



Return of Title IV: The Treatment of Modules



National Association of Student
Financial Aid Administrators

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National Association of Student
Financial Aid Administrators

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

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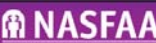
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Today's Agenda and Goals

- Explain when programs are considered to be offered in modules
- Describe how to determine when a student has withdrawn from a program offered in modules
- 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: The Treatment of Modules

**Programs Offered
In Modules**

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Programs Offered In Modules

A program is offered in modules if:

- One or more courses in an academic program do not span entire length of payment period or period of enrollment, or
- If program consists solely of modules

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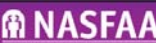
 

**Programs Offered In Modules:
Characteristics**

Number One

- If all courses in a program span the full length of the period, then for a student who withdraws during this period, the program is never considered to be offered in modules for that period

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Programs Offered In Modules: Characteristics

Number Two

- If none of the courses in a program span entire length of the period, then for a student who withdraws during this period, the program is always considered to be offered in modules for that period

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Programs Offered In Modules: Characteristics

Number Three

- If some courses in a program span entire length of a payment period or period of enrollment and some do not, the program is considered to be offered in modules only for a student who is scheduled to attend at least one course that does not span entire length of period, and withdraws during period

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Determining Whether or Not a Student has Withdrawn from a Program Offered in Modules

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Determining Whether or Not a Student has Withdrawn from a Program Offered in Modules: Ask 3 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?
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?
3. Did the student confirm attendance in a course in a module beginning later in the period?

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Example - Lauren

- Lauren is enrolled in a standard-term program with 16-week semesters.
- Each semester is comprised of four consecutive modules, each lasting four weeks. Students can enroll in one, four-credit class per module.
- For the semester, Lauren was initially enrolled for a class in each module. She completed the first two modules and began attendance in the third module.
- She withdrew from the third module on Day 8. She provided the financial aid office with written confirmation that she plans to attend the fourth module.

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Calculating the Percentage of the Payment Period or Period of Enrollment Completed by the Student

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Calculating the Percentage of the Payment Period or Period of Enrollment

$$\frac{\text{Numerator}}{\text{Denominator}} = \text{\% of Payment Period or Period of Enrollment Completed}$$



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Calculating the Percentage of the Payment Period or Period of Enrollment

- Numerator = Total days in the payment period or period of enrollment that the student has completed
- Denominator = Includes all days within period that the student was scheduled to complete prior to ceasing attendance

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Calculating the Percentage of the Payment Period or Period of Enrollment

Exclude from both numerator/denominator:

- Days in which the student was on an approved leave of absence
- Scheduled breaks of at least 5 consecutive days

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Calculation Example

5-Week Module	Break	5-Week Module	5-Week Module
---------------	-------	---------------	---------------

- Three, 5-week credit hour modules
- 4-day scheduled break after the first module
- Student completes 1 class in 1st and 2nd modules, withdraws day 5 of 3rd module

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Calculation Example

Numerator:

- 5 weeks x 7 days = 35 days in each module
- 35 days x 2 completed modules = 70 days
- 70 days + 5 days completed in 3rd module = 75 days
- 75 days + 4-day scheduled break = 79 days enrolled

Denominator

- 5 weeks x 7 days = 35 days
- 35 days x 3 modules = 105 days
- Add 4-day, scheduled break = 109 total calendar days

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Calculation Example

The percentage is:

- 79 total days enrolled ÷ 109 total calendar days = 0.7247 or 72.5% rounded up

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Calculating the Denominator

- The denominator includes all days within the period that the student was scheduled to complete *prior to ceasing attendance*
- Any enrollment adjustments made *after the student ceases attendance* are not included in the Return of Title IV calculation

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Scenarios

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Scenario: Sam, Standard-Term Program

16-Week Courses	
8-Week Course	8-Week Course

Sam is enrolled in two 16-week classes and in 1 class in each 8-week module

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Scenario: Sam, Standard-Term Program

16-Week Courses	
8-Week Course	8-Week Course

After completing the first 8-week module, Sam withdraws from his class in the second 8-week module on Day 12. He is still attending his two, 16-week classes.

- Is Sam enrolled in a program offered in modules?
 Yes No

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Scenario: Sam, Standard-Term Program

After beginning attendance, did the student stop attending or fail to begin attendance in a course he or she was scheduled to attend?

No

Yes

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Scenario: Sam, Standard-Term Program

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

No

Yes

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Scenario: Sam, Standard-Term Program

Student has had a change in enrollment status. Recalculate aid per applicable program regulations and school policies.

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Scenario: Belinda, Standard-Term Program

15-Week Course Enrolled		
5-Week Course Enrolled	5-Week Course Enrolled	5-Week Course Enrolled

Is Belinda enrolled in a program offered in modules?

Yes No

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Scenario: Belinda, Standard-Term Program

Belinda withdraws from all classes on Day 30 of the first module. No written confirmation of future attendance provided.

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Scenario: Belinda, Standard-Term Program

After beginning attendance, did the student stop attending or fail to begin attendance in a course she was scheduled to attend?

No Yes

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Scenario: Belinda, Standard-Term Program

Number of days Belinda attended

- Withdrew from all classes on Day 30 of the payment period

Total days attended = 30

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Scenario: Belinda, Standard-Term Program

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

No Yes

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Scenario: Belinda, Standard-Term Program

Did the student confirm attendance in writing for enrollment in a course in a module later in the payment period or period of enrollment?

No Yes

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Scenario: Belinda, Standard-Term Program

Student has withdrawn.
Perform Return of Title IV calculation.

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Scenario: Belinda, Standard-Term Program

The calculated numerator:

- Belinda has completed 30 days of enrollment. There is no scheduled break.
- Belinda's numerator is 30.

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Scenario: Belinda, Standard-Term Program

The denominator:

- Number of days in payment period
 - One 15-week course
 - Each module = 35 days
 - Scheduled to attend all 3 modules
- Number of days in the payment period = 105

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Scenario: Belinda, Standard-Term Program

- Percentage of payment period completed
 - $30 / 105 = 0.2857$
 - Round 0.2857 up to 0.286
 - $0.286 \times 100 = 28.6\%$
- Belinda completed 28.6% of payment period

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Scenario: William, Nonstandard-Term Program

Term 1		Term 2		Term 3		Term 4
10-Week Course	Scheduled Break One Week	6 Week Course	Scheduled Break One Week	10-Week Course	Scheduled Break One Week	6 Week Course
Enrolled 6 credits		Enrolled 6 credits		Enrolled 6 credits		Not enrolled

- The school defines the Title IV academic year as 24 credits over 32 weeks
- Because the terms in William's program are not substantially equal in length, each payment period in a full academic year is the amount of time it takes a student to complete both 12 credits and 16 weeks

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Scenario: William, Nonstandard-Term Program

Is William enrolled in a program offered in modules?

_____ Yes _____ No

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Scenario: William, Nonstandard-Term Program

William withdraws from his classes in Term Two on Day 35 of Term One

- Does the school have to perform a return of Title IV funds calculation?


_____ Yes _____ No

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Scenario: William, Nonstandard-Term Program

After beginning attendance, did the student stop attending or fail to begin attendance in a course he was scheduled to attend?


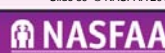


No



Yes

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Scenario: William, Nonstandard-Term Program

When the student stopped attending or failed to begin attendance in a scheduled course, was he still attending any other courses?

No Yes



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Scenario: William, Nonstandard-Term Program

Student has had a change in enrollment status. Recalculate aid per applicable program regulations and school policies.

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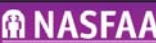
Scenario: William, Nonstandard-Term Program – Variation 2

William drops the classes during the one-week break between Term One and Term Two. He does not provide the school with written confirmation of his return.

- Does the school have to perform a return calculation?

_____ Yes _____ No

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Scenario: William, Nonstandard-Term Program – Variation 2

After beginning attendance, did the student stop attending or fail to begin attendance in a course he was scheduled to attend?

No Yes

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Scenario: William, Nonstandard-Term Program – Variation 2

When the student stopped attending or failed to begin attendance in a scheduled course, was he still attending any other courses?

No Yes

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Scenario: William, Nonstandard-Term Program – Variation 2

Did the student confirm attendance in writing for enrollment in a course in a module later in the payment period or period of enrollment?

No Yes

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Scenario: William, Nonstandard-Term Program – Variation 2

Student has withdrawn.
Perform Return of Title IV calculation.

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Scenario: William, Nonstandard-Term Program – Variation 2

Calculate the numerator:

- William completed Term 1, a 10-week term, which is 70 days
- Exclude scheduled break between Term 1 and Term 2 from both numerator and denominator
- Numerator = 70

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Scenario: William, Nonstandard-Term Program – Variation 2

Calculate the denominator:

- Term 1 is 70 days long
- Term 2 is 6 weeks long, or 42 days
- Total number of days in the payment period William was scheduled to attend is 112
- The denominator is 112

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Scenario: William, Nonstandard-Term Program – Variation 2

Calculate the percentage of the payment period

- $70 \div 112 = 0.625$
- $0.625 \times 100 = 62.5$ percent of the payment period

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Scenario: Mona, Nonterm Program

Class 1 6 weeks	Class 2 6 weeks
---------------------------	---------------------------

- Mona is enrolled in a nonterm program in which classes start every two weeks. Each class is six weeks long
- Academic year is 24 credits and 36 weeks. Each payment period is the amount of time it takes a student to complete both 12 credits and 18 weeks.

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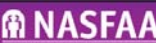



Scenario: Mona, Nonterm Program

Is Mona enrolled in a program offered in modules?

_____ Yes _____ No

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Scenario: Mona, Nonterm Program

Mona completes Class 1, but withdraws from Class 2 on Day 13

- Does the school have to perform a return of Title IV funds calculation?

_____ Yes _____ No

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Scenario: Mona, Nonterm Program

Number of days Mona attended

- 42 days in first class + 13 days in second class = 55 total days attended

Number of days in payment period

- 42 days in each class x 2 = 84 days

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Scenario: Mona, Nonterm Program

Percentage of the payment period completed

- $55/84 = 0.6547$
- Round 0.6547 up to 0.655
- $0.655 \times 100 = 65.5\%$

Mona completed 65.5% of the payment period

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Return of Title IV: The Treatment of Modules

Contact



Questions?
askregs@nasfaa.org

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TRAINING TRACK
2012-13

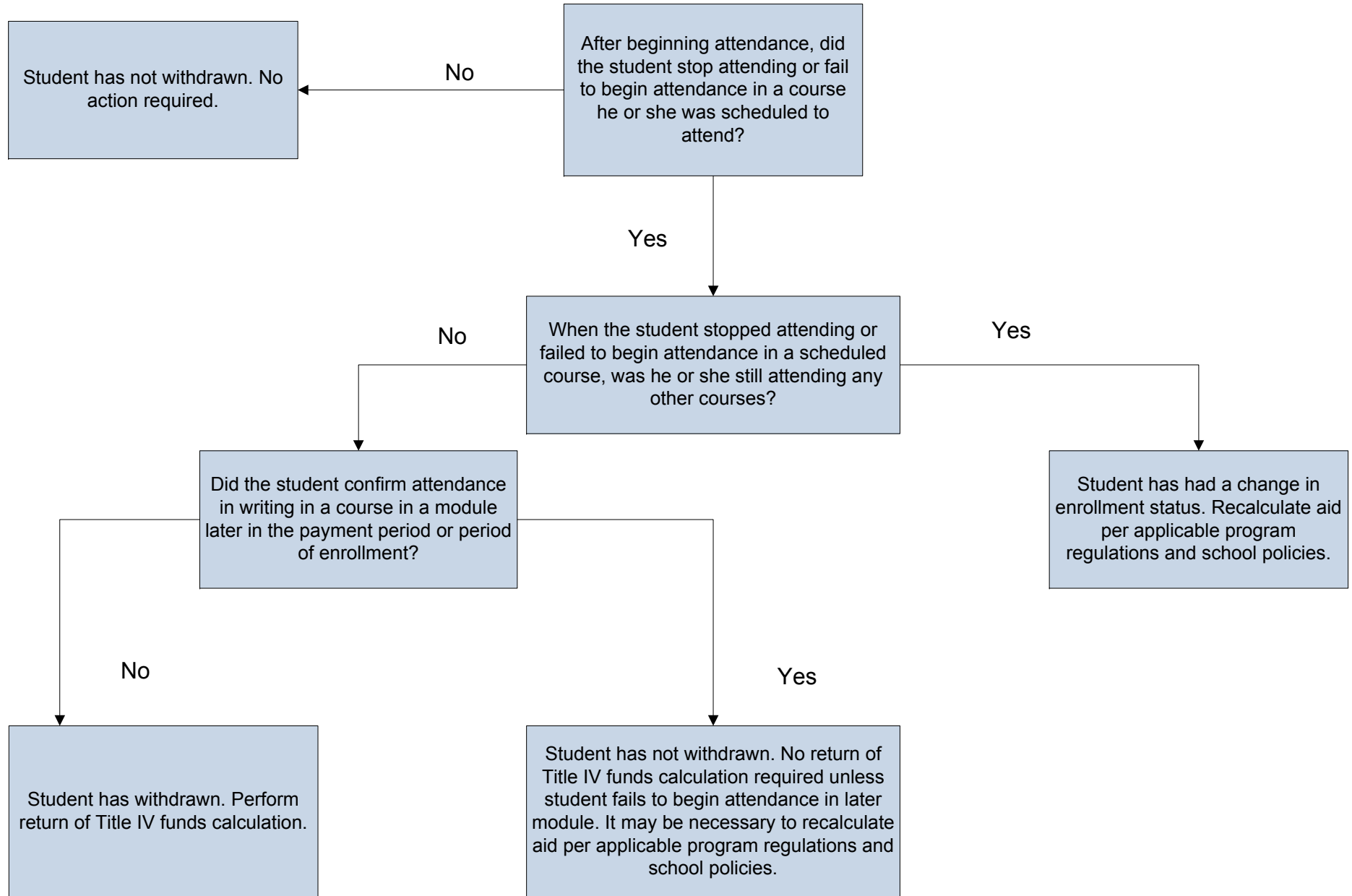
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Determining Whether or Not a Student Has Withdrawn From a Program Offered in Modules



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Q & A from NASFAA's Webinar

Return of Title IV Funds and the Treatment of Modules

March 21, 2012

Question	Answer
1. Our school uses a census date in the third week of the term for the recalculation of Federal Pell Grant awards. If a student is enrolled in the first and second modules of a term and drops her classes in the second module before the first module ends, the student has not withdrawn. However, must the school recalculate the student's Federal Pell Grant award since the census date has passed?	Please see 690.80(b). A school's use of a census date for determining whether or not it will make optional recalculations of Federal Pell Grant awards applies only to students who began attendance in all of their classes. If a student's projected enrollment status changes before she begins attendance in all of her classes, a school must recalculate a Federal Pell Grant award to reflect only the classes in which the student began attendance.
2. What is the definition of a module?	A module is a course or class that does not span the length of the payment period or period of enrollment.
3. What is the difference between payment period and period of enrollment?	<p>The definition of a payment period is found in 668.4. In general, a payment period is a school-defined length of time for which financial aid funds are paid to a student. For programs that use standard terms (semesters, trimesters, or quarters) or that use nonstandard terms that are substantially equal in length, the payment period equals the term. For programs not using academic terms, schools must designate at least two payment periods within an academic year. See the 2012-13 <i>FSA Handbook</i>, pp. 3-7 to 3-8.</p> <p>"Period of enrollment" is defined in 668.22(l)(2). A period of enrollment is the academic period established by the school for which institutional charges are generally assessed (i.e., the length of the student's program or the academic year) but consistent with the period for which loans generally are originated.</p>
4. Please explain when a withdrawn student is able to re-enter a program within 180 days and receive aid returned per a return of Title IV funds calculation.	Only students enrolled in credit hour nonterm programs and clock-hour programs have the ability to transfer into or re-enter a program within 180 days and remain in the same payment period they were in when they withdrew. These students would be eligible for any funds for the payment period that were returned based upon the return calculation completed when they withdrew or not disbursed as of their withdrawal date. For more information, please see pages 5-59 to 5-62 in the 2011-12 <i>FSA Handbook</i> .

Question	Answer
5. Does a student enrolled in a program offered in modules earn all of his or her Title IV aid if he or she completes more than 60% of the payment period or period of enrollment?	Yes.
6. Do the regulations regarding the treatment of modules and the return of Title IV funds apply to clock-hour programs?	Yes.
7. How do intercession courses (three-week courses in between regular terms) affect the return of Title IV funds when included in the following term's enrollment status?	Please see page 3-4 in the 2011–12 <i>FSA Handbook</i> . For a standard-term program, a school may combine a short nonstandard term with a standard term and treat the term as a single standard term. If a school combines a short intercession with the following spring term for students enrolled in the intercession, the total number of days in the payment period would be the sum of the days in the intercession and the days in the spring term.
8. If a school is not required to take attendance, how does it determine whether or not a student actually began attendance in the later module?	For Title IV purposes, attendance must be “attendance at an academically-related activity.” 668.22(l)(7) defines this term and provide examples of ways, other than taking attendance, that a school may use to document attendance in a later module.
9. If a student attends the only class he is registered for in a module for 2 minutes and then decides the class is not for him and withdraws immediately, is he considered to have begun attendance in the class?	The school is responsible for making such a determination of whether a student attended a class academically based on all the information available. ED will review these determinations to see if they are reasonable on a case-by-case basis. In order to count a student's engagement in a class as attendance for Title IV purposes, attendance should meet the definition of “academic attendance” or “attendance at an academically-related activity” as defined in 668.22(l)(7).
10. A student is enrolled in four 4-week classes that run one at a time in a 16 week semester and completes the 1st class or module, then he takes a 3 month Leave of Absence (LOA). Is R2T4 required since his return date is the beginning of the next 16 week semester?	A return of Title IV calculation is not required if the student's LOA meets the conditions of 668.22(d) which include the requirement that a LOA cannot exceed 180 days in a 12 month period.
11. If the student had registered for full time hours in a modular program and she withdrew after only attending less than half time hours, do you use a less than half time Pell Grant and 100% of the loans in completing the R2T4 calculation?	If a student withdraws before beginning attendance in the number of credit hours for which the Federal Pell Grant and campus-based funds were awarded, before performing the required return calculation, a school must recalculate the student's eligibility for Pell and campus-based funds based on a revised cost of education and enrollment status (690.80(b)(2)(ii)). The school then performs a return calculation using the student's revised award.



Question	Answer
11. (continued)	If the student withdraws before beginning attendance as a half-time student and the student had not received the first disbursement of Title IV loan before withdrawing, the school may not make the first disbursement because the school knows the student was never enrolled on at least a half-time basis. However, the loan would be included in the return of title IV calculation as “aid that could have been disbursed.”
12. For an online course, logging into an online class without active participation is not considered to be academic attendance. What constitutes “active” participation? Does logging in, clicking around inside the class, viewing the class without submitting discussion posts or assignments constitute “active” participation?	No. In a distance education context, documenting that a student has logged into an online class is not sufficient, by itself, to demonstrate academic attendance by the student. A school must demonstrate that a student participated in class or was otherwise engaged in an academically-related activity, such as by contributing to an online discussion or initiating contact with a faculty member to ask a course-related question.
13. If a student is enrolled in two classes for the 16 week period and 3 classes that last 4 weeks each, and withdraws from one of the 3 classes, is this program considered a program offered in modules?	Yes. If some of the courses in a program for a particular payment period or period of enrollment span the entire length of the period and some do not, the program is considered to be offered in modules only for a student who is scheduled to attend at least one course that does not span the entire length of the period.
14. We have 4 nonstandard 8 week terms in which the student completes 6 hours per term over the 32 weeks to complete their academic year. The student registers for each term separately toward the end of the current term and is charged separately for each term and financial aid is calculated term by term. Would these be considered modules or just nonstandard terms?	These are nonstandard terms as they are the school’s defined academic periods of enrollment. These are not modules as modules are courses in a program which do not span the entire length of a payment period or period of enrollment.
15. If a student is enrolled in two modules and withdraws from the first module, does the school have to reconfirm the student’s enrollment in the second module or is his continued enrollment sufficient?	Please see page 66893 of the preamble discussion to the Program Integrity Final Rule published in the <i>Federal Register</i> on 10/29/10. A school must obtain written confirmation of a student’s intention to attend a module later in the payment period or period of enrollment even if the student has already registered for subsequent classes. The school must obtain this confirmation when the student withdraws from a module.

Question	Answer
16. Please clarify the 45-day time period as it relates to confirming a student's attendance in a later module.	This 45-day time frame applies to students enrolled in nonterm and nonstandard term programs only. For students enrolled in programs with these structures, the later module must begin within 45 calendar days after the end of the module the student ceased attending. If the later module begins more than 45 calendar days after the end of the module the student ceased attending, the student has withdrawn and the school must perform a return of Title IV funds calculation.
17. A term consists of two modules with a one-week break between modules. If a student completes the first module and withdraws from the second module during the one-week break between modules, does the school have to perform a return of Title IV funds calculation?	Yes. A school must perform a return calculation because at the time the student withdrew from the second module, he was not attending any other classes. Please see the handout, <i>Determining Whether or not a Student has Withdrawn from a Program Offered in Modules</i> . Since the student never begin attendance in his class(es) in the second module, the school must recalculate a Federal Pell Grant award (if applicable) before completing the return calculation.
18. A student is enrolled in three consecutive modules. The student is enrolled for one, 3-hour class in each module. If she drops the 3-hour class in the third module does a R2T4 calculation need to be done if the student only receives federal student loans, since the student still took 6 hours?	Yes. A school is required to determine the earned and unearned portions of Title IV aid as of the date the student ceased attendance based on the amount of time the student spent in attendance. Up through the 60% point in each payment period or period of enrollment, a pro rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60% point in the payment period or period of enrollment, a student has earned 100% of the Title IV funds she was scheduled to receive during the period. Schools are still required to perform return calculations for students who withdraw after the 60% point in the period.
19. A student confirms attendance in a later module when she withdraws from an earlier module. What should the school do if the student subsequently drops the class in the later module before it begins?	The student has withdrawn. Before the school completes a return of Title IV funds calculation, it must recalculate, if necessary, a Federal Pell Grant award since the student did not began attendance in all the classes on which the original award was based. The school must use the new award amount in the return calculation. The student's withdrawal date would be the date she ceased attending the earlier module.
20. Does a school have to obtain written confirmation from a student that he or she will not be attending a future module?	No. A student is only required to provide written confirmation that he or she intends to attend a class in a later module. Absent written confirmation of future attendance, the student has withdrawn and the school should complete a return of Title IV funds calculation.

