

## Cross-Listing Considerations

### **Financial Aid:**

According to federal regulations, a course's start date must align with the institution's published academic calendar. Allowing students to begin coursework before the official start date may create compliance issues, including potential audit findings by the Department of Education, and could jeopardize a school's Title IV eligibility.

Title IV funds are earned starting on the first day of attendance within the defined enrollment period. If a student engages in academic activity before the published start date, it can cause discrepancies in calculating the amount of aid earned. Since the enrollment period used in this calculation begins on the official start date, any work done before that point is not factored in. This can be particularly problematic if the student later withdraws, as the institution may not be able to accurately determine the percentage of aid earned or the 60% completion threshold for Return to Title IV (R2T4) purposes.

Additionally, the National Student Loan Data System (NSLDS) requires accurate reporting of enrollment status, which must reflect the institution's published academic calendar. If a student starts a course early but is officially recorded as enrolled on the published start date, it creates a mismatch in federal records, which can cause inaccurate loan deferment and repayment status and could lead to NSLDS data discrepancies and compliance reviews.

### **FERPA and Student Services:**

Published course start and end dates provide a structured framework for determining when students are officially enrolled, actively participating, and earning academic credit. These dates also guide key Student Services administrative processes such as course add/drop periods, withdrawal deadlines, and tuition refunds.

Finally, under FERPA, student enrollment data is protected. Sections can be merged if students regularly interact in class (in-person only) or online (only) and share the same start and end dates. If they do not meet these criteria, the sections must remain separate.

In addition to compliance reasons listed above, there are also equity concerns. When students are enrolled in the same course shell but have different timelines, some may end up with more or less time to complete the same requirements. This creates inconsistencies in expectations and opportunities for success, making it harder to ensure a fair and balanced experience for all students.