


Executive Vice Chancellor
and University Provost

205 East 42nd Street
New York, NY 10017
Tel: 646-664-8075
Fax: 646-664-2967
academicaffairs@cuny.edu

MEMORANDUM

Date: October 20, 2017

To: The Presidents of the Colleges and Deans of the Schools

From: Executive Vice Chancellor and University Provost Vita Rabinowitz 

Subject: Verification of Student Enrollment Policy

This memorandum is being re-issued to inform you of revisions to the university-wide implementation of the uniform guidelines and procedures regarding verification of student enrollment and withdrawal in order to achieve compliance with Federal Title IV regulations, effective Fall 2009, passed by the University Board of Trustees at its June 22, 2009 meeting.

This memo supersedes prior memos on the subject. 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. The College must be able to document verification of enrollment in each course or participation in 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 or academically related activity (e.g. by submitting assignments, attending a required study group, academic conference or tutorial) for each course used to determine Title IV eligibility.

Academically related activities include, but are 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 school;
- participating in an online discussion about academic matter;
- engaging in an online academically related activity, or initiating contact with the instructor to ask a question about the academic subject studied in the course or ask a course-related question. ***Note: Logging into an online class is not sufficient, by itself, to demonstrate participation in an academically related activity by the student.***

A course for which the 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/census date of each term/session including winter and summer. **Faculty and instructors are required to indicate on the rosters verification of enrollment for students enrolled in the class. They must complete the official roster and submit it on or before one week after the census of 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 & participated at least once in the class indicated on this roster (i.e., began attending classes and/or pursuing the prescribed course work or is 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 participated in an academically related activity, i.e. have not begun attending. **Daily attendance rosters or grade books will not be required.**

Where the College cannot establish that the student began attendance or participated in an academically related activity, federal grants and loan funds need to be returned. **Federal regulations require that the College return federal funds no later than 30 days after the 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.

If there are any questions about this memorandum and the procedures please contact University Executive Registrar Vivek Upadhyay at Vivek.Upadhyay@cuny.edu.

Cc: Chancellor James B. Milliken
Chancellor's Cabinet
University Executive Registrar Vivek Upadhyay
University Executive Director of Enrollment Strategy and Management Clare Norton
Associate University Provost for Academic Affairs David Crook
Office of the University Controller
University Office of Student Financial Aid
The Chief Academic Officers of the Colleges
The Vice Presidents of the Colleges
The College Registrars
The College Directors of Student Financial Aid
The College Bursars