

Return of Title IV Funds - Modules

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TOPICS covered today

- Program Integrity rules
- Questions and Answers
- Contact information

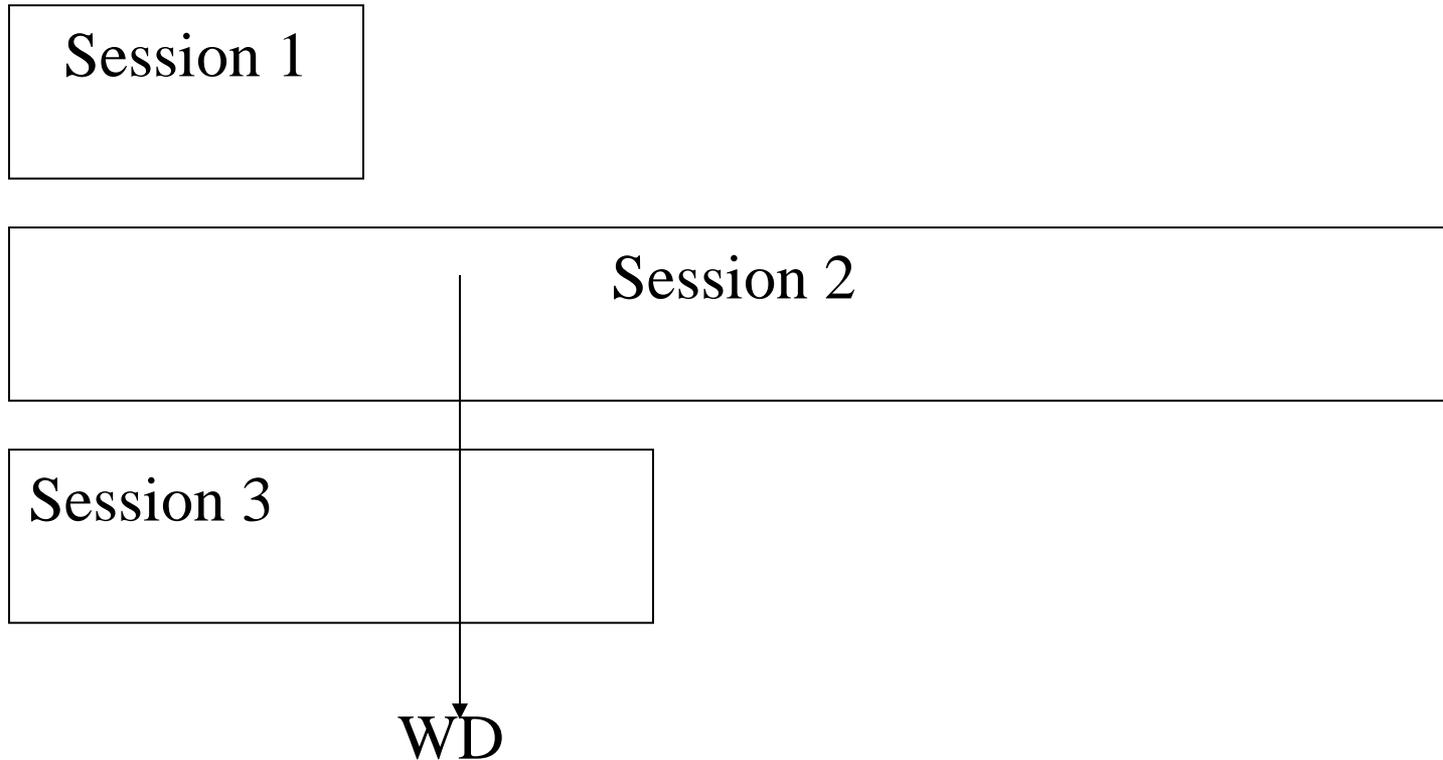
34 CFR 668.22

- When a recipient ceases attendance before the scheduled end of the program for which s/he received Title IV, HEA aid
 - The institution is required to determine the amount of aid that the student earned
 - The institution also determines the unearned portion

Rules prior to 7/1/11

- R2T4 prior to 7/1/11 did not specifically deal with term-based programs with courses that are less than the length of the term
- GEN-00-24 – (Dec. 2000) – we said when a student is in a modular program within a standard term and the student completes at least one of the modules, then R2T4 does not apply
 - Completing one compressed course is the equivalent of completing a single course that spans the entire PP or POE

GEN - 00-24 (Dec. 2000)



Withdrawal after completing Session 1 and two weeks into Session 2 and 3

Program Integrity – Final Regulations (75 FR 66832) 10/29/10

- Return of Title IV Funds topics:
 - Definitions
 - When a student is considered a withdrawal
 - Written Confirmation
 - Institution that is required to take attendance
 - Total # of days in a PP or POE
 - Programs offered in modules
 - Academically-related activities

R2T4 – Current Definitions

- Standard Terms
 - Semesters, trimesters – generally 14 – 17 weeks long
 - Quarters – generally 10 – 12 weeks long
- Nonstandard terms – where all coursework is expected to begin and end within a set period of time that is not a semester, trimester, or quarter terms
- Nonterms – all clock hour programs and credit hour programs that do not begin and end within a set time (self-paced), where courses overlap where sequential courses do not begin and end within a term

R2T4 – Current Definitions

- “Week of instructional time”
 - Any seven consecutive day period with at least one day in which scheduled instruction or examination occurs
 - Does not include homework time, vacation time, orientation, or counseling

Current R2T4 Regulations – Definitions

- “Offered in modules”
 - If a course does not span the entire payment period (PP) or period of enrollment (POE)

“Offered in modules”

- If the student ceases attendance before the period for which aid was awarded, it is a withdrawal
- The denominator of the Return calculation includes the full # of days used to determine the aid award, absent any institutionally scheduled breaks of 5 or more consecutive days or periods of time that the student was on an approved LOA

“Offered in modules” – example A

- **Institution A:**
 - Fall and Spring = standard terms
 - Never considered to be “offered in modules”
 - Summer = three 5-week sessions (combined to be a standard term)
 - Students can enroll in any of the Summer Sessions or all of them
 - Students enrolled in the 5-week Sessions are considered in programs “offered in modules” since none of the Sessions span the entire length of the term

“Offered in modules” – example A

- Student #1 – Enrolls in all three Summer Sessions

and ceases enrollment on Day 5 in the 1st 5-week Session

“Offered in modules” – example A

- THE RESULTS:
 - Step 1 – Recalculate Pell & Campus-based
 - Step 2 – Determine earned & unearned amounts of Title IV aid (TIV)
 - Numerator = # of days attended in Course 1 (assume no breaks) of 5 or more days
 - Denominator = Start date of Course 1 thru end date of Course 3 (less any scheduled break of 5 or more consecutive days or approved LOAs) 105 days or .048 or 4.8%

“Offered in modules” – example A

Session 1 5 weeks	Session 2 5 weeks	Session 3 5 weeks
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35 days

35 days

35 days

Withdrawal
Day 5

“Offered in modules” – example A

Session 1 5 weeks	Session 2 5 weeks	Session 3 5 weeks
35 days	35 days	35 days

Withdrawal Day 5 student also drops remaining Sessions.

At an Inst Req'd to Take Attendance: $WD = \text{Day 5}$. Denominator = 105 days. Per GEN 04-12, the inst. must have a process to make this determination no later than 14 days after the LDA.

Inst. NOT Req'd to Take Attendance: $WD = 668.22(c)$. Denominator = 105 days.

“Offered in modules” - example A

- Student #2: Enrolls in all three Summer Sessions
 - Day 4 of Session 1, drops Session 2
 - Day 8 of Session 1, withdraws during the 1st 5-wk Session
 - Student does not provide written confirmation of return within the payment period

“Offered in modules” – example A

- THE RESULTS:
 - Step 1 – Recalculate Pell & Campus-based
 - Step 2 – Determine earned & unearned amounts of TIV
 - Numerator = # of days attended (assume no breaks) 8 days
 - Denominator = 35 days each in Sessions 1 & 3, less any scheduled breaks or approved LOAs 70 days or .1142 or 11.4%

“Offered in modules” – example A

Session 1
5 weeks

~~Session 2
5 weeks~~

Session 3
5 weeks

35 days

~~35 days~~

35 days

Day 4 – drops
Session 2

Day 8 - Withdraws

“Offered in modules” – example B

- Summer Sessions include three 5-week Sessions and 15-week Sessions

“Offered in modules” – example B

Session
5-week

Session
5-week

Session
5-week

Session 15-week

Student C enrolls in two 15-week courses – this student is not considered to be enrolled in a program offered in modules

Student D enrolls in the first 5-week module and one 15-week course – this student is considered to be enrolled in a program offered in modules

When a student is considered a withdrawal

- In a program measured in credit hours
 - Student does not complete all the days scheduled to complete in the PP or POE
- In a program measured in clock hours
 - Student does not complete all the clock hrs & wks of instructional time scheduled to complete in the PP or POE

When a student is considered a withdrawal – (cont'd)

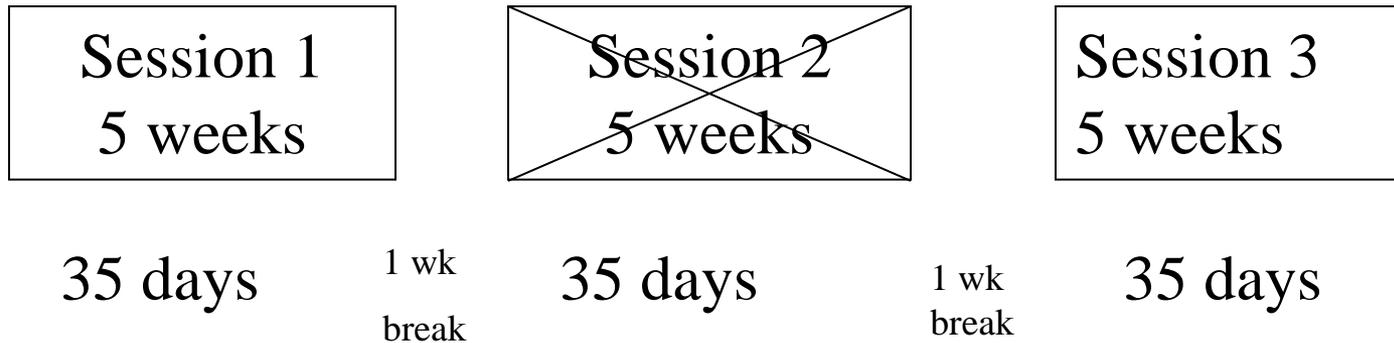
- In a nonterm or nonstandard term
 - Student is not scheduled to begin another course within the PP or POE for more than 45 calendar days after the end of the module the student ceased attending
 - (Unless the student is on an approved LOA)

“Offered in modules” – example C



Claire begins Session 1 in a nonterm program, but withdraws on Day 5. She indicates that she wants to return at the beginning of Session 3 to resolve some health issues in the interim. What is her withdrawal date?

“Offered in modules” – example C



What is Claire’s withdrawal date?

Day 5 – it will be 72 days before Session 3 begins, however for the purpose of determining whether written confirmation is required, we consider the number of days from the end of the module the student ceased attending

It will be 49 days before Session 3 begins

“Offered in modules” - example C



Claire’s other option would be to seek a Leave of Absence beginning on Day 6 of Module 1 and ending the day before Session 3 begins.

Written confirmation

- For courses offered in modules
 - A student is NOT considered to have withdrawn if,
 - For standard term programs, the institution obtains written confirmation that the student will return to complete a later module within the same PP or POE
 - For nonterm and nonstandard terms – the institution obtains written confirmation that module begins no later than 45 calendar days after the end of the module the student ceased attendance

Written confirmation - cont'd

- Student can revise the date of return to a later module, if
 - Student does so in writing, between the time of the withdrawal, but prior to the return date
 - For nonterm and nonstandard term programs, the module cannot begin later than 45 calendar days after the end of the module the student ceased attendance

“Written confirmation”

- Student #3 – Enrolls in all three Summer Sessions and drops Session 2 on Day 3, then ceases enrollment on Day 5 in the 1st 5-week Session, but provides written confirmation of future return

“Offered in modules” - example D

- **THE RESULTS:**
 - Step 1 – Recalculation of Pell & Campus-based
 - Step 2 – No Return calculation due to the fact that the student provides written confirmation of her/his planned return between the time of the withdrawal and before the start of the 3rd module

“Offered in modules” - example D

Session 1
5 weeks

~~Session 2
5 weeks~~

Session 3
5 weeks

35 days

~~35 days~~

35 days

Day 5 – withdraws from Session 1 and provides written confirmation that student will return to Session 3

Written confirmation – cont'd

- What happens when the student doesn't return for the future module?
- The withdrawal date (WD) is -
 - At an institution required to take attendance = the last date of attendance (LDA)
 - At an institution not required to take attendance
= 34 CFR 668.22(c)(1)(i) – (vi)

“Written confirmation”

Session 1
5 weeks

~~Session 2
5 weeks~~

Session 3
5 weeks

35 days

~~35 days~~

35 days

Day 4 – Withdraws from Session 1 and drops Session 2, but provides written confirmation of return to Session 3

Day 71 – Student does not return. WD = Day 4 at Inst.
Req'd to Take Attendance;

34 CFR 668.22(c)(1)(i) – (vi) at an Inst. NOT Req'd to
Take Attendance

Written confirmation – eff. 7/1/11- cont'd

- What happens when a student DOES return to a later module within the same PP or POE?
 - If this is a nonterm program, the student reenters the same program – student is eligible for the same amt. of Title IV, HEA funds (TIV) prior to WD
 - As long as the student returns within 180 days TIV is restored
(see 668.4(f))

Institution req'd to take attendance –

- An outside entity (accreditor, State) has a requirement to take attendance
 - (No change - this is the current rule)
 - If the outside entity has a requirement for attendance taking for a sub-group of students, then that sub-group are bound by the “Institution required to take attendance” rules in 668.22(b)
 - If the outside entity has a requirement that attendance taking must occur for a limited time

Institution req'd to take attendance – cont'd

- The institution has a requirement that attendance be taken
 - The Program Integrity Final Regulations do NOT require institutions to take attendance
 - If an institution requires its faculty to take attendance at the program, departmental, or institutional level
 - If there is no institutional requirement, but an individual faculty member chooses to take attendance, those records **could**, but would not be required to be used (Therefore, the institution is not required to take attendance – 668.22(c))

Institution req'd to take attendance

- Institution or an outside entity has a requirement that can only be met by taking attendance for the program or a portion of the program

Institution req'd to take attendance

- If the institution is required to take attendance or requires attendance for only some students
 - The attendance records must be used to determine the withdrawal date for that cohort of students

Institution req'd to take attendance

- If the institution is required to take attendance or requires attendance for a limited period of time
 - The attendance records must be used to determine the withdrawal date for that limited period of time
 - A student in attendance on the last day of the limited period, who continues attendance, but subsequently WDs – will be treated as a student at an inst. not req'd to take attendance

Institution req'd to take attendance



2 wks

Program A – Daily attendance taking is required for the 1st 2- week period

All students who withdraw during the 1st 2 wks = Inst. Req'd to take attendance

All students who withdraw after the 2-wk period = Institution not required to take attendance

Institution req'd to take attendance

- Only required to take attendance for a single day
 - “Census” snap-shot
 - Not considered “An institution required to take attendance”
 - Follow the rules in 668.22(c)

Institution required to take attendance

- Q – If an institution monitors whether its online students log into classes, is this an institution “required to take attendance”?
- A – No, monitoring by itself does not meet the definition, however, if there is tracking academic engagement then the institution is considered to be an institution that is required to take attendance”.

Total # of days in a PP or POE

- Includes all the calendar days within the period that the student was scheduled to complete, except
 - The # of institutionally scheduled breaks of 5 consecutive days or more are not included in the total calendar days used in the Return calculation, or
 - The days in which the student was on an approved LOA (that complies with 668.22(d)).

Program “offered in modules”



Student enrolls for 3 modules within a term each 35 days in length and with a weekend in between modules 1 & 2 and 2 & 3.

Cheryl begins and completes Module 1 and doesn't return for Modules 2 & 3 and doesn't contact the institution.

Institution Req'd to Take Attendance – $WD = LDA$ - last day she took a final exam. The denominator = 109 days (35 x3, plus 4 days between Modules).

Institution NOT Req'd to Take Attendance – $WD = 34$ CFR 668.22(c)(1)(i) – (vi). The denominator = 109 days (35 x 3, plus 4 days between Modules).

Program “offered in modules” – eff. 7/1/11



Student enrolls for 3 modules within a standard term each 35 days in length and with a week in between modules 1 & 2 and 2 & 3.

Anthony begins and completes Module 1 and doesn't return for Modules 2 & 3 and doesn't contact the institution.

Institution Req'd to Take Attendance – WD = LDA- last day he took a final exam. The denominator =105 days (35 x 3). The time between the Modules are more than 5 consecutive days and therefore excluded .

Institution NOT Req'd to Take Attendance – WD = 34 CFR 668.22(c)(1)(i) – (vi). The denominator =105 days (35 x3).

Academically-related activity – what's included

- Examples of an academically-related activity
 - Physically attending a class with direct interaction between the instructor and students
 - Submitting an academic assignment
 - Taking an exam, an interactive tutorial, or computer-assisted instruction

Academically-related activity – what's included

- Examples of an academically-related activity – (con't)
 - 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

Academically-related activity – what's NOT included

- Effective 7/1/11 – you can no longer consider the following an academically-related activity for R2T4 purposes -
 - Living in institutional housing
 - Participating in the institution's meal plan
 - Logging into an online class without active participation
 - Participating in academic counseling or advisement

Academically-related activity

- **PLEASE REMEMBER !**
 - These academically-related activities must be documented and retained by the institution in accordance with the recordkeeping requirements in 34 CFR 668.24
 - Student self-documentation of an academically-related activity will not meet the requirement

QUESTIONS?



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