



California Community Colleges

MEMORANDUM

December 15, 2020

FS 20-12| 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

CC: All-CCCCO Staff

RE: COVID-19 Guidance - Attendance Accounting for Noncredit Courses and Exception Related to Distance Education Lab Courses

In response to the 2019 Novel Coronavirus (COVID-19), colleges converted face-to-face courses to distance education modalities. The purpose of this memo is to provide temporary guidance on attendance accounting for open-entry/open-exit noncredit distance education courses and to remind districts of an exception related to laboratory courses offered through independent study or distance education modalities contained in title 5 section 58009.

Background

In response to the 2019 Novel Coronavirus, colleges converted credit and noncredit face-to-face courses to a distance education mode of instruction for the foreseeable future. Guidance described in memo *FS 20-04 Novel Coronavirus (COVID-19) Guidance - Attendance Accounting Implications and Guidance (revised)*, issued in April 2020, allowed districts to continue to use the planned face-to-face Attendance Accounting Method or in some cases to temporarily estimate the number FTES that would have been generated had the course not been converted to distance education. Further guidance, provided in memo *FS 20-09 - Phase Out of Certain Emergency Allowances for Attendance Accounting Methods and Student Withdrawals*, requires districts to convert courses delivered through online instruction to the appropriate

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attendance accounting method per regulation and as described in the Student Attendance Accounting Manual beginning with the Spring 2021 semester.

Temporary Attendance Accounting Procedure for Open-Entry/Open-Exit Noncredit Distance Education Courses

Prior to the pandemic, the Chancellor's Office previously advised districts that open-entry/open-exit noncredit courses that permit students to enroll at any point throughout the term must be taught synchronously and use the positive attendance procedure. Currently, due to the 2019 Novel Coronavirus, all courses including open-entry/ open-exit noncredit courses are being offered via distance education. As a result and due to their fluid structure, these courses do not have an available option for calculating and reporting FTES.

In title 5, noncredit courses are permitted only two apportionment methods: 1. Actual Hours of Attendance (Positive Attendance) or 2. Alternative Attendance Accounting Procedure - Noncredit. Prior to the pandemic, the Chancellor's Office advised districts that synchronously taught open-entry/open-exit noncredit courses that permit students to enroll at any point throughout the term were permitted to use the positive attendance procedure. This permission continues and is delineated in item 6 on page 3-17 of the Student Attendance Accounting Manual on the CCCC website. These courses are also permitted to utilize the Alternative Attendance Accounting Procedure - Noncredit, delineated on pages 3-20 to 3-21 of the manual.

To provide a temporary solution for districts to calculate and report FTES in open-entry/open-exit noncredit courses, the Chancellors Office is allowing these courses to apply the Alternative Attendance Accounting procedure for noncredit courses contained in title 5 section 58003.1(f)(2). Under this procedure, attendance is captured based on two points in the semester, the 20% point and the 60% point. Instructors should determine the number of students actively enrolled as of these two points. There should be a clear understanding that students who were enrolled at the 20% point might not still be enrolled at the 60% point and that late starting students may enroll following the 20% point and be counted in the attendance as of the 60% point. Attendance records should be maintained to enable an independent determination by an auditor for claimed FTES.

The Chancellor's Office will continue to work on a more permanent solution for the attendance accounting procedure for noncredit distance education courses, including

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those that are open-entry/open-exit. In the meantime, these courses should apply the procedure in title 5 section 58003.1(f)(2) as described in the next section.

Course Outline of Record

Colleges should review the course outline of record for these courses to ensure they are current and accurate in terms of the total hours. For those that are out of date, colleges should submit updated course outline of record as well as the respective course or program record and any affected supporting documentation through the Chancellor's Office Curriculum Inventory (COCI) system by April 1, 2021.

Attendance Accounting Procedure Noncredit Distance Education Courses

Pursuant to title 5 section 58003.1(f)(2) and as summarized in the [Student Attendance Accounting Manual](#), beginning on page 3-20, to calculate FTES for noncredit distance education courses delivered asynchronously and using the alternative attendance accounting procedure, districts should follow these steps:

1. To derive the WSCH factor used to calculate FTES, determine the number of hours of coursework required for a class by adding together the following:
 - a. The total number of hours of instruction or programming to be received by students in the class.
 - b. The number of hours expected for any outside-of-class work (as noted in the approved class outline), and
 - c. Any instructor contact hours as defined by Title 5, Section 55204 for distance education courses or by Title 5, Section 55234 for independent study courses.
2. Divide the sum total of the hours as determined in (1.), above, by 54 (a measure equating to a unit of credit similar to that used in credit distance education). The resulting quotient is the WSCH factor that is multiplied by the number of students enrolled as of the two census dates. The student contact hours thus derived are multiplied by 17.5. The factor of 17.5 is to be used irrespective of the length of the course.
3. Report the student contact hours for the noncredit distance education course as of the two census dates. The average of the contact hours are divided by 525 to calculate FTES

Following is an example of FTES calculation for a noncredit distance education course:

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1. Determine the WSCH factor:

5.0 hours/week	instruction
10.0 hours/week	outside study
<u>.5</u> hours/week	meeting with instructor
15.5 hours/week*	

*15.5 hours x 6 weeks (length) = 93 total hours

WSCH factor = 93 hours * 54 (instructional measure) = 1.722

2. Calculate FTES:

24 students actively enrolled at First Census (20% point)

First Census Student Contact Hours = 1.722 x 24 x 17.5 = 723.24

20 students actively enrolled at Second Census (60% point)

Second Census Student Contact Hours = 1.722 x 20 x 17.5 = 602.70

The FTES is the average of the Students Contact Hours at First and Second Census, divided by 525:

FTES = (723.24 + 602.70) / 2 * 525 = 1.26

In the computation of noncredit distance education course FTES, the 17.5 used above as a multiplier is a calculation factor, not a term-length multiplier. This factor of 17.5 will be applied in the computation of FTES for such courses no matter what length the course may be, or whether a college is on the semester or quarter system or has adopted a compressed academic calendar.

Attendance Accounting Exception for Distance Education Lab Courses

A course that offers any amount of instruction through 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. For courses that apply the Alternative Attendance Accounting Procedure for credit courses (title 5, section 58003.1(f)(1)), one weekly student contact hour is counted for each unit of credit for which the student is enrolled as of the census date or day.

Title 5, Section 58009 provides an exception to the general rule in the paragraph above, which permits weekly student contact hours in distance education or independent study *laboratory* courses utilizing this procedure to instead be calculated as equivalent to the number of hours

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that would be generated in a face-to-face laboratory course. This exception applies to courses that are partially or wholly laboratory based. The reason for this exemption is that there is a significant difference in the amount of FTES generated between a lab course offered through independent study or distance education and a lab course offered via face-to-face lab instruction if the calculation is based on the number of units.

FTES in face-to-face courses are based on contact time in the classroom. In a traditional semester, each unit of lecture credit requires one hour of contact time, while each unit of laboratory credit requires three hours of contact time. For lecture courses, the units thereby align with weekly class hours. But for laboratory courses, pay per unit would only compensate districts for one of the three weekly contact hours. Section 58009 allows the district to claim all three contact hours for the online laboratory as they do for the same class taught face-to-face.

For example, in a traditional one-unit weekly census lab course a student would attend class for three hours a week for 17.5 weeks. If there were 30 students actively enrolled as of the census date the following calculation would be used to determine the number of FTES:

$$(30 \text{ students}) \times (3 \text{ hours per week}) \times (17.5 \text{ weeks}) / 525 = 3 \text{ FTES}$$

If this same lab course was conducted via independent study or distance education, the weekly contact hours would have been based on the number of units. If there were 30 students actively enrolled as of the census date, the FTES calculation would be as follows:

$$(30 \text{ students}) \times (1 \text{ unit}) \times (17.5 \text{ weeks}) / 525 = 1 \text{ FTES}$$

For more information please contact Natalie Wagner, Interim Director of Fiscal Standards and Accountability, at nwagner@cccco.edu.

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