

November 3, 2022

Dear LACCD Distance Education Faculty,

I hope this message finds you and your families healthy and that your fall classes are progressing well. I am writing to inform you about a recent audit finding concerning attendance accounting and its impact on student Title IV (Financial Aid) eligibility. The finding was reported for distance education (DE) credit courses only. All three LACCD campuses selected for the audit were cited for "Incorrect Calculation of Return to Title IV Funds" because the exclusion dates, also known as the withdrawal dates, used for students enrolled in distance education (DE) courses were considered to be incorrect by the auditors.

In accordance with AP 5070 *Attendance*, all instructors must record attendance through census, and submit Mandatory Exclusion Roster(s) at census, even if no students are to be excluded. Instructors must also submit the Active Enrollment Roster before the last day to drop with a "W." Students who never attended ("no show"), or are no longer participating in the class as of census, must be excluded prior to the census date. Even though students are responsible for dropping themselves after census; instructors may make additional exclusions using the supplemental exclusion roster through the course mid-point.

Federal Audit Finding

Last year, Vasquez & Company conducted a student financial assistance audit at three LACCD Colleges for the 2020-21 aid year. The auditors noted in their findings that DE instructors incorrectly determined the student's exclusion dates for classes, which directly impacts students federal financial aid eligibility resulting in over/underpayments.

Title IV funds may be disbursed only towards the education of the students who can be proven to have been in attendance at the institution. In a distance education context, documenting that a student has logged into an online distance education platform or system is not sufficient, by itself, to demonstrate attendance by the student. To qualify as a last date of attendance for Return of Title IV purposes, an institution must demonstrate that a student participated in class or was otherwise engaged in an academically related activity, such as by contributing to an online discussion or initiating contact with a faculty member to ask a course-related question, or uploading an assignment or exam into the Canvas learning management system.

Remedy

To determine an estimated last date of attendance for a student in an online DE class, the instructor needs to review the student's performance in the online Canvas platform and enter into the student information system (SIS) exclusion roster the last date the student actively participated in the online class and engaged in an academically related activity to accurately reflect the student's exclusion date in the system.

To determine a student's last date of academic participation in Canvas, follow these steps:

1. On your Canvas shell home page, click the gray New Analytics button as shown below.

The screenshot shows the Canvas Faculty Canvas Resources page. The top navigation bar includes 'LACCD | Faculty Canvas Resources', 'Student View', and 'Immersive Reader'. The main content area features a large blue banner for 'LACCD | FACULTY CANVAS SUPPORT' with the LACC logo and several support buttons for Canvas, IT Help & Support, and East Los Angeles College. A red arrow points to the 'New Analytics' button in the right-hand sidebar menu, which also includes options like 'Import Existing Content', 'Import from Commons', 'Choose Home Page', 'View Course Stream', 'New Announcement', and 'View Course Notifications'.

2. Next, click on the Students tab.

The screenshot shows the 'Average Course Grade' page. The title is 'Average Course Grade' with a 'Settings' button. Below the title, it says 'As of Sep 27, 12:01 PM PDT'. The navigation bar includes 'Course Grade', 'Weekly Online Activity', 'Students', 'Reports', and 'Online Attendance' (marked as 'NEW'). Below the navigation bar, there is a dropdown menu for 'All Sections' and a search bar. The main content area shows a bar chart with a y-axis labeled 'Grade' ranging from 75% to 100%. The chart displays several data points, mostly clustered near 100%. Below the chart, there are checkboxes for 'Assignments', 'Discussions', and 'Quizzes', all of which are checked.

3. The date in the column titled Last Participation should be used as the date the student last actively participated in the online class.

Average Course Grade

Settings

As of Sep 27, 12:01 PM PDT

Course Grade Weekly Online Activity **Students** Reports Online Attendance NEW

Aug 21–Sep 25

All Sections Add a Section, Student

Students (67)	Grade	% On Time	Last Participation	Last Page View	Page Views	Participations
[Redacted]	94%	100%	Sep 21, 2022	Sep 26, 2022	1,412	56
[Redacted]	86%	75%	Aug 29, 2022	Sep 8, 2022	225	16
[Redacted]	81%	100%	Sep 16, 2022	Sep 24, 2022	450	56
[Redacted]	87%	100%	Sep 22, 2022	Sep 26, 2022	100	10

Exclusion Roster Deadlines

- Mandatory exclusion rosters are due eight (8) business days after census.
- Active Enrollment Rosters are due the day before the last day to drop with a “W.”

Effective Fall 2022, the Internal Audit Department (IAD) will conduct random, monthly compliance reviews by comparing the exclusion date entered on the mandatory, supplemental or active enrollment roster to the last date that the student actively participated in the online class. The Internal Auditor will contact the class instructor to request their permission to log in to the Canvas platform for the specific class to confirm that the student’s exclusion date entered into the system is the last date that the student actively participated in the online class. Only the student record selected for the audit check will be validated by the IAD. Any discrepancy found between the two dates will be reported back to the DE instructor for correction.

Compliance Recommendations

- 1) Students who are not in attendance at the first-class meeting are considered “no-shows” and the faculty may drop such persons in order to give their seats to non-registered students seeking to enroll. The exclusion date entered into the exclusion roster should be the day **before** the class begins.
- 2) Faculty members may withdraw a student from semester-length courses at any time for excessive absence through the 9th week of the Fall/Spring Semesters, and 60% point of

the class for Summer and courses less than a semester in length. The exclusion date must be the last date the student actively participated in an academically related activity.

- 3) As a guideline, absence is considered excessive if a student misses three class meetings or the equivalent of one week of class attendance, or according to absence guidelines as published in the course syllabus.

Your cooperation and assistance with responding to the audit finding for DE classes is critical for the Los Angeles Community College District to remain in goodstanding with the Department of Education.

Sincerely,

Los Angeles Community College Administration