

# Session #45

## R2T4 Funds New Regulations

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# Current Rules – 34 CFR 668.22

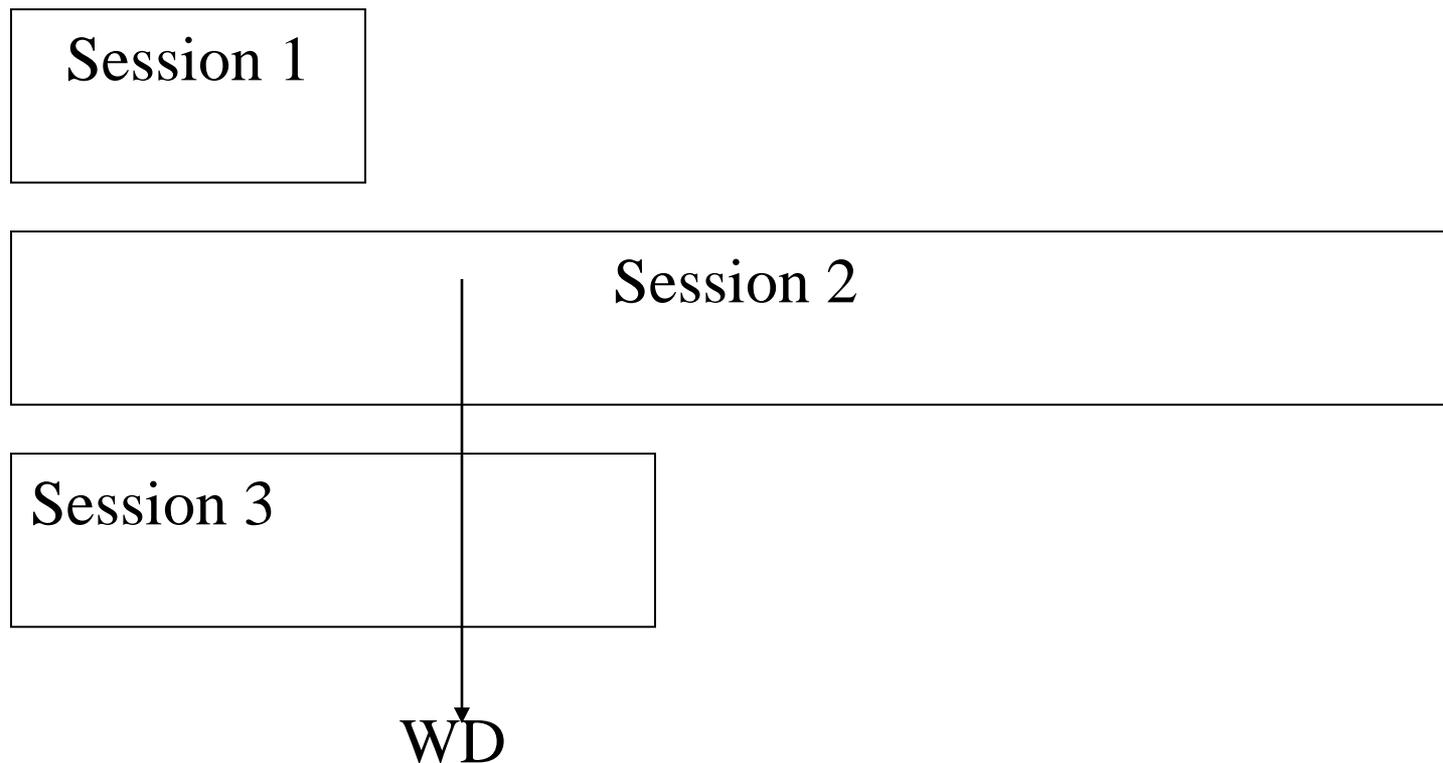
- When a recipient ceases attendance before the scheduled end of the program for which s/he received Title IV, HEA aid
  - The institution is required to determine the amount of aid that the student earned
  - The institution also determines the unearned portion

# Current Rules – continued

- Current rules 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 number 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
- Non-standard 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
- Non-terms – 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

# R2T4 – Definitions (eff. 7/1/11)

- “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 number of weeks used to determine the aid award, absent any institutionally scheduled breaks of five 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 summer sessions are considered in programs “offered in modules” since none of the sessions span the entire length of the term (the 15-week period)



# “Offered in Modules” - Example A

- Student #1 – Enrolls in all three summer sessions and ceases enrollment on Day 5 in the first 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) 5 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

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.

Institution Required to Take Attendance:  $WD = \text{Day 5}$ . Denominator = 105 days. Per GEN 04-12, the institution must have a process to make this determination no later than 14 days after the LDA.

Institution not Required 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 first 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 = number 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 .114 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



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# “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 one 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 – (effective 7/1/11)

- 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 – (effective 7/1/11) (cont'd)

- In a non-term or non-standard term
  - Student is not scheduled to begin another course within a 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

Session 1  
5 weeks

Session 2  
5 weeks

Session 3  
5 weeks

35 days

1 wk  
break

35 days

1 wk  
break

35 days

Claire begins Module 1 in a non-term 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

Session 1  
5 weeks

~~Session 2  
5 weeks~~

Session 3  
5 weeks

35 days

1 wk  
break

35 days

1 wk  
break

35 days

Claire drops Session 2.

What is Claire's withdrawal date?

Day 5 – it will be 79 days before Session 3 begins.



# “Offered in Modules” - Example C

Session 1  
5 weeks

Session 2  
5 weeks

Session 3  
5 weeks

35 days

1 wk  
break

35 days

1 wk  
break

35 days

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 – effect. 7/1/11

- 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 non-term and non-standard 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 – eff. 7/1/11- (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 non-term and non-standard term programs, the later module begins no 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, drops session 2 on Day 4. Ceases enrollment on Day 5 in the first 5-week session, but provides written confirmation of future return

# “Offered in Modules” - Example D

- The Results:
  - Step 1 – Recalculation of Pell & Campus-based
    - When the student indicates s/he will not be returning to take all the modules the Pell award was based upon
  - 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 third 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 4 – drops Session 2

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



# Written Confirmation – eff. 7/1/11- (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 = midpoint or the last date of an academically-related activity

# “Written Confirmation”

Session 1  
5 weeks

35 days

~~Session 2  
5 weeks~~

~~35 days~~

Session 3  
5 weeks

35 days

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

Day 71 – Student does not return. WD = Day 4 at Institution Required to Take Attendance; Midpoint or Academically-related activity at an Institution not Required 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 non-term program, the student reenters the same program – student is eligible for the same amount of Title IV, HEA funds prior to WD
  - As long as the student returns within 180 days TIV is restored (see 668.4(f))



# Institution Required 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 Required to Take Attendance

## – eff. 7/1/11 (cont'd)

- The institution has a requirement that attendance be taken
  - The Program Integrity – Final regulations do not require institutions to take attendance, however
  - 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 Required to Take Attendance

– eff. 7/1/11

- 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
  - Remember the regulations prior to July 1, 2011 – if an outside entity has a requirement that, as determined by the entity, the institution is required to take attendance



# Institution Required to Take Attendance – eff. 7/1/11

- 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 Required to Take Attendance – eff. 7/1/11

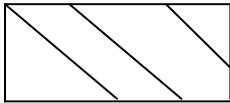
- If the institution is required to take attendance or requires attendance for only some students
  - The attendance records must be used to determine the withdrawal date

# Institution Required to Take Attendance

## – eff. 7/1/11

- 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 subsequently WDs – will be treated as a student at an institution not required to take attendance

# Institution Required to Take Attendance – eff. 7/1/11

	Term I – 16 weeks
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2 wks

Program A – Daily attendance taking is required for the first 2- week period.

All students who withdraw during the first 2 wks = Institution required to take attendance.

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



# Institution required to Take Attendance – eff. 7/1/11

- 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)

# Total # of Days in a PP or POE – eff. 7/1/11

- Includes all the calendar days within the period that the student was scheduled to complete, except
  - The number of institutionally scheduled breaks of five 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

## Program “Offered in Modules” – eff. 7/1/11

- For programs “offered in modules” the total number of days does not include –
  - The days a student was on an approved LOA
  - Any institutionally scheduled break of five or more consecutive days when the student was not scheduled to attend a module or other course offered during that time



# Program “Offered in Modules” – eff. 7/1/11

Module 1

Module 2

Module 3

Student enrolls for three 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 Required 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 Required to Take Attendance – WD = midpoint or last date of an academically-related activity. The denominator = 109 days (35 x 3, plus 4 days between Modules).



# Program “Offered in Modules” – eff. 7/1/11

Module 1

Module 2

Module 3

Student enrolls for three 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 Required 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 Required to Take Attendance – WD = midpoint or last date of an academically-related activity. 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 events determined to be an academically-related activity 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

## How Does the 7/1/11 Effective Date Apply?

- The changes in 34 CFR 668.22 apply to
  - Students who withdraw from PP or POE that BEGIN on or after July 1, 2011
    - Therefore, do *not* apply to crossover PP that began prior to the effective date

QUESTIONS ???



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# Contact Information for Dan Klock

THANK YOU!

I appreciate your feedback & comments.

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