can I notify students that participation will be monitored, or attendance will be taken, and absences or failure to submit an assignment may result in them being dropped from the course?
   Yes, please add the following to your syllabus and discuss this policy the first day of class:

   *In order to meet federal regulations, the instructor will monitor student engagement in this class through attendance or assignments. The instructor will assess student engagement at least once during the first three weeks of the semester using an instrument or activity. Students whose engagement cannot be determined on that date may be dropped from the course. If you will be missing any class period or will not be submitting an assignment during that period, it is your responsibility to notify the instructor, regardless if the absence or missed assignment is excused or not under University rules.*

   You have the option to explicitly state the method and/or date in the syllabus that you will assess engagement.

8. What happens after I submit a student for non-engagement?
   Once a student is marked for non-engagement during the third week, the student will be dropped from the class and from Canvas with grade symbol “NA”. The student, faculty member, and advisor will be notified of the drop action. If the student drops below full-time, their financial aid disbursement will be reduced. The drop will result in a 50% refund to the student and courses dropped for non-engagement will not appear on the student’s transcript. The student may seek relief through the tuition appeals process if they are unfairly/adversely impacted by the new engagement requirements and forced to withdraw from a class.

9. Do I need to report anything if all students are engaged?
   Yes, faculty must indicate the results of the monitoring activity by the end of the reporting period for each section taught regardless of the outcome of the monitoring process. When faculty access the Class Roll tab under Faculty Services they will be able to select all the students on the roster with one click to indicate their attendance.

10. What happens if a student is incorrectly dropped from my course?
    The student must communicate with the instructor to be reinstated. The instructor of record will notify the Office of the Registrar (Kim Taylor Kim.Taylor@uky.edu) and the student will be reinstated.

11. What if there are special circumstances, i.e. military service, etc.?
    Faculty are always welcome to reach out to the Executive Associate Dean and/or the Associate Dean responsible for the program you are teaching in when there is an unusual circumstance or if you have any questions.