

1.19	Policy on Grading, Notations, and Academic Engagement	20-052	2020-04-16
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## Policy on Grading, Notations, and Academic Engagement

The CSCU Provost and Senior Vice President for Academic and Student Affairs, or designee, shall be the presiding authority over the application of this policy to all community colleges. It shall be included in all college catalogs, student handbooks, and college websites, and shall be made available upon request.

### Grading

Affirmed for Fall 2020, all CSCU community colleges will use the following grading system defined below.

Grade	Quality Points
A	4.0
A-	3.7
B+	3.3
B	3.0
B-	2.7
C+	2.3
C	2.0
C-	1.7
D+	1.3
D	1.0
D-	0.7
F	0.0

The calculation of the Grade Point Average (GPA) shall be two decimal places, truncated.

The letter grades shown above, with an additional designation of “#,” shall also be used for grades awarded to students in developmental courses.

### I – Incomplete

Used as a temporary grade assigned by a faculty member when coursework is missing and the student agrees to complete the requirements.

Although a student may request an Incomplete, the faculty member is not required to honor the request. Faculty members should assign an Incomplete when there are extenuating circumstances, such as illness, that prevent a student from completing the assigned work on time. Further consideration should be given to determine if the student has attended for at least 60% of the duration of the course and completed the majority of the course requirements, and, in the judgment of the faculty member, the student can complete the remaining work no later than the tenth week of the next standard semester.

Any faculty member that assigns an Incomplete shall document such an activity, and inform the student, the Academic Dean, the Registrar, and other appropriate parties, as needed, using a common form. Supporting documentation, agreed upon by both the faculty and student, must include:

- A brief description of the requirements to be completed;
- The date by which the coursework must be submitted to the faculty member;
- A statement that the Incomplete will change to a specific letter grade if the work is not completed by the tenth week of the next standard semester.

If a student submits the required work on time, the faculty member shall calculate a grade to replace the Incomplete and submit it to the Registrar no later than the 10<sup>th</sup> week of the following semester. If a student fails to complete the required work or fails to submit the work by the specified time, or if the faculty member fails to submit a replacement grade, the Registrar shall convert the Incomplete to the letter grade specified, and that letter grade shall be entered on the student's transcript.

Students with an Incomplete are temporarily ineligible for semester or graduation honors. Upon conversion of the Incomplete to a letter grade, students may retroactively receive semester or graduation honors, and such recognition shall appear on the transcript, provided the student has earned the required GPA.

### **Administrative Transcript Notations**

All colleges will use the following system of administrative transcript notations for student records, when required. Any other letters, whether called administrative notations, transcript notations, non-academic grades, or otherwise, currently in use shall be eliminated.

#### **AU – Audit**

Used for students not wishing credit for a course taken. This status will allow them to participate in class activities without being required to meet the examination requirements of the course. Students may ask to have papers critiqued, but faculty members are not required to grade an auditor's coursework. Full tuition and fees are charged for courses audited. A student who wishes to change from credit to audit status must request this within the first four weeks of the course, using such forms and procedures as the college may prescribe. Students auditing a course may not change to credit status.

#### **M – Maintaining Progress**

Used only for developmental courses to indicate that the student is maintaining progress, but not at the usual rate. It may be given to a student for a course only twice.

#### **P – Pass**

Used for successful completion of courses taken on a pass/fail basis. Students failing will receive a letter grade of "F."

#### **TR – Transfer**

Used in lieu of grades for courses accepted for credit from other institutions of higher education.

#### **W – Withdrawal**

Used to indicate that a student has withdrawn from a course.

## **Academic Engagement**

While none of the community colleges are considered attendance-taking institutions, they are required to verify the academic engagement of each student in each registered course by demonstrating “academic attendance” or an “academically-related activity” for Title IV purposes. This must be completed prior to the predetermined census date of each traditional semester, as well as during periods of enrollment shorter than the traditional 15-week semester (i.e. summer terms). The purpose of this practice is to identify students who have enrolled in coursework, but have not demonstrated an academically-related activity as a means to accurately report official college enrollment and meet the regulatory standard of compliance.

## **Required Activity Prior to Census**

All students are required to demonstrate academic engagement (defined below) in each of their registered courses no later than the predetermined census date of each period of enrollment. Students who make this demonstration in at least one of their registered courses shall be considered to have begun the period of enrollment. Students who do not make this demonstration in any registered courses shall be considered to have not begun the period of enrollment.

## **Students Who Begin a Period of Enrollment**

Students who begin a period of enrollment shall be counted in official census data, reflective of their actual enrollment status. Students who then cease engagement in their coursework, without officially withdrawing from the college prior to the end of the withdrawal period, shall be assigned a letter grade of “F” with a corresponding last date of academic engagement for each affected course. These students shall be considered an unofficial withdrawal from the college, and be subject to Return of Title IV regulations, if applicable. The latest date reported by faculty shall be the date of determination for unofficial withdrawal from the college.

## **Students Who Do Not Begin a Period of Enrollment**

Students who are determined to have not academically engaged in a period of enrollment leading up to census shall be assigned a registration status of “Never Participated (NP)” for each affected course. Students assigned an NP for all courses shall be removed from the period of enrollment, and shall be counted as “never attended” for enrollment reporting purposes. Courses with an NP designation are not counted toward a college’s official census, and affected students are not eligible to receive financial aid for courses assigned this status.

### *NP – Never Participated*

A registration status used for students who have enrolled in coursework, but have failed to engage in an academically related activity by the predetermined census date. Students who receive an NP designation are no longer permitted to attend a course section after an NP has been reported. Additionally, they are not eligible to receive a final grade, and not eligible to access the learning management system for the affected course section.

## **Academic Engagement**

In accordance with federal regulatory definition, academic engagement (otherwise known as “academic attendance” and “attendance at an academically-related activity”) includes, but is 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 institution;
- Participating in an online discussion about academic matters; and
- Initiating contact with a faculty member to ask a question about the academic subject studied in the course.

This does not include activities where a student may be present, but not academically engaged, such as:

- Logging into an online class without active participation; or
- Participating in academic counseling or advising.

The institution must make a determination of “academic attendance” or an “academically related activity;” a student’s certification of attendance that is not supported by institutional documentation is not acceptable.

04/03/2020 – BOR Academic and Student Affairs Committee

04/16/2020 – Board of Regents

**ITEM**

The proposed policy seeks to affirm the current grading structure used by all CSCU community colleges, as well as to clarify the definitions and usage of administrative transcript notations. This proposal further seeks to confirm a student's active engagement in their registered coursework prior to each 15-week semester census, and to provide a uniform framework for determining an unofficial withdrawal. This policy shall be utilized as a means to meet the standards of Title IV eligibility for financial aid students, resulting in an accurate depiction of official student enrollment at census.

**BACKGROUND**

In 2013, the US Department of Education/Federal Student Aid conducted a review of Housatonic Community College's administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 USC §§ 1070 et seq. (Title IV, HEA programs). While there were various findings cited in the 2014 audit report, the most concerning was "Failure to Confirm Enrollment Status" due to the impact on academic grading in relation to Title IV students. In 2015, the US Department of Education delivered a Final Program Review Determination, issuing a liability due from the college in the amount of \$418,154.64 directly attributable to this single finding. Also in 2015, President Paul Broadie II filed a written appeal to the US Department of Education, challenging the finding and liability.

In 2016, Administrative Judge Robert G. Layton upheld the decision, rendering the college liable to pay the US Department of Education. Housatonic Community College was unable to provide sufficient evidence to support its assertion that it confirmed students' enrollment status in terms of disbursing Title IV funds, and the college failed to meet its burden of proving that it properly disbursed Federal Pell Grant awards based on actual enrollment. The college was also cited for failing to consistently administer certain grades; a grade of F and an academic notation of N had been used interchangeably. It was therefore determined that the college could not accurately determine whether a student started attending a class based solely on a student's grades.

Subsequent to the US Department of Education issuing its Final Program Review Determination, the system engaged in an effort to distinguish between an "earned F" and an "unearned F" grade for all students for the purposes of determining students who had unofficially withdrawn versus completed a term with a poor grade. On August 13, 2015, the system effectively made a change to Connecticut Community Colleges Board of Trustees Policy Manual, Section 3.5.2, Administrative Transcript Notations – Letters other than A-F. Namely, the use of the "N" notation was discontinued in lieu of the creation of a "UF" notation without a policy change.

***Confirming Enrollment Status***

An institution may only disburse Title IV, HEA funds when a student is enrolled and eligible to receive those funds (34 CFR 668.164). Similarly, if a student does not begin attendance in a payment period or period of enrollment, the institution must return all Title IV, HEA program funds that were credited to the student's account at the institution or disbursed directly to the student for the payment period of enrollment (34 CFR 668.21(a)). This statement is true even for institutions that, by definition, are not required to take attendance. As such, a student's Federal Pell Grant eligibility must be recalculated if their enrollment status changes in a term (34 CFR 690.80). For financial aid purposes, a student's enrollment status should be confirmed in their registered coursework prior to each semester census and

subsequent financial aid disbursement. Final financial aid eligibility recalculations are performed at census, and funds are disbursed accordingly.

For students whose enrollment status has not been confirmed yet have been paid Title IV, HEA funds, their aid must be returned despite applicable tuition and fee charges still being present on their student accounts. This creates a liability owed to the school from the student, which often goes to collections or becomes subject to the tax intercept process – all costs to the system. In some cases, non-financial aid students would not pay tuition prior to the start of a term and be dropped for non-payment prior to the start of the term. This situation represents no financial liability owed to the college from the student. These situations present an equity issue over the treatment of financial aid versus non-financial aid students, based on the ability of financial aid to cover a student's eligible charges in relation to enrollment.

### ***Administrative Transcript Notation Definitions***

**N – No Grade**

An administrative transcript notation for any situation where there is no grade reported at the end of the traditional semester (i.e. no grade received from a faculty member, courses in progress, or no basis for a grade). From BOT 3.5.2, discontinued use without a policy change in Fall 2015.

**UF – Unearned F**

This notation is awarded to students who were enrolled in a course, did not officially withdraw, but who failed to participate in course activities through the end of the term. It is used when, in the judgment of the instructor, completed assignments and/or course activities were insufficient to make normal evaluation of academic performance possible. Students who receive this notation will have reported on their behalf a “last date of participation” by the assigning faculty member. When saved on the grade roster, this notation will immediately convert to a regular grade of F on the student's transcript. It will be punitive and count in the GPA. The UF notation is used for internal reporting and will not appear on the student's transcript. Effective for use without a policy change in Fall 2015.

### ***Effects of Prior Implementation***

The establishment of the UF was intended to create a distinction between an earned F for a student who completed a term, and a notation for a student who stopped-out of the college and did not complete the term. However, it became additionally used as a mechanism for determining whether the college confirmed a student's enrollment prior to financial aid disbursement as colleges.

Further, there were unintended consequences of implementing the UF as a grade on a student transcript. Compliance with the regulatory requirements for timely and accurate enrollment status reporting to the National Student Clearinghouse, and by extension reporting to the National Student Loan Data System (NSLDS) was jeopardized. Accurate reporting to these agencies is critical, since they determine when a student is eligible to enter repayment or deferment on a federal student loan, and determine a time limitation on Direct Subsidized Loan eligibility (in general, a student may not receive Direct Subsidized Loans for more than 150% of the published length of a program).

**RECOMMENDATION**

To provide for the equal treatment of all students, regardless of their method of payment for applicable course-related charges, it is recommended that the Board of Regents adopt a uniform policy on Grading, Notations, and Academic Engagement for all community colleges. The policy presented affirms the current grading structure, clarifies applicable administrative transcript notations, and provides a method to uniformly determine a student's enrollment status in their registered coursework across all colleges.

This recommendation clarifies the reporting of and appropriate record keeping for an unofficial withdrawal when students actively engage their registered coursework and subsequently leave the institution without officially withdrawing. The context of an academically related activity is consistent with federal regulations.

This recommendation also encompasses the following changes:

***Addition of Registration Status Determination***

NP – Never Participated. Used for students who have enrolled in coursework, but who have failed to engage in an academically related activity.

***Discontinuation of Administrative Transcript Notation***

N – No Grade (previously defined)

UF – Unearned F (previously defined)<sup>1</sup>

Of note, there are both positive and negative outcomes associated with this policy change. However, the negative outcomes identified below are the result of compliance in practice. Additionally, financial aid allocations based upon enrollment would decrease because of the actual realized enrollment (Campus-Based Financial Aid, Institutional Financial Aid, and State Financial Aid/Roberta B. Willis Scholarship Program).

***Positive Outcomes***

- Colleges will be compliant with the Higher Education Act of 1965, as amended.
- Enrollment reporting will be accurate to NSLDS.
- Census enrollment will be accurate.
- Retention rates will increase since students who never attended will no longer be counted.
- Graduation rates will increase since students who never attended will no longer be counted.
- Bad debt and collections costs will decrease.

***Negative Outcome***

- Overall enrollment will experience a correction, since non-attending students will be identified prior to census and no longer be counted in census data.

04/03/2020 – BOR Academic and Student Affairs Committee

04/16/2020 – Board of Regents

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<sup>1</sup> While not in any existing Board of Trustees or Board of Regents policies, it is highly recommended that the use of the UF notation, and all of its associated procedures, be discontinued, effective with the Fall 2020 semester.