EL PASO COMMUNITY COLLEGE PROCEDURE

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EBA-2 **Compliance with Title IV Requirements**

APPROVED: December 18, 2025 **REVISED**:
Year of last review: 2025
AUTHORIZING BOARD POLICY: EBA

Classification: Institutional
Responsible Vice President or Associate Vice President: Vice President of Instruction and Workforce Education
Designated contact: Associate Vice President of Instruction and Student Success

OBJECTIVE: To establish El Paso Community College's processes to comply with Title IV requirements.

PROCEDURE:

I. General Provisions

A. Definitions

1. Title IV: From the Higher Education Act (HEA) of 1965, Title IV covers the administration of U.S. federal student financial aid programs.

2. Attendance in Online Courses: Regular and substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course. This may include but is not limited to the faculty: monitoring the student's academic engagement and success, promptly and proactively engaging in substantive interaction with the student and providing documentation of attendance when requested by the student or the college.

B. Purpose

1. This procedure responds to requirements from Title IV, U.S. Department of Education, and related rules and regulations of the following agencies: U.S. Department of Veterans Affairs (DVA), Texas Higher Education Coordinating Board (THECB), the Southern Association of Colleges and Schools, Commission on Colleges (SACSCOC), and The National Council for State Authorization Reciprocity Agreements (NC-SARA).

2. Because "Title IV funds may be expended only towards the education of the students who can be proved to have been in attendance at the school," processes must be established to monitor and document attendance in online classes.

3. For Department of Veterans Affairs (DVA) purposes, recording of attendance will be subject to the following Attendance Policy: Students using veterans' benefits to attend EPCC will have attendance monitored until the time the student drops, graduates, or completes the program. Unsatisfactory attendance will be reported to the DVA even if the VA student has completed the required number of hours and no refund is due to the student and/or refund sources. Therefore, the attendance policy (being absent 20% of the total program and/or being absent five [5] consecutive days) will apply throughout the student's stay in school.

II. Process

The following process provides guidance to faculty to comply with Title IV requirements to demonstrate and document attendance in **online and the online portions of hybrid classes**.

A. Self-Service Banner will be used to track attendance. Attendance, as determined through the student's regular and substantive interaction in the course, will be tracked on the first day of class, census, drop date, and midterm.

B. The following best practices will help support and document regular and substantive interaction:

The EPCCCD does not discriminate on the basis of race, color, national origin, religion, sex, age, disability or veteran status.

1. Course Design: Weekly Content and Activities

    a. Weekly access to a variety of engaging resources to present content, support learning and collaboration, and facilitate regular and substantive interaction with the student.

    b. Weekly learning activities in the form of formative (assignments, discussions, quizzes, etc.) or summative assessments (chapter or unit tests, projects) are assigned and submitted. Student completion of these activities is documented in the learning management system gradebook.

    c. Evidence of activities completed on 3rd-party platforms (publisher sites) is visible in the learning management system grade book.

2. Evident Student Interaction

    a. Easy to find regular and substantive instructor-to-student expectations and predictable/scheduled interactions appropriate for the course length and structure demonstrated in the course.

    b. Weekly announcements; timely, tangible, and actionable feedback on graded course work; and timely response to student communications all evident in the course.

3. Students' Completion of Academic Tasks

    a. Submitting an academic assignment;

    b. Taking or submitting an exam;

    c. Posting by a student showing the student's participation in an online study group that is assigned by the instructor or attending a study group that is assigned by the instructor; or

    d. Participating in or posting by a student in a discussion forum showing the student's participation in an online discussion about an academic matter.

C. For purposes of complying with this procedure, attendance in **hybrid** courses will include the best practices described above for the course's online portion and attendance in the course's face-to-face portion.

D. Attending a class in-person or virtually where there is an opportunity for direct interaction between the instructor and students (students must be present and visible for the entire class with their video camera turned on when attending virtually) can also serve as documenting attendance.

III. Dual Credit

College courses for dual credit must follow the same guidelines set by the institution and by the disciplines to grant college credit. Therefore, whatever process is established for EPCC faculty to follow, will also be followed by Dual Credit/ECHS/P-TECH faculty.

IV. Related EPCC Procedures:

- ECC-1 *Criteria for Determining Course Pursuit*
- ECC-2 *Withdrawal and Reinstatement of Students*
- EFA-2 *Course Syllabi*
- EGA-3 *Standard Grade Record*
- EGA-4 *Grading System*
- EGA-7 *Scholastic Standards and Academic Progress*