

# Backdating: Do's and (mostly) *Don'ts*

**Presented by:**

*Gayle Barrett, AVP for Enrollment & Retention Services*

*Lourdes Cruz, Executive Director of Student Information Services*

*Cynthia Isales, Compliance Officer*

*Steve McDowell, AVP for Financial Aid Services & Title IV Compliance*

# Today's Agenda

- *What is Backdating?*
- *What are the rules associated with state and federal records?*
- *Case Studies*
- *Consequences of Backdating*
- *Helpful Tips*
- *Summary*
- *Questions & Comments*

# What is Backdating?

- *Using a prior date to force Banner to recognize a registration status that is outside of the current date.*

# Rules Pertaining to State Records

- Under Connecticut state law, state records cannot be altered or destroyed except as authorized by the Office of the Public Records Administrator. Connecticut General Statutes § 11-8b.
- The unauthorized removal or destruction of records is a misdemeanor or felony offense and is punishable by fine or imprisonment. Connecticut General Statutes §§ 11-8b, 1-240 and 53-153.

# Rules Pertaining to Computer Records

- A person is guilty of the computer crime of misuse of computer system information when:

*He intentionally or recklessly and without authorization alters, deletes, tampers with, damages, destroys or takes data intended for use by a computer system, whether residing within or external to a computer system.*

Connecticut General Statutes § 53a-251.

# Federal Rules Pertaining to Financial Aid Records

A school must keep comprehensive, accurate program and fiscal records related to its use of *Title IV* program funds. Records must demonstrate proper administration of Title IV program funds and show a clear audit trail for *Title IV* program expenditures. For example, records for each *Title IV* recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed according to program regulations.

- *2024-2025 Federal Student Aid Handbook, Volume 2, Chapter 7*
- *34 CFR 668.24*

# Grading, Notations, and Academic Engagement Policy

In accordance with federal regulatory definition, academic engagement (otherwise known as “academic attendance” and “attendance at an academically-related activity”) includes, but is not limited to:

- Physically attending a class where there is an opportunity for direct interaction between the instructor and students
- Submitting an academic assignment
- Taking an exam, an interactive tutorial, or computer-assisted instruction;
- Attending a study group that is assigned by the institution
- Participating in an online discussion about academic matters
- Initiating contact with a faculty member to ask a question about the academic subject studied in the course.

Academic Engagement does not include activities where a student may be present, but not academically engaged, such as

- Logging into an online class without active participation
- Participating in academic counseling or advising.

The institution must make a determination of “academic attendance” or an “academically related activity;” a student’s certification of attendance that is not supported by institutional documentation is not acceptable.

- *34 CFR 668.22(l) and 34 CFR 600.2*
- *BOR Policy on Grading, Notations, and Academic Engagement (2020)*



# Case Study #1: NP Reinstatement

*A student was noted as NP (non-participating) for a fall 2024 course. After census, the instructor realized that an error was made, and the student had been participating in the course.*

*The instructor reaches out to the One Stop to re-enroll the student in the course they were dropped from due to campus error. The Campus Dean has approved the re-enrollment.*

*To re-enroll the student, the One Stop must backdate the registration in Banner.*



# Consequences of Backdating

- ***Case Study #1 (NP Reinstatement)***

- Student Record has been altered to re-enroll the student in the course, using a potentially inaccurate registration date to force the registration through Banner.
- Student enrollment data was reported to National Student Clearinghouse (NSC) and National Student Loan Data System (NSLDS) as enrolled in specific number of credits. This data is now inaccurate and must be corrected.
- The student may have incorrectly been placed into their grace period or repayment on their existing student loans.
- Depending on the actual academic engagement documented, the student's financial aid may not be able to be reinstated, causing a student to owe a balance to CT State.

# What Should Be Done?

- ***Case Study #1 (NP Reinstatement)***

- If a campus error was truly made, campuses should utilize the NP Reinstatement form that verifies the error.
  - Students must have participated as defined in the policy to receive financial aid for the course(s) in question.
- If student did not participate during as defined in the policy, ***the student should not be reinstated into their coursework.***

# Case Study #2: Late Withdrawal

*A student makes a request to withdraw from a course after the deadline.*

*The student provides supporting documentation to the Campus Dean, who approves the request.*

*To process the late withdrawal, the One Stop must backdate the withdrawal in Banner.*

# Consequences of Backdating

- ***Case Study #2 (Late Withdrawal)***

- Student Record has been altered to withdraw the student from the course, using an inaccurate withdrawal date to force the registration through Banner.
- Student enrollment data was reported to National Student Clearinghouse (NSC) and National Student Loan Data System (NSLDS) as enrolled in specific number of credits. This data is now inaccurate and must be corrected.
- Overall date of the student's withdrawal must be updated to ensure the student's federal funds are returned accordingly. This could leave the student with a balance owed to the College.

# What Should Be Done?

- ***Case Study #2 (Late Withdrawal)***
  - Financial aid must be notified of any late withdrawal to ensure the student's award is calculated correctly.

# Case Study #3: Removal of Course from Student Record

*One month into the semester, a student appears to be struggling in their coursework in a specific class.*

*The instructor is concerned about the impact of having a withdrawal for the course on the student's transcript and requests that the course is removed from the student's academic history.*

*To remove the course from the student's academic history, the One Stop must backdate & delete the registration in Banner.*

# Consequences of Backdating

- ***Case Study #3 (Removal of Course from Student Record)***
  - Academic History has been erased from a student's official transcript.
  - Student enrollment data was reported to National Student Clearinghouse (NSC) and National Student Loan Data System (NSLDS) as enrolled in specific number of credits. This data is now inaccurate and must be corrected.
  - **Financial Aid may have been disbursed to the student and must now be repaid to the federal government...either by the student or CT State.**



# What Should Be Done?

- ***Case Study #3 (Removal of Course from Student Record)***
  - Academic History should NEVER be from a student's official transcript after census.

# Case Study #4: Course Swap

*A request has been made to make a course swap (i.e., replace one course with a different section of the same course) after census has passed. This request has been granted by a Campus Dean.*

*To complete the course swap (after census), the One Stop must remove the first course from the student's academic history and backdate the registration for the swapped course in Banner.*

# Consequences of Backdating

- ***Case Study #4 (Course Swap)***

- Academic History has been erased from a student's official transcript.
- Student enrollment data was reported to National Student Clearinghouse (NSC) and National Student Loan Data System (NSLDS) as enrolled in specific number of credits. This data is now inaccurate and must be corrected.
- Financial Aid may be impacted if there is a difference in the number of credits (from course "a" to course "b" in the swap).
- Financial Aid may be impacted if the courses in question are in different parts of term.
- Potential for a CPoS alert.

# What Should be Done?

- ***Case Study #4 (Course Swap)***

- Advisor should verify that the course swap does not impact their program of study (CPoS).
- Financial Aid must be notified of any course swap before updating in Banner.

# Case Study #5: Incorrect Engagement

*A parent calls the Financial Aid Office wondering why they are receiving disbursement notifications regarding their parent loan for their student's charges at CT State. After confirming a FERPA release, the Financial Aid Office determines the student was assigned as attending their courses by faculty (no NPs assigned).*

*The parent confirms the student was in a car accident prior to the semester, was hospitalized, and has yet to attend. The parent also provides documentation to support the claim.*

*To update the student's record, the One Stop must backdate & assign NPs in Banner.*

# Consequences of Backdating

- ***Case Study #5 (Incorrect Engagement)***

- Academic History has been erased from a student's official transcript.
- Student enrollment data was reported to National Student Clearinghouse (NSC) and National Student Loan Data System (NSLDS) as enrolled in specific number of credits. This data is now inaccurate and must be corrected.
- Any material impact to the student and/or parent grace period and loan repayment window must be corrected.
- Depending on timing, the parent may still be held responsible for any accrued interest on the loan as a result of the college's error.
- This is an audit finding for making an ineligible disbursement.

# What Should be Done?

- ***Case Study #5 (Incorrect Engagement)***

- The student's courses should receive NP assignments, and a correction to the student's charges should be made.
- Financial Aid must work with the parent and/or the US Department of Education to recall the incorrectly disbursed parent loan funds.
- Faculty must retain accurate records when determining if a student has academically engaged in accordance with our policy and federal regulations to prevent ineligible disbursements.



# Helpful Tips

- *Academic Engagement policy is based on federal definitions & regulations.*
- *Review course rosters & follow Academic Engagement policy as written.*
- *Removing a record because a student is struggling in a course, while coming from good intentions, will cause long-term financial issues for the student & is technically considered a computer crime.*
- *Course swaps are problematic when part of term is not the same, and the credits are not an even exchange (and should only be done in extenuating circumstances!). They are more problematic after census has passed.*

# Summary

- *Backdating is not a standard business process and should only be used in extenuating circumstances.*
- *Financial Aid must be consulted to ensure that no fiscal harm may come to the student or to CT State.*
- *State & federal auditors have the right to review any & all academic engagement documentation (which includes interviewing faculty) as needed.*
- *Academic history should never be removed from a student's official record after the census date.*

# Questions & Comments?