



California Community Colleges

MEMORANDUM

March 13, 2020

FS 20-01 | Via Email

TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers
Chief Business Officers

FROM: Lizette Navarette
Vice Chancellor, College Finance and Facilities Planning Division

RE: Novel Coronavirus (COVID-19) Guidance -- Attendance Accounting Implications
and Approved Exceptions

In response to the 2019 Novel Coronavirus, many colleges are considering the option of converting face-to-face courses to a distance education mode of instruction. The purpose of this memo is to provide guidance on the attendance accounting implications of such conversions and summarize important exceptions that have been approved in response to the current situation.

Courses using weekly or daily census reporting may continue to use these methods when converting to online instruction in response to emergency conditions. As most census dates have already passed for the spring semester, there should be little or no impact to attendance accounting for these courses.

Courses using the positive attendance method, tracking attendance at each class meeting, may continue to use positive attendance if converting to an online delivery that is synchronous, or live and includes the instructor interacting in real time with students online during scheduled class meetings.

For courses using the positive attendance method that are converting to an asynchronous online method, where students can log in and access information and assignments without interacting directly with the instructor, districts are permitted to estimate the contact hours that would have occurred had the courses not been converted to distance education. The estimation method is described on page 3 and 4 of this memo.

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Districts may provide a full refund of enrollment fees and do not need to record a “W” on the academic records of students who withdraw from classes due to extraordinary conditions such as the current situation.

ATTENDANCE ACCOUNTING FOR DISTANCE EDUCATION COURSES

Under ordinary circumstances and pursuant to California Code of Regulations, title 5, a course that offers any amount of instruction via distance education (whether it be a hybrid course or a fully online course) most often applies the Alternative Attendance Accounting Procedure described in California Code of Regulations, title 5, section 58003.1(f) in calculating FTES. While it is possible for a distance education course to be assigned to one of the other attendance accounting procedures (weekly census, daily census, or positive attendance), one of the requirements to be assigned these procedures is that instruction must occur at each scheduled class meeting and students and instructor must be able to interact during the class session via some sort of communication technology, meaning the instruction must be synchronous. Since this is not the way that most distance education courses operate, the vast majority (if not all) of distance education courses calculate FTES using the Alternative Attendance Accounting Procedure (Cal. Code Regs., tit. 5, § 58003.1(f)).

To compute credit FTES under the Alternative Attendance Accounting Procedure provided by California Code of Regulations, title 5, section 58003.1(f)(1), which includes Credit Distance Education (DE) courses that do not utilize standard attendance accounting procedures—Weekly, Daily, or Positive Attendance procedures— (e.g., DE courses that are offered asynchronously), one weekly contact hour is generally counted or substituted for each unit of credit in which the student enrolls (Note: California Code of Regulations, title 5, section 58009 provides an exception for DE Laboratory courses in terms of the weekly hours that can be substituted). Other than this contact hour substitution, the computation of FTES is identical to the basic Weekly Census or Daily Census procedures, whichever is applicable.

WEEKLY AND DAILY CENSUS COURSES

Pursuant to California Code of Regulations, title 5, section 58003.1(f) asynchronous distance education courses apply the Alternative Attendance Accounting Procedure in lieu of Weekly or Daily Census attendance accounting procedures. However, as it relates to courses converted to distance education as a result of emergency conditions in the current term that apply the Weekly and Daily Census attendance accounting procedure, colleges continue to be eligible to utilize those attendance accounting procedures for purposes of claiming state apportionment during the 2019-20 fiscal year. This attendance

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accounting exception is granted consistent with Emergency Condition provisions (Cal. Code Regs., tit. 5, § [58146](#)).

POSITIVE ATTENDANCE COURSES

POSITIVE ATTENDANCE COURSES CONVERTED TO SYNCHRONOUS DISTANCE EDUCATION

Synchronous distance education means that instruction occurs at each scheduled class meeting and the students and instructor interact during scheduled class sessions via some sort of communication technology. It is not sufficient to state in the official schedule that students in a particular distance education course are required to complete 3 hours per week independent of actual course meetings. (Cal. Code Regs., tit. 5, §§ 58003.1(b), 58004)

Positive attendance courses that are converted to a synchronous distance education mode of instruction should continue to apply the Positive Attendance Procedure. The instructor should continue to track each student's attendance at each class meeting (whether meeting face to face or online) and maintain records in the same manner as face to face positive attendance courses. This attendance accounting exception is granted consistent with Emergency Condition provisions (Cal. Code Regs., tit. 5, § [58146](#)).

POSITIVE ATTENDANCE COURSES CONVERTED TO ASYNCHRONOUS DISTANCE EDUCATION

For positive attendance courses that are converted to a distance education mode of instruction that is asynchronous (meaning the students and instructor are not interacting via communication technology during scheduled class sessions), colleges are permitted to estimate the number of contact hours that would have been generated in the affected courses, had the courses not been converted to distance education. In generating this estimate, colleges should conduct an analysis which considers total enrollment in the course and the number of contact hours generated by that enrollment in the prior three years. For courses that have been offered inconsistently in the past or are new, colleges should use data from a similar course. This average ratio of contact hours to total enrollment should be applied to the total enrollment in the affected courses to determine an estimate for the number of contact hours that would have been generated. Colleges should maintain attendance records as well as the analysis used to estimate the contact hours for affected positive attendance courses as required for the annual audit. Colleges should input the estimated contact hours under part IV of the CCFS-320 Apportionment Attendance Report. Chancellor's Office staff will review district's certified CCFS-320 data including a comparison to prior year and may request supporting documentation for

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these estimates if any large discrepancies are identified. This attendance accounting exception is granted consistent with Emergency Condition provisions (Cal. Code Regs., tit. 5, § 58146).

STUDENT REFUNDS AND WITHDRAWALS DUE TO EXTRAORDINARY CONDITIONS

California Code of Regulations, Title 5, section 58509 provides some relief for students attending colleges impacted by extraordinary conditions, such as the current situation. Title 5, section 58509 states a district may provide a full refund of enrollment fees to any student who withdrew from one or more classes, where the district finds that such withdrawal was necessary for one of the following reasons:

1. The college attended by the student was closed or the college was unable to provide all or substantially all of the instruction in the course or courses in which the student was enrolled due to fire, flood or other conditions qualifying for adjustment of apportionment pursuant to section 58146; or
2. Although the district does not qualify for an apportionment adjustment pursuant to section 58146, one of the conditions enumerated in that section made it difficult or impossible for the student to attend one or more courses because the student was actively engaged in responding to the fire, flood or other condition or because such condition required the student to evacuate his or her home.

Consistent with Title 5, section 55024, a district need not record a “W” on the academic records of a student who withdraws from one or more classes due to any of the circumstances described above.

The Chancellor’s Office is authorized, upon receipt of a written request from a district, to waive any other regulatory barriers that might be identified in order to accommodate students affected by any of the circumstances described above.

For more information and Chancellor’s Office guidance regarding the Novel Coronavirus, visit the [Novel Coronavirus 2019 section of the Chancellor’s Office Website](#) .

cc: Marty Alvarado, Executive Vice Chancellor, Educational Services and Support
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