Who’s There?

Understanding “Attendance” in a Distance Learning Environment

Logan W. Key
Vanderbilt University
School of Nursing
Conference guidebook App

Download Guidebook (free) on your smartphone. You’ll have vital conference information plus good intel about nearby entertainment, dining, shopping, and tours in the palm of your hand! The app is available for download for iOS and Android devices. Once you download Guidebook, search for SACRAO 2015.

Wi-Fi Access

Wireless internet is complimentary in the convention center and Renaissance Hotel. You can upgrade to enhanced high speed at the Renaissance for an additional cost.
Distance-Learning Poll

• Courses

• Degree programs
Government

February 26, 2014

Report Highlights Risks of Student-Aid Fraud in Distance Education

By Kelly Field
Washington

State and federal regulators and college accreditors aren’t doing enough to guard against student-aid fraud in distance-education programs, according to an audit report released on Tuesday by the Education Department’s Office of Inspector General.
Title IV of the Higher Education Act Programs: Additional Safeguards Are Needed to Help Mitigate the Risks That Are Unique to the Distance Education Environment

FINAL AUDIT REPORT

ED-OIG/A07L0001
February 2014
Where we’re going...

- Relevant findings from the audit report
- What it means for us
- What we’re doing at my school
Objectives of the Audit

1. To determine whether U.S. Dept. of Education Title IV (a.k.a. financial aid) requirements properly mitigate against the risks inherent in distance education.

2. To determine whether the Dept. of Education, accrediting agencies, and states adequately monitor schools to assure compliance with Title IV requirements unique to distance education.
Why Does It Matter to Me?

• Schools bear the burden of verifying that the person who registers is the same person who takes the class.

• Schools bear the burden of determining withdrawal dates and adhering to the definition of attendance.
Why Does It Matter to Me?

• Because some findings revealed *shortcomings* in institutional record and registration *processes* and *procedures*.

• Because the report foreshadows regulatory changes and enhancements.
Evaluation of colleges and universities

• 8 different institutions (2 each) from:
  ➢ 4-year public
  ➢ 2-year public
  ➢ Private non-profit
  ➢ Proprietary
Evaluation of colleges and universities

Policies and procedures, including:

- Determining student eligibility
- Identifying and documenting attendance
- Verifying students’ identities
- Identifying “straw students”
Evaluation of colleges and universities

- Characteristics of distance education courses consistent with DoE’s definition
- Examined “cost of attendance” budgets for distance vs. residential programs.
Evaluation of colleges and universities

Random selection of 50 students at each institution who were:

• Enrolled *solely* in distance courses
• Received Title IV aid
• Earned no credits for that term (sometime between July 1, 2010, and June 30, 2011.)
Evaluation of colleges and universities

Did the institution

• Comply with Pell recalculations?
• Determine if students were “straw” students?
• Adequately document attendance at academically related activities?
“Key Risk Areas” (Based on Background)

• Verification of student’s identity
• Determination of a student’s academic attendance
• Calculation of cost of attendance for distance-based students
1. Regulations for verifying student identity should be strengthened.

2. Regulations defining “student attendance” should apply to Title IV eligibility and disbursement.

3. Cost of attendance components should be revised.

4. Improve monitoring by targeting “high-risk” areas.

5. Better Data is needed regarding distance education at each institution.
5 Findings

1. Regulations for verifying student identity should be strengthened.

2. Regulations defining “student attendance” should apply to Title IV eligibility and disbursement.

3. Cost of attendance components should be revised.

4. Improve monitoring by targeting “high-risk” areas.

5. Better Data is needed regarding distance education at each institution.
Finding No. 1
“Verifying Student Identity”

• IG found that current identity regulations are not sufficient to protect Title IV funds.
• “…log-ins and passcodes do not confirm identity.”
• Verification must occur before log-ins and passcodes are issued
Finding No. 1

“Verifying Student Identity”

• Recommended verification methods include:
  – High school diploma
  – Education transcripts
  – Admission test scores

• How do these mechanisms assure identity from afar?
Finding No. 2
“Defining Attendance”

• “Disbursement” regulations regarding attendance should mirror “withdrawal” regulations.”

• Issue better guidance on what evidence supports “attendance” and “last date of attendance.”
What is “Attendance” anyway?

Dept. of Education clarified this in 2011 with this non-exclusive list:

• Physically attending class
• Submitting an academic assignment
• Taking an exam, interactive tutorial or computer-assisted instruction
• Attending a study group assigned by the school
What is “Attendance” anyway?

• Participating in online discussion about academic matters
• Initiating contact with faculty members to ask a question about the academic subject studied in a course.
What is “Attendance” anyway?

All five possibilities may be used to determine “last date of attendance” but the institution must “document” attendance in the activity! [34 C.F.R. 668.22(c)(3)]
“Attendance” may not include

• Living in school housing
• Participating in school meal plan
• Logging in to an online class **without active participation**.
• Participating in academic counseling or advising.
Attendance Findings Up Close

Institutions did NOT consistently apply definition of academic attendance.

• All 8 considered used activity that was not compliant with “academic attendance.”

• 3 of 8 allowed faculty members to determine attendance on their own and faculty used unacceptable activity as “attendance.”
Attendance Findings Up Close

• Two institutions considered logging into the learning management system (LMS) to support attendance.
• One institution simply defined attendance as “accessing” a course via the LMS.
• Two institutions considered non-acceptable submissions to constitute attendance.
Attendance Findings Up Close

Insufficient documentation!

• None of the 8 retained adequate evidence of attendance.

• Schools must document
  1. That activity is academically related, and
  2. That student performed the activity.
What is “Attendance” anyway?

- Physically attending class
- Submitting an academic assignment
- Taking an exam, interactive tutorial or computer-assisted instruction
- Attending a study group assigned by the school
- Participating in online discussion about academic matters
- Initiating contact with faculty members to ask a question about the academic subject studied in a course.
So, what does “documentation” mean?
Finding No. 3
“Better Data”

Dept. of Ed. doesn’t collect “sufficient data specific to distance education.” For instance:

• Which students attended distance programs or courses.
• “Extent” to which institutions offer distance education.
Finding No. 3

“Better Data”

What does this mean to us? More Data!

- e.g. How many programs and courses are distance?
- e.g. What is a student’s “level of participation”? 100%?
“Action Items” for the Dept. of Education Include:

1. Develop regulations that require identity verification.

2. Require more frequent Title IV disbursements based on the timing of charges.

3. Use same attendance definitions to define what it means to “begin” attendance as are currently used to define withdrawal.
“Action Items” for the Dept. of Education Include:

4. Issue guidance to explain what is acceptable evidence of attendance.

5. Work with Congress to revise cost of attendance budgets to reflect the true cost for distance students.
Whither the definition of “distance education”?

Education that uses one or more specified technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously.

What about hybrid distribution?
What does ANY of this mean? For colleges and universities

• Define *types* of instruction:
  - By course?
  - By class section?

• Define “attendance” for distance courses (should meet or exceed Title IV definitions if Title IV funding is in play)

• Create robust attendance *documentation* procedures
What does ANY of this mean?

• Prepare for ramped up identity verification management
• Create robust attendance documentation procedures
• Just because we’re operating above board, doesn’t mean we’re insulated from “scrutiny”
What does ANY of this mean?

6 “Essentials” for registrars and other enrollment personnel

• Be alert for regulatory changes
• Be authoritative on regulatory *impact* and how well (poorly?) your institution is complying
• Support creation of better (more refined) data
What does ANY of this mean?

- Play an assertive role in process and documentation enhancement. Make sure new processes are **workable**.
- Be prepared to work closely with financial aid, institutional research, et al., on compliance.
- Stay in touch with your governmental relations staff and advocate for reasonable regulations.
What we’re doing at VUSN

Remote proctored exams (via web cam) for distance courses

• Identifies a student and records video, audio and screen capture to ensure identity

• Student holds up ID card; ID photo is matched with the person on camera
What we’re doing at VUSN

• Played an active role in shaping university definitions of class-level instruction modes (e.g. online, in-person, etc.) and course-level component types.
  e.g. “Lecture” courses can be online or in-person or a combination of both.

• Currently in the DRAFT stage of attendance definition for distance classes
What we’re doing at VUSN

• Began referring to federally-defined attendance activities on our withdrawal and leave of absence forms.
Questions and Observations?