

# AD HOC COMMITTEE ON ACADEMIC ENGAGEMENT

## DRAFT REPORT

April 8, 2019

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### COMMITTEE CHARGE

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The SC creates the ad-hoc Committee on Academic Engagement for the purposes of analyzing the best practices for implementation of Title IV reporting on academic engagement and presenting recommendations to the Senate Council meeting on April 1, being charged to address the following issues:

1. the apparent discrepancy between Senate Rules and Federal Regulations (Title IV) on academic engagement;
2. the necessity for universal removal of students reported for non-engagement from class rolls in the third week of the semester;
3. whether the terms of asynchronous online courses match the implied expectations for academic engagement in the third week of the semester;
4. whether there is disproportionate penalty for students receiving federal aid;
5. use of the “N” grade as a possible mechanism in reporting and possible extension of its availability from the beginning to the end of the semester, and
6. other issues.

The membership will be comprised of the chairs (or the chair’s designee) of the following Senate committees: on Admissions and Academic Standards, Academic Planning and Priorities, Rules and Elections, Diversity and Inclusion, and Distance Learning and e-Learning, and a student nominated by the Student Government Association (SGA) president, and one ex officio nonvoting representative from the Registrar’s office, and one ex officio nonvoting representative from Financial Aid, and Abigail Firey participating as an ex officio nonvoting resource.

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### ATTENDING COMMITTEE MEMBERS

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1. [Roger Brown](#) (CAFE, Senate Committee on Distance Learning and e-Learning)
2. [Alyssa Eckman](#) (CCI, Senate Academic Planning and Priorities Committee)
3. [Herman Ferrell](#) (Fine Arts, Senate Admissions and Academic Standards Committee)
4. [Abigail Firey](#) (A&S, past Senate Council member)
5. [Beth Guiton](#) (A&S, Senate Advisory Committee on Diversity and Inclusion)
6. [Davy Jones](#) (Medicine, Senate Rules and Elections Committee)
7. [Kim Taylor](#) (Registrar)
8. [Nimmi Wiggins](#) (Director, Office of Student Financial Aid and Scholarships)

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### CURRENT PROCESSES

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The current procedures for administrative implementation of the federal Title IV requirements are subject to additional college-specific procedures. The committee did not consider any of the particular college-level procedures. For the current trial period (i.e., the 2018/2019 academic year), the general, University-wide administrative procedures are:

1. **All instructors create** a Title IV engagement requirement that all students in each of their courses must complete during a designated one week monitoring period that starts the day after the last day to add a course or an equivalent time period for courses with irregular calendars.
2. **All instructors monitor** all of their enrolled students for evidence of Title IV engagement during the designated monitoring period.

3. During a one week period immediately following the designated monitoring period or an equivalent time period for courses with irregular calendars, **all instructors report** via the MyUK faculty webpage all students who did not satisfy the Title IV engagement requirement. The reporting portal is currently similar to but different than the portal used for reporting midterm and final grades. The reporting requires **instructors to log** on to MyUK, **instructors navigate** to the course roll for each course, and **instructors click** once on each student in the course who was not engaged or once to indicate all students in the course were engaged.
4. As soon as an instructor submits a report indicating that a student was not engaged as required during the designated monitoring period, the **Registrar sends an email** to the student, the course instructor, and the student's academic advisor notifying them of the student's "not engaged" status in a course.
5. Forty-eight (48) hours after a student has been reported as not engaged in a course and if the Registrar receives no email to correct the report, the **Registrar removes** the reported student from the course roll without regard to whether the student was receiving any federal financial aid (i.e., "self-pay" students and federal financial aid recipients alike).
6. Upon removal of a student who was not engaged in a course, the **Registrar adjusts** each student's tuition bill as appropriate, and the Director of the **Financial Aid Office adjusts** the student's financial aid award as appropriate.
7. If students are removed from courses by mistake, course **instructors email** the Registrar about the error, and the **Registrar re-enrolls** those students in the courses they were removed from by mistake.

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## IMPACT OF CURRENT ADMINISTRATIVE PROCEDURES (2018/2019)

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(PENDING)

1. Total enrollees (approximately) who were reported
2. Total number of individual class sections requested to complete reports (i.e., number of classes reported on)
3. Number of class sections that did not report as required (i.e., no report)
4. Number of students that were removed from courses
5. Number of students that needed to be re-enrolled in courses due to incorrect removal

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## RECOMMENDATIONS

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The [Ad Hoc Committee on Academic Engagement](#) met five times between February 2, 2019 to March 29, 2019. The committee makes 16 recommendations related to 11 different concerns:

1. Need to Clarify Data Integrity Expectations and Responsibilities
2. Need for a New Senate Rule
3. Need for All Instructors to Implement an Early Engagement Requirement
4. Need to Implement Early Engagement Requirement Fairly and Without Discrimination
5. Need to Create Model Syllabus Language
6. Need to Address Academic Calendar Issues
7. Need to Clarify that Implementation of the Early Engagement Requirement is Academic Policy
8. Need to Improve Email to Students Notifying Them of Imminent Removal from a Course
9. Need to Minimize Cost of Early Engagement Policies
10. Need to Engage Help from Academic Advisors
11. Need to Create New Grade Option to Report Early Engagement

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## **CONCERN 1: Need to Clarify Data Integrity Expectations and Responsibilities**

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Data quality is a function of the effort given to gather and manage the data. Production of higher quality data requires more effort. It is not clear what the University's data integrity standards are under Title IV or what penalties instructors face if they cause data gathering or management errors. As a result, instructors do not know how much effort they should expend—and how much effort planning allowance (i.e., DOE) if any they should negotiate—to gather and manage data as expected under Title IV requirements.

At the May 14, 2018 Senate Council [meeting](#), the Provost stated, "If UK were audited and discovered to not be completely in compliance with the federal requirements, it could cost the University millions of dollars in fines." This statement suggests that the data quality expectations could be very high and penalties for individual instructors could be very severe. A zero-tolerance policy for Title IV reporting errors would demand proportionately more effort by instructors.

The committee noted anecdotal instances where seemingly minor data mismanagement in other university settings have resulted in unexpected penalties (e.g., patient charting errors caused the federal government to be charged several hundred dollars by mistake prompting the University to initiate tenure revocation hearings).

Faculty members require clarity on how to view the Title IV monitoring and reporting requirements in light of, for instance:

### **KRS 164.230 Removal of Professors, Officers and Employees**

*The board of trustees has full power to suspend or remove any of the officers, teachers, professors or agents that it is authorized to appoint, but no president, professor or teacher shall be removed except for incompetency, neglect of or refusal to perform his duty, or for immoral conduct. A president, professor or teacher shall not be removed until after ten (10) days' notice in writing, stating the nature of the charges preferred, and after an opportunity has been given him to make defense before the board by counsel or otherwise and to introduce testimony which shall be heard and determined by the board.*

and in light of:

### **GR XIV.B.15 Compliance Responsibilities**

#### *University Members*

*b. University Members University members shall take appropriate measures to prevent, detect, and report compliance violations or suspected violations. University members shall, acting in good faith, report suspected compliance violations through the standard chain of command, through one's supervisor, or, if not appropriate because of that individual's potential involvement, to a higher level of management, to Human Resources, to a compliance officer or to the University Ethics Committee. (See AR 1:7) It is the responsibility of all University members to know and abide by rules, laws, regulations, contracts and University policies and procedures that are applicable to the work or activity undertaken, including, but not limited to the following:*

- *Federal laws, regulations, and policies;*
- *Kentucky Revised Statutes (KRS) and Kentucky Administrative Regulations (KAR);*
- *University and unit-level policies and procedures including, but not limited to the Governing Regulations (GR), Administrative Regulations (AR), Human Resources Policy and Procedures (HRP&P), Business Procedures Manual (BPM), and Rules of the University Senate;*
- *Contract, grant, and donor stipulations; and*
- *Accreditation requirements.*

**Recommendation 1:** UK administration should clarify what are its data integrity expectations and what are the penalties, if any, if individual instructors do not or mistakenly report Title IV data.

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## **CONCERN 2: Need for a New Senate Rule**

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At the May 14, 2018 Senate Council [meeting](#), the question arose whether the proposed Title IV implementation plan required changing the Senate Rules and the "Vice Chair commented that as she saw the situation, no changes to Senate Rule would be needed." Our committee disagrees.

Senate Rules do not define the word "attendance." However, the Senate Rules do define the word "absence" as a "failure to participate in a required interaction at or by a specified date and time" ([SR 9.1](#)). The committee infers from the Senate definition of "absence" ([SR 9.1](#)) that the word "attendance" means 'participation in a required interaction at or by a specified date and time'. The Senate defines "absence" as a "failure to participate in a required interaction at or by a specified date and time" where "required interactions" are "are interactions that, if not completed at or by their specified date and time, would penalize a student in a course." The committee believes that the implied Senate definition of "attendance" is essentially equivalent to the Title IV definition of required engagement in an academic activity ([here](#)).

While [SR 5.2.4.1](#) says that "[e]ach instructor shall determine his/her policy regarding... attendance in class...", this grant of freedom to instructors to determine their course attendance policies is absolute. One of the 10 functions of the University Senate under [GR IV.C.1](#) is to "[d]etermine the broad academic policies of the University, including the similar academic policies that may be made necessary by governmental or accreditation agencies, and make rules to implement these policies." The Senate Rules must bow to governmental or accreditation agency requirements, but the Senate gets to determine how that occurs. In like fashion, instructor freedom to set attendance policies in individual courses is limited by decisions by higher level faculty bodies, including rules approved by unit faculty, college faculty, or the University Senate.

The committee concludes that the current Title IV implementation plan requires all instructors to require attendance, and therefore a Senate Rule is needed to except from the general freedom granted in SR 5.2.4.1 the specific attendance requirements under Title IV.

**Recommendation 2:** Create a new Senate Rule that implements or otherwise satisfies the Title IV early engagement requirements.

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### **CONCERN 3: Need for All Instructors to Implement an Early Engagement Requirement**

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As noted above, Senate Rules do not define the word "attendance," but it may be inferred from the Senate definition of "absence" ([SR 9.1](#)) that the word "attendance" means 'participation in a required interaction at or by a specified date and time'. The Senate defines "absence" as a "failure to participate in a required interaction at or by a specified date and time" where "required interactions" are "are interactions that, if not completed at or by their specified date and time, would penalize a student in a course." The committee believes that the implied Senate definition of "attendance" is essentially equivalent to the Title IV definition of required engagement in an academic activity ([here](#)).

Given this equivalency and given the Title IV requirement, it follows that all instructors must now require attendance, in the above meaning.

If attendance is required in a course, Senate Rules say that course policies associated with those attendance requirements must be included in the syllabus according to [SR 5.2.4.1](#) (i.e., course policies regarding attendance in class "shall be presented in writing to each class at its first or second meeting").

**Recommendation 3:** Add to the Senate "[Required Components of Course Syllabi](#)" website a requirement that syllabi must state an attendance policy that incorporates at minimum the early engagement requirement (Title IV).

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### **CONCERN 4: Need to Implement Early Engagement Requirement Fairly and Without Discrimination**

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The committee considered four fairness issues.

One, it might be unfair for the University to remove a student (e.g., a "self-pay" student) from a course if there is no mandated reasons (e.g., if the student does not receive federal financial aid and does not therefore fall under the

Title IV attendance monitoring requirements). So, maybe self-pay students should be treated differently than students receiving federal financial aid. This rationale favors monitoring only current financial aid recipients.

Two, it might be unfair for the University not to remove a student from a course if the student shows no signs of attending that course (e.g., a student may have mistakenly enrolled in a course and continued enrollment in that course may result in unnecessary tuition charges and/or negative grade consequences that could have been avoided). So, maybe self-pay students should benefit from corrective actions under Title IV the same as students receiving federal financial aid. This rationale favors monitoring all students.

Three, it might be unfair not to document and report attendance of all students (including “self-pay” students) since many students elect to apply for federal financial aid mid-semester for their current semester course load. If attendance cannot be confirmed for a student’s current courses, that student would not be eligible for federal financial aid for that semester. This rationale favors monitoring all students.

Four, it might be unfair for the University to remove from courses only those students who by choice or necessity receive federal financial aid (i.e., students who are likely more financially disadvantaged). This rationale favors monitoring all students.

**Recommendation 4:** The committee recommends for fairness and other reasons that all students should be monitored and data reported for all students not just those students for whom Title IV monitoring is most immediately required.

The committee also considered the advantages of characterizing the requirement as an “early engagement requirement” rather than merely as a Title IV requirement. A general early engagement requirement would likely shutter potential claims from some students (e.g., “self-pay” students) that they were inappropriately removed from a course when Title IV did not specifically apply to them. An “early engagement requirement” can fairly apply to everyone. The committee noted that pedagogical research seems to suggest a strong positive correlation between student engagement in their courses and student learning, student satisfaction, etc. (e.g., George D. Kuh, "[What Student Affairs Professionals Need to Know About Student Engagement](#)", *Journal of College Student Development*, 2009).

Additionally, committee members agreed that it would be best to characterize the requirement as an early engagement requirement in part to increase buy in from instructors and signal to students that UK values academic engagement. The early engagement requirement makes students accountable as well. This approach appears to be one originally endorsed/proposed by the Provost as well at the May 14, 2018 Senate Council meeting.

**Recommendation 5:** The committee recommends that the new Senate Rule generalize the requirement as an “early engagement requirement” and that the Senate Council point to research supporting the same rather than identifying this merely as a Title IV requirement.

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#### **CONCERN 5: Need to Create Model Syllabus Language**

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The committee noted that instructors have many ways to comply with the Title IV early engagement requirements, but a sample of those possibilities could be useful to include in this committee’s report. Model syllabus language describing assignments and attendance requirements could be shared on the Senate Council website (e.g., under the syllabi guidelines page). For example:

*Early Engagement Requirement. The instructor of this course believes that early and frequent engagement in the course is critical for student success. Evidence shows that students earn better grades and report more satisfaction when they engage more often with the course content, with their fellow students, and with their instructor. In this course, many kinds of engagement occur via Canvas. To support student success and to comply with certain federal guidelines, all students in this course are required to complete a course survey on Canvas no later than 5:00PM on Wednesday, January 23, 2019. This assignment is worth zero points. However, if you do not complete this assignment by the due date and time, you will be dropped from the course.*

**Recommendation 6:** Gather and publish on the Senate Council website example options of model syllabus language for how instructors might satisfy the Title IV early engagement requirement and describe the associated attendance policy in the syllabus.

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### **CONCERN 6: Need to Address Academic Calendar Issues**

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The committee considered how clearly the Title IV monitoring and reporting times would map onto the great variety of courses schedules. In addition to standard fall and spring term course, there are also part-of-term courses, asynchronous online courses, and summer term courses that have different start/end dates. Kim clarified that every course has a designated calendar in MyUK under the “Faculty Services” tab.

The screenshot shows the MyUK Faculty Services interface. At the top, there is a navigation bar with the MyUK logo and user information (Roger Brown, Log Off). Below this is a menu with various service categories. The main content area displays details for course AEC 305 (Food & Agricultural Marketing Principles), including a search bar, a dropdown for the selected term (Fall Semester 2019), and a section for Section 002. The section details include 3.0 credits, a Wednesday 3:00 pm - 5:30 pm lecture in Agricultural Science Building North Rm N12 LEC, and 0 enrolled students. A message states "There are no students in this section". On the right side, there are links for printing and exporting to Excel, and a "Windows" section listing key dates: Attendance Verification (9/10/2019 - 9/16/2019), Midterm Grading (10/14/2019 - 10/25/2019), and Final Grading (12/9/2019 - 12/23/2019). A "Deadlines" section lists various administrative deadlines from 9/3/2019 to 11/6/2019. Red arrows in the image point to the "Faculty Services" tab, the search bar, the "Selected term" dropdown, and the "Attendance Verification" date range.

For standard courses in the fall and spring terms, these dates are also identified in the regular academic calendar for those terms on the UK Registrar’s website. Committee members also noted that Canvas shells are also created for each course at UK, providing familiar and official ways for instructors to assign and assess students’ early engagement in any course.

The committee noted that correspondence courses have highly flexible start dates and may return to UK as course options. Nimmi clarified that such courses are not eligible for Federal Financial Aid until after a student completes such a course. Therefore, the Title IV academic engagement requirement does not apply to or is inherently satisfied in the case of correspondence courses.

However, the committee recognizes that missing from these calendar dates are the reporting periods. For the standard fall/spring terms, the monitoring period officially begins just after the "Last day to add a class" and runs for one week. Technically, students may be monitored for early engagement beginning on the "First day of classes" except that the period must also include a required engagement activity and additional monitoring during the designated monitoring period. There is nothing explicit in the University calendar that indicates when the designated monitoring and reporting periods start and end.

**Recommendation 7:** Include in the academic calendar for each course on MyUK and in the standard fall and spring term calendars on the UK Registrar’s website specific dates for both the “Monitoring” and “Reporting” periods.

**Recommendation 8:** Raise awareness among instructors that the course-specific calendar dates are available on the UK Registrar’s website and in MyUK.

The UK Registrar's academic calendar is growing in the number of items it includes that require action by students and instructors.

**Recommendation 9:** Distinguish in the UK Registrar's academic calendar those items that require instructor action versus those items that require student action.

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**CONCERN 7: Need to Clarify that Implementation of the Early Engagement Requirement is Academic Policy**

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Individual faculty members, subject to higher level faculty voting bodies (e.g., unit faculty, college faculty councils, the University Senate, etc.), control academic policy. The Title IV requirements and any similar early engagement requirements are academic policies. The 2018/2019 trial administrative implementation of the Title IV monitoring/reporting requirements (see [May 14, 2018](#) Senate Council meeting minutes) may have left uncertain the role of the college faculty bodies.

**Recommendation 10:** Clarify with the University administration that the Title IV or similar early engagement policies are academic policies and, as such, shall be designed and implemented only with the approval of the corresponding faculty body.

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**CONCERN 8: Need to Improve Email to Students Notifying Them of Imminent Removal from a Course**

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Many students do not read all of their emails. As such, it will be beneficial to make important emails about removal from a course easier for students to recognize.

**Recommendation 11:** Personalize the warning email that goes to students about their pending removal from a course (e.g., using Salesforce with "Dear [name of student]" rather than "Dear Student").

Students may read their emails and may understand that their removal from a course is imminent due to their non-engagement, but these students may also have reasons other than mere neglect for not being engaged (e.g., short-term financial barriers). Many support resources exist on campus to help students.

**Recommendation 12:** Identify and reference support resources, including the student's academic advisor and course instructor, in the email that goes to students about their pending removal from a course (e.g., "If financial barriers are keeping you from participating in this course as prescribed, please let your academic advisor and course instructor know.").

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**CONCERN 9: Need to Minimize Cost of Early Engagement Policies**

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The cost of attending UK is a major expense for students and includes tuition, housing, board, and textbooks. Even with financial assistance, many students struggle to manage their personal finances on a month-to-month and day-to-day basis. Some early engagement policies may require expenditures that students are not prepared to make (e.g., an assignment that requires purchase of an online textbook).

**Recommendation 13:** Instructors should be aware of costs associated with their choice of early engagement policies and not impose on students early engagement policies that are unnecessarily costly if equivalent but less costly alternatives exist (e.g., an assignment that require purchase of an online textbook).

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**CONCERN 10: Need to Engage Help of Academic Advisors**

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The requirement to monitor and report students and remove them from courses when they are not engaged early the term is a new academic policy. Additional efforts are needed to educate and inform students about this requirement and its consequences.

**Recommendation 14:** Academic advisors should be better informed about this new academic policy (e.g., through UK's independent [Advising Network](#)), and academic advisors should be encouraged to communicate with their advisees about this new policy during their regular advising meetings.

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### **CONCERN 11: Need to Create New Grade Option to Report Early Engagement**

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The committee discussed using the “N” grade (for “Never Attended”) for reporting student completion of the early engagement requirement. While that particular grade rejected, the committee identified many advantages of merging the early engagement requirement with the existing grade reporting processes and with the overall concept of a “grade” rather than an additional non-grade “report”.

Students and instructors are already familiar with the current grade reporting system on MyUK and with where midterm grades appear online.

**Recommendation 15:** Set up the early engagement requirement as an additional grade reporting option in MyUK (other than “Midterm” grade and “Final Grade”). Call this grade the “Engagement Grade”. Report the engagement grade (“Engaged” or “Not Engaged”) online in every place where midterm grades are currently reported. (Note: Midterm grades do not appear on students’ transcripts.) When instructors access the grade reporting system online to report engagement grades for their students, auto-populate all fields for all students with the “Engaged” grade option; this will only require instructors to change the grade to “Not Engaged” for a minority of students. The grade reporting option in MyUK would open for instructors when appropriate (i.e., the two week period immediately following the last day to add a course), and instructors could use the existing “change grade” feature to make changes to students’ engagement grade within the 48-hour period of time following their initial report. After 48 hours, the Registrar will continue to remove “Not Engaged” students from the course roll, and so instructors will not see removed students in the grade system. After this 48-hour window, instructors would need to email the Registrar to change a “Not Engaged” grade to “Engaged” and to re-enroll a student in a course.

Students, academic advisors, and instructors are already familiar with the “[Academic Alert](#)” system. Students, academic advisors, and other student support service groups should know when a student has not engaged in a course early in the term and, thus, that the student is scheduled to be removed from the course in 48 hours. If an academic advisor knows, for example, that a student is in the hospital, the advisor could, upon being alerted, inform the students’ instructors that the student is not engaged in the course for a reason that qualifies as a University-approved absence and that the student should not be reported as “Not Engaged”.

**Recommendation 16:** As soon as practical (e.g., immediately) after an instructor submits a grade report showing that a student is “Not Engaged”, send an automatic “Academic Alert” notifying the default persons (e.g., the student, the student’s academic advisor, and others). Inquire from other campus student support groups (e.g., [UK CARES](#)) if they wish to receive these automatic notices and, if so, arrange for them to receive them as well.

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### **APPENDIX A: Example Language to Communicate with Instructors about the Early Engagement Requirement**

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*It is the intention of the university to implement Title IV in such a way as to use the federally mandated reporting requirement as an opportunity to identify all students in need of early intervention and support, and direct them towards university resources aimed to initiate and enable rapid engagement. As such, UK sees early engagement reporting as an essential strategy to empower all students most in need of university resources and support, to achieve academic success. Early engagement reporting has been designed to impose the minimum in administrative burden on faculty*



while meeting the federal mandate. Submission of a “non-engagement” grade will, however, trigger an automatic academic alert, in addition to a 48-hour warning to the student that they will be removed from the course (as required by mandate), enabling advising services and academic support staff to attempt contact with the student to prevent removal from the course, and to bring to their attention such university support services as may be necessary.

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## **APPENDIX B: Example Assignments to Implement the Early Engagement Requirement**

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- The instructor could require students to make a short post or respond to another student’s post in a discussion forum on Canvas.
- The instructor could require students to submit questions about the assigned readings.
- The instructor could give an ungraded practice quiz or ungraded survey through Canvas during the designated monitoring period. Click [here](#) to see an example of how an ungraded survey might be structured in Canvas.

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## **APPENDIX C: Example Survey Questions to Solicit Instructor Feedback about Current Procedures**

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**(1) In which college is your primary appointment?**

[drop down]

**(2) Did you change any part of any course you teach (e.g., attendance policy, assignments, etc.) as a result of the new Title IV early engagement policy?**

[Yes]

[No]

[Choose not to answer]

**(3) If [No], skip to (3), otherwise --> Do you believe the changes you made in your course(s) had any benefits to your students beyond compliance with the Title IV requirements? Please explain.**

[Open response]

[Choose not to answer]

**(4) Did you report any students as non-engaged during the academic year (2019/2019)?**

[Yes]

[No]

[Choose not to answer]

**(5) Did you encounter any challenges or problems implementing the new Title IV early engagement policy? Please explain.**

[Open response]

[Choose not to answer]

**(6) What level of students did you teach mostly this academic year (2018/2019)?**

[Undergraduate]

[Graduate or Professional]

[Both]

[Choose not to answer]

**(7) What type of teaching did you do mostly this academic year (2018/2019)?**

[Face-to-Face]

[Distance Learning]

[Both]

[Choose not to answer]