November 10, 2021

MEMORANDUM

TO: Michael Bruno, UH Mānoa Provost
    Bonnie Irwin, UH Hilo Chancellor
    Maenette Benham, UH West O’ahu Chancellor
    Rachel Solemaas, Hawai‘i Community College Chancellor
    Karen Lee, Honolulu Community College Interim Chancellor
    Louise Pagotto, Kapi‘olani Community College Chancellor
    Joseph Daisy, Kaua‘i Community College Chancellor
    Carlos Peñaloza, Leeward Community College Chancellor
    Lui Hokoana, UH Maui College Chancellor
    Ardis Eschenberg, Windward Community College Chancellor

FROM: Debora Halbert
    Associate Vice President for Academic Programs and Policy

    Hae Okimoto
    Associate Vice President for Student Affairs

SUBJECT: Participation Verification

In July 2020, EP 7.209 Student Participation Verification in Coursework was approved and work began across the campuses to implement this process. This requires faculty to identify students who have not participated in their course by certifying students on their class rosters using the MyUH Final Grade Roster. Students who are identified as “No Shows” are administratively dropped from their class(es); have the course(s) removed from their record; and receive a 100% refund for the course(s) in question.

Participation Verification serves several purposes:

1. **Preserves Students’ Academic and Financial Records for Future Success**
   Students who register and then do not attend incur both a failing grade and a financial obligation for course(s) they do not take. The Participation Verification process prevents students from earning unnecessary failing grades and financial barriers--both of which impede students' future success.

2. **Preserves Instructors’ Course Success Rates**
   Students who register and then do not attend earn failing grades at the end of the semester. These failing grades are included in any course success rate
calculation. Administratively disenrolling No Show students from their class(es) allows a more accurate reflection of course success rates.

3. **Facilitates Institutional Compliance with Federal Financial Aid Regulations**

   Federal Student Aid (FSA) Title IV Financial Aid regulations require the University of Hawai‘i to verify students’ initial attendance and participation in post-secondary coursework for every course that makes up the student’s enrollment status. Participation Verification helps to ensure compliance with this federal requirement.

   For the UH System, approximately 56% of course sections were certified during the spring 2021 semester, whereas this semester the number of sections certified increased to 70%. Incomplete and inaccurate participation verification reporting negatively impacts our students and institutions.

   **Student Impact (if not identified as not participating at the beginning of the term):**

   - Students must return financial aid received that they were not eligible for, when identified (which could be at the end of the semester).
   - Receives a failing grade which impacts future financial aid eligibility and may result in academic sanctions (e.g., academic probation, suspension, dismissal, etc.).
   - Impacts re-enrollment (students often withdraw rather than face the financial burden)

   **Institutional Impact:**

   - Inconsistency in reporting is a compliance issue for Financial Aid and Records Offices and has financial implications
   - This inconsistency creates increased potential for further inquiry and program reviews by the US Department of Education
   - It also creates equity issues for our students--i.e., our institutions are treating students differently and are affording the opportunity for improved academic and financial records for some and not others.

   We need your assistance with increasing the number of course sections certified with a goal of 100% compliance in the upcoming semesters.
Participation Verification Section and Student Certification Information for Fall 2021  
(POT 1, D51, D52, D53)*

<table>
<thead>
<tr>
<th>Campus</th>
<th>Total Sections Certified</th>
<th>Total Number of Active Sections (with enrollment)</th>
<th>POT Start Date of 8/23/2021</th>
<th>Percentage of Total Sections Certified</th>
<th>Total Number of Students Certified (Duplicated)</th>
<th>Total Number of Students NOT Certified (Duplicated)</th>
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</table>

*There were over 280 parts of term (POT) throughout the UH System in fall 2021. An overwhelming majority of class sections are in the four POT which were included in the participation verification process this fall, but moving forward all POT should follow this process.

**To be more effective, (if you have not already done so), we recommend that your campus form a cross functional Participation Verification committee inclusive of faculty champions who can provide feedback to enhance this process.**

The System Office of Student Affairs and ITS are working diligently to make this process as easy for faculty as possible, but your assistance is needed to increase the number of sections certified. We are asking that you communicate with your faculty stressing the importance of their compliance with this process. I am offering the following resources for your convenience with anticipated gratitude for your support.
SAMPLE EMAIL:

Aloha Faculty,

Student success depends on students fully participating in their courses. Incomplete or inaccurate participation verification reporting negatively impacts our students. We have a kuleana to our students to do better. Many erroneously receive financial aid to pay for classes they never attended and must then repay this money or they incur a financial obligation to the University. Moreover, they earn failing grades in your classes which can place them on academic probation and negatively impact their future financial aid eligibility.

By Federal regulation, the University of Hawai‘i is required to comply with Federal Student aid (FSA) Title IV financial aid regulations regarding verification of students’ initial attendance and participation in post-secondary coursework. Last fall, INSERT CAMPUS NAME certified INSERT PERCENTAGE FROM CHART of class section. Mahalo to everyone who helped us achieve this level of certification.

From an institutional perspective, failure to certify your class creates compliance issues with the U.S. Department of Education which in turn could mean financial repercussions for our campus. This is in addition to the increased potential for further inquiry and program reviews with the potential for losing access to federal financial aid for the campus. Lastly, the grades earned by the students inaccurately decrease your course success rates.

This semester we will be implementing the participation verification process for all class sections. You will be receiving reminders and information from the UH System as well as from your academic leadership. It is imperative that you support this requirement and certify the initial attendance for all of your students.

I genuinely appreciate your part in supporting the success of our students.

Attachment
Participation Verification and Student Success

**FACULTY**

**Outcomes**
- Increased student course completion rates
- Increased overall graduation rates
- Reduced Student Debt
- Assurance that our campus is meeting this Federal mandate

**Responsibilities**
- Understand your critical role in the process
- Adhere to all deadlines

**Actions**
- Identify non-participating students
- Assign an ‘x’ grade to non-participating students and certify your class on your MyUH grade roster

**STUDENT**

**Banner Student Info System**
- MyUH Grade Roster

**Registration**

**Financial Aid**

**Star**

**Laulima**