



Robert L. Barchi, President

April 20, 2017

Mr. Kenneth Swalagin  
University Senate  
Rutgers, The State University of New Jersey  
ASB III, Suite 110  
Cook/Douglass Campus

Dear Mr. Swalagin. *Ken*

I am writing in response to the University Senate's April 2016 report and recommendations on Charge S-1504, Determination of Student Participation. I thank the members of the Senate's Instruction, Curricula and Advising Committee for their work on this important compliance issue. I appreciate the Committee's guidance as we seek to develop a systematic approach to meeting Title IV reporting requirements related to class participation for students receiving federal financial aid. Failure to comply with these requirements may result in the loss of University federal funding and/or substantial federal fines.

As the committee noted, the U.S. Department of Education (ED) places the burden of documenting student participation in each of their courses with the University. The intent is to identify those students who appear on the course roster, but who have had no engagement of any kind with the instructor or the course. In defining what constitutes "participatory academic activity," the ED provides a broad array of examples, most of which are far less rigorous than what most instructors would define as adequate academic participation. Included are activities such as attending one class, submitting an assignment or taking an exam, attending a study group, participating in an online class discussion, or contacting the instructor with a question.

In an attempt to make this reporting as easy as possible for both instructors and the University, the Committee recommended that we tie this reporting requirement to the existing Warning Grades system by adding an NP (no participation) warning option to the system. However, when looking at the participation figures for the Warning Rosters, the Registrar reports that (except for Camden where submission is required) Warning Rosters are being submitted for only approximately 22% of the eligible course sections, and that the vast majority of warning rosters submitted are for undergraduate courses.

Given the culture change that would be required for full compliance under the warning system model, along with the concern that the co-mingling of this non-academic reporting with the academic judgment expressed through the warning system might be confusing for instructors, we have decided that developing an entirely separate system for reporting this information would be preferable. This allows us to identify students whose financial aid is at risk earlier and to initiate follow-up with them by the Office of Financial Aid about taking corrective action or returning funds in a timely manner.

The new system will require instructors to identify non-participating students shortly after the close of the add-drop period. Implementation of this new participation documentation will require faculty cooperation. We will need to communicate regularly with faculty about why this is being done, and the risk to students and the University if it is not done. Reminders will need to be sent every semester to ensure that new faculty and PTLs understand the importance of the effort and the procedures for complying. Students will likewise need to be informed about what they need to do in order to not put their financial aid at risk. I am asking Senior Vice President Barbara Lee to take responsibility for notifying the university community of this new requirement and monitoring University compliance with it.

In addition, of course, initiating a new system to determine student participation as defined by ED will require several months of programming and testing by the Office of Information Technology to develop the new reporting system and ensure that it is compatible with our various LMS platforms. I am told that there is no significant difference between the time and effort needed to modify the Warning Rosters system and that to develop an entirely separate system. It is my hope that this work will be completed in time to allow for a full rollout of the new system in the spring 2018 semester.

I applaud the members of the University Senate Instruction, Curricula and Advising Committee for the useful information and thoughtful recommendations they have provided to assist the University. Implementation of any such broad-based new system requires coordination and cooperation across the entire university, and I appreciate the multiple dimensions of this application that the committee explored.

Sincerely,



Robert Barchi

c: Barbara A. Lee, Senior Vice President for Academic Affairs  
Richard L. Edwards, Chancellor, Rutgers University–New Brunswick  
Brian L. Strom, Chancellor, Rutgers Biomedical and Health Sciences  
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