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• Describe how to determine when a student has withdrawn from a program offered in modules and the student’s withdrawal date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
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.

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)

Determining Whether a Student Has Withdrawn from Program Offered in Modules

Student considered to have withdrawn if student ceases attendance at any point prior to completing the payment or enrollment period and school does not obtain student’s written confirmation of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
Return of Title IV Funds: The Treatment of Modules

Determining Whether a Student Has Withdrawn from a Program Offered in Modules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

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

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

<table>
<thead>
<tr>
<th>Payment Period</th>
<th>15-Week Semester</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1 (5 weeks)</td>
<td>Module 2 (5 weeks)</td>
</tr>
</tbody>
</table>

- 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

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

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
Example: Mary – Withdrawal

<table>
<thead>
<tr>
<th>Payment Period</th>
<th>Module 1</th>
<th>Break</th>
<th>Module 2</th>
<th>Break</th>
<th>Module 3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(6 weeks)</td>
<td>(2 days)</td>
<td>(6 weeks)</td>
<td>(2 days)</td>
<td>(6 weeks)</td>
</tr>
</tbody>
</table>

- 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

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

Example: Withdrawal from School Required to Take Attendance

<table>
<thead>
<tr>
<th>Payment Period</th>
<th>Module 1</th>
<th>Module 2</th>
<th>Module 3</th>
</tr>
</thead>
</table>

- 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
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

Example: Withdrawal Date is Midpoint

<table>
<thead>
<tr>
<th>Payment Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1 (34 days)</td>
</tr>
</tbody>
</table>

- 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 ÷ 2 = Day 34

Percentage of Period Completed: Credit-Hour Programs

\[
\text{Days completed} \div \text{Days scheduled to complete}^* = \frac{\% \text{ of Payment Period or Period of Enrollment Completed}}{\%
\]

*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
Return of Title IV Funds: The Treatment of Modules

Example 1: Percentage Completed of Credit-Hour Program

<table>
<thead>
<tr>
<th>Module 1</th>
<th>Break</th>
<th>Module 2</th>
<th>Break</th>
<th>Module 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>35 days</td>
<td>2 days</td>
<td>35 days</td>
<td>3 days</td>
<td>35 days</td>
</tr>
</tbody>
</table>

- 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 = $\frac{80}{110} = 0.7272$, or $72.7\%$ rounded down

Example 2: Percentage Completed of Credit-Hour Program

<table>
<thead>
<tr>
<th>Module 1</th>
<th>Break</th>
<th>Module 2</th>
<th>Module 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>35 days</td>
<td>5 days</td>
<td>35 days</td>
<td>35 days</td>
</tr>
</tbody>
</table>

- 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 = $\frac{80}{105} = 0.7619$, or $76.2\%$ rounded up

Percentage of Period Completed: Clock-Hour Programs

\[
\text{Scheduled clock hours} * \quad \text{Clock hours in period} = \text{% of Payment Period or Period of Enrollment Completed}
\]

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

Example: Percentage Completed of Clock-Hour Program

<table>
<thead>
<tr>
<th>Payment Period</th>
<th>Module 1</th>
<th>Module 2</th>
<th>Module 3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>150 clock hours</td>
<td>150 clock hours</td>
<td>150 clock hours</td>
</tr>
</tbody>
</table>

• 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 ÷ 450 = .1000, or 10%

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

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
Questions?

Please send your questions to: welshe@nasfaa.org

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

- Student has not withdrawn. No action required.
- After beginning attendance, did the student stop attending or fail to begin attendance in a course he or she was scheduled to attend?
  - Yes
    - When the student stopped attending or failed to begin attendance in a scheduled course, was he or she still attending any other courses?
      - No
        - Student has withdrawn. Perform return of Title IV funds calculation. It may be necessary to first recalculate aid for courses the student never attended, per applicable program regulations.
      - Yes
        - Student has had a change in enrollment status. Recalculate aid per applicable program regulations and school policies.
    - No
      - Did the student confirm attendance in writing in a course in a module later in the payment period or period of enrollment?
        - No
          - Student has withdrawn. Perform return of Title IV funds calculation. It may be necessary to first recalculate aid for courses the student never attended, per applicable program regulations.
        - Yes
          - Student has not withdrawn. No return of Title IV funds calculation required unless student fails to begin attendance in later module. It may be necessary to recalculate aid per applicable program regulations and school policies.
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