



Return of Title IV Funds: The Treatment of Modules



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**Return of Title IV Funds:
Treatment of Modules**



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Today's Agenda

- Explain when a program is considered to be offered in modules
- Describe how to determine when a student has withdrawn from a program offered in modules and the student's withdrawal date
- Explain how to calculate the percentage of the payment period or period of enrollment completed by the student

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Return of Title IV Funds: The Treatment of Modules

Program Offered in Modules

- Program is offered in modules if a course does not span the entire payment period or period of enrollment
- Determination of a program offered in modules:
 - Student specific
 - Made on payment period-by-payment period or enrollment period-by-enrollment period basis.

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Definition of Withdrawal [668.22(a)(2)(i)]

- For credit-hour program, student does not complete all days scheduled to complete in payment period or period of enrollment
- For clock-hour program, student does not complete all clock hours and weeks of instructional time scheduled to complete in payment period or period of enrollment
- For nonterm or nonstandard-term program, student is not scheduled to begin another course within payment period or period of enrollment for more than 45 calendar days after the module student ceased attending, unless student is on a Department of Education (ED) approved leave of absence (LOA)

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Determining Whether a Student Has Withdrawn from Program Offered in Modules

Student considered to have withdrawn if student ceases attendance at any point prior to completing the payment or enrollment period and school does not obtain student's written confirmation of attendance in a module later in that period

- If student enrolled in a nonterm or nonstandard term program, the later module must begin within 45 days of the end of the module student ceased attending

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Determining Whether a Student Has Withdrawn from a Program Offered in Modules

To make determination, ask three questions:

1. After beginning attendance in the payment period or period of enrollment, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

If answer is no, not a withdrawal

If answer is yes, go to question 2

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Determining Whether a Student Has Withdrawn from a Program Offered in Modules

2. When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

If answer is yes, not a withdrawal but other provisions for recalculation of student's award may apply

If answer is no, go to question 3

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Determining Whether a Student Has Withdrawn from a Program Offered in Modules

3. Did the student confirm attendance in a course in a module beginning later in the period (for nonterm and nonstandard term programs, this must be no later than 45 days after end of module student ceased attending)?

If answer is yes, not a withdrawal unless student does not return

If answer is no, this is a withdrawal and return of Title IV funds requirements apply

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Example: Lauren – Not a Withdrawal

Payment Period		
15- Week Semester		
Module 1 (5 weeks)	Module 2 (5 weeks)	Module 3 (5 weeks)

- Enrolled two 15-week courses, one course in Module 1, and one course in Module 2
- Withdrew from all courses on Day 30 of Module 1
- At time of withdrawal, provided written confirmation of intent to enroll in a course during Module 3

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Example: George – Withdrawal

Payment Period	
12-week course	
8-week course	4-week course

- Enrolled in three courses: 12-week course, 8-week course (weeks 1 through 8), and 4-week course (weeks 9 through 12)
- Completed the 8-week course
- Withdrew from 12-week and 4-week courses during Week 9, which was too late to add another course for the period

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Example: Lucia – Withdrawal

Payment Period	
Intersession (4 weeks)	Spring Semester (15-weeks)

- Semester-based program with optional 4-week intersession between the fall and spring semesters that school combines with spring semester into a single standard term
- Enrolled for one course during 4-week intersession and three courses during spring semester
- Withdrew on Day 3 of the 4-week intersession and did not provide written confirmation of future attendance in the period

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Example: Mary – Withdrawal

Payment Period				
Module 1 (6 weeks)	Break (2 days)	Module 2 (6 weeks)	Break (2 days)	Module 3 (6 weeks)

- Enrolled for all three modules
- After completing Module 1, withdraws on the day following the end of Module 1
- Did not provide written confirmation, at time of withdrawal, of future attendance in the period

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Determining the Withdrawal Date

- Same as for student withdrawing from a program not offered in modules
- If school required to take attendance and student confirmed future attendance in later module in period but does not return as expected, withdrawal date is date that would have applied had student not confirmed future attendance

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Example: Withdrawal from School Required to Take Attendance

Payment Period		
Module 1 (8/19/13 - 9/20/13)	Module 2 (9/23/13 - 10/25/13)	Module 3 (10/28/13 - 12/2/13)

- Student enrolled in all 3 modules, but withdraws on 9/20/13 after completing first module
- Although student provided written confirmation to return for Module 3, student fails to return
- Withdrawal date is 9/20/13

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Return of Title IV Funds: The Treatment of Modules

Determining the Withdrawal Date

- If unofficial withdrawal, calculate midpoint by counting all calendar days student expected to attend in period, excluding:
 - Scheduled breaks of at least five consecutive calendar days when student not scheduled to attend another course or module
 - Days student on an ED-approved leave of absence
- Regardless of whether school required to take attendance, must maintain documentation of student's withdrawal and school's determination student withdrew

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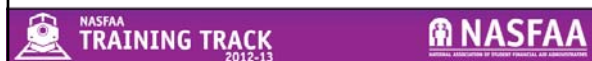


Example: Withdrawal Date is Midpoint

Payment Period				
Module 1 (34 days)	Break (2 days)	Module 2 (30 days)	Break (2 days)	Module 3 (34 days)

- Enrolled for Modules 1 & 2, dropped out during Module 1, and did not provide written confirmation of future attendance in period
- School uses midpoint as withdrawal date
66 days scheduled to attend + 2-day break = 68 days
Midpoint = $68 \div 2 = \text{Day 34}$

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Percentage of Period Completed: Credit-Hour Programs

$$\frac{\text{Days completed}}{\text{Days scheduled to complete}^*} = \boxed{\begin{array}{l} \% \text{ of Payment} \\ \text{Period or Period of} \\ \text{Enrollment} \\ \text{Completed} \end{array}}$$

*Prior to student's withdrawal, excluding days student on ED-approved LOA and scheduled breaks of at least 5 consecutive calendar days when student not scheduled to attend another course or module

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Return of Title IV Funds: The Treatment of Modules

Example 1: Percentage Completed of Credit-Hour Program

Module 1 35 days	Break 2 days	Module 2 35 days	Break 3 days	Module 3 35 days
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- Credit-hour program offered only in modules
- After completing Modules 1 & 2, student withdraws on day 5 of Module 3

Days completed = 80 Days in Period = 110

% completed = $80 \div 110 = .7272$, or 72.7% rounded down

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Example 2: Percentage Completed of Credit-Hour Program

Module 1 35 days	Break 5 days	Module 2 35 days	Module 3 35 days
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- Credit-hour program offered only in modules
- After completing Modules 1 & 2, student withdraws on day 5 of Module 3

Days completed = 80 Days in Period = 105

% completed = $80 \div 105 = .7619$, or 76.2% rounded up

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Percentage of Period Completed: Clock-Hour Programs

$$\frac{\text{Scheduled clock hours}^*}{\text{Clock hours in period}} = \boxed{\begin{array}{c} \% \text{ of Payment Period} \\ \text{or Period of} \\ \text{Enrollment Completed} \end{array}}$$

*To be completed at time of withdrawal and established prior to start of period; however, if student's schedule modified after start of period and before withdrawal, may use modified scheduled hours provided modification in accordance with accrediting agency and state licensing requirements

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Example: Percentage Completed of Clock-Hour Program

Payment Period		
Module 1 150 clock hours	Module 2 150 clock hours	Module 3 150 clock hours

- Student enrolled in all 3 modules, but withdraws during Module 1 after completing 30 clock hours
- At time of withdrawal, student was scheduled to have completed 45 clock hours

Scheduled clock hours = 45 Hours in Period = 450

% completed = $45 \div 450 = .1000$, or 10%

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Treatment of Students Who Re-Enter Period After Return Calculation Performed

For term-based program offered in modules, if student re-enters same payment period or period of enrollment, student considered not to have withdrawn

- School must undo return of Title IV funds calculation
- If student did not begin attendance in an entire module originally scheduled to attend, school must recalculate student award taking into account student's failure to begin attendance in that module

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Treatment of Students Who Re-Enter Period After Return Calculation Performed

If student re-enters same clock-hour or nonterm credit-hour program within 180 calendar days of his or her withdrawal, student considered:

- Not to have withdrawn
- In same payment period he or she was in at time of withdrawal
- School must undo return of Title IV funds calculation

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Questions?

Please send your questions to: welshe@nasfaa.org

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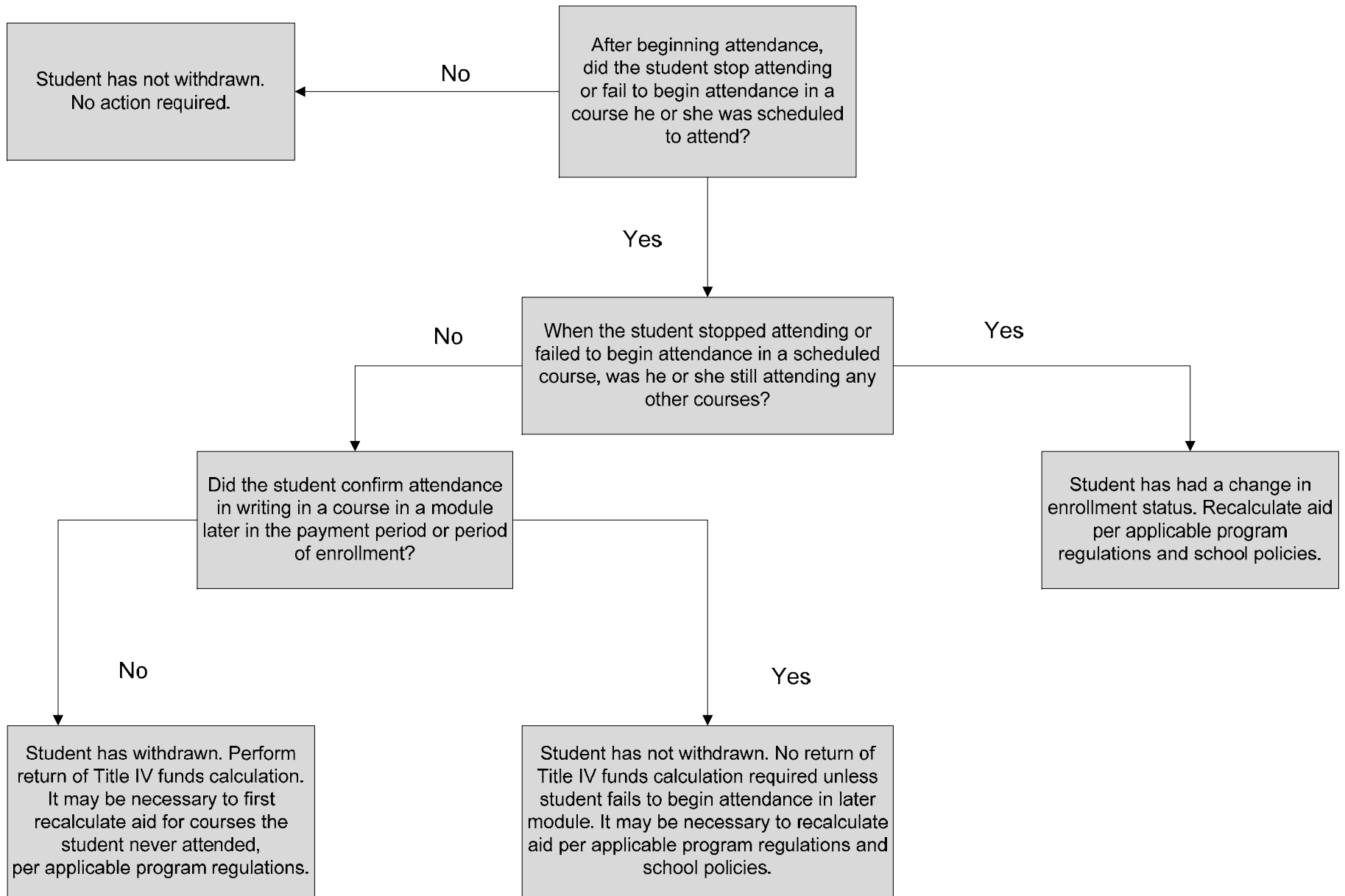
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Determining Whether a Student Has Withdrawn from a Program Offered in Modules



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