



Return of Title IV Funds: Treatment of Modules

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

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Topics

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- How to determine when a student has withdrawn from a program offered in modules and the student's withdrawal date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

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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:
 - Is student-specific
 - Made on payment period-by-payment period or enrollment period-by-enrollment period basis

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Example: Program Offered in Modules

School's Academic Year								
Fall Semester (15 weeks)			Spring Semester (15 weeks)			Summer Term (8 weeks)		
5-week course	5-week course	5-week course	5-week course	5-week course	5-week course	4-week course	4-week course	
15-week course			15-week course			8-week course		

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Example: Program Offered in Modules

School's Academic Year								
Fall Semester (15 weeks)			Spring Semester (15 weeks)			Summer Term (8 weeks)		
5-week course	5-week course	5-week course	5-week course	5-week course	5-week course	4-week course	4-week course	
15-week course			15-week course			8-week course		
Student's Academic Year Enrollment								
Four 15-week courses One 5-week course			Four 15-week courses			Two 4-week courses		

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Program Offered in Modules

School's Academic Year								
Fall Semester (15 weeks)			Spring Semester (15 weeks)			Summer Term (8 weeks)		
5-week course	5-week course	5-week course	5-week course	5-week course	5-week course	4-week course	4-week course	
15-week course			15-week course			8-week course		
Student's Academic Year Enrollment								
Four 15-week courses One 5-week course			Four 15-week courses			Two 4-week courses		

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Definition of Withdrawal 34 CFR 668.22(a)(2)(i)

- Credit-hour program
 - Student does not complete all days scheduled to complete in payment period or period of enrollment
- 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
- 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 ED approved leave of absence (LOA)



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Determining Whether a Student Has Withdrawn from a 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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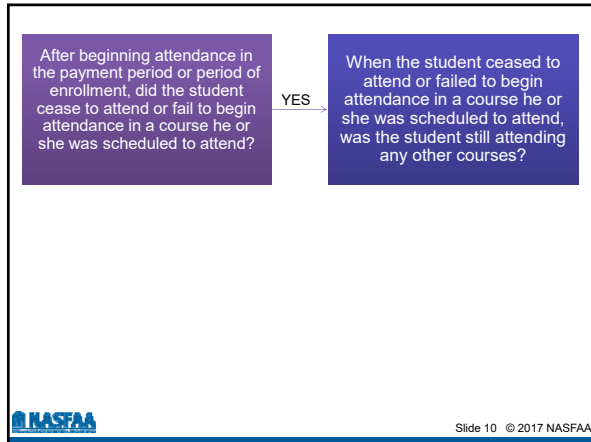
After beginning attendance in the payment period or period of enrollment, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

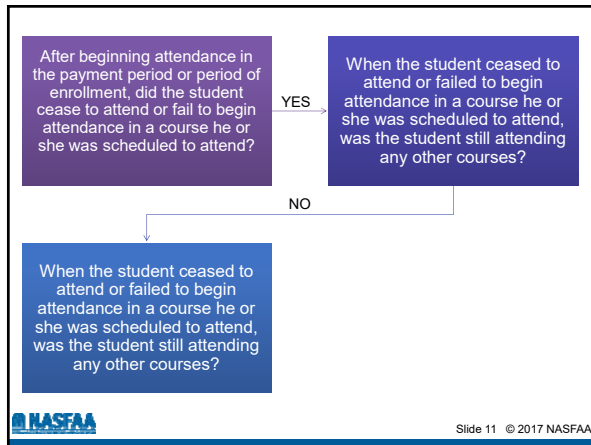


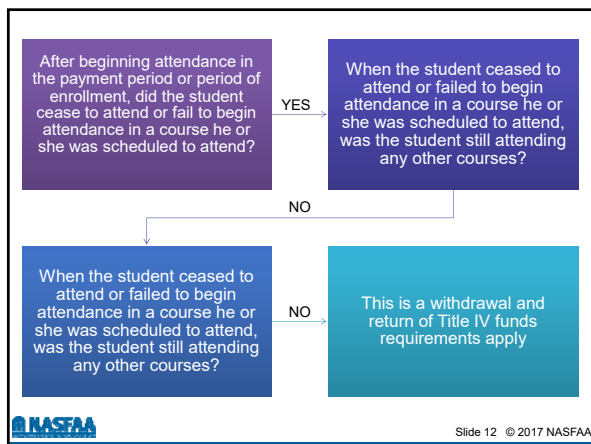
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Return of Title IV Funds: Treatment of Modules

Example: Lauren

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

Withdrawal – Day 30 → Written confirmation of intent to enroll

- 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

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

Withdrawal – Week 9

- Enrolled in three courses: 12-week course, 8-week course, and 4-week course
- 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

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

Withdrawal – Day 3 → No confirmation of future attendance

- 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

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

Withdrawal – Day 1 Break → No confirmation of future attendance

- Enrolled for all three modules
- Completes Module 1
- Withdraws the day following the end of Module 1
- Does not provide written confirmation of future attendance



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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 – 9/20)	Module 2 (9/23 – 10/25)	Module 3 (10/28 – 12/2)



- Student enrolled in all 3 modules
- Withdraws on 9/20 after completing first module
- Provides written confirmation to return for Module 3
- Fails to return



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Courses Offered in Modules Max's Example:

15-Week Payment Period		
Module 1 (5 weeks)	Module 2 (5 weeks)	Module 3 (5 weeks)
35 days	35 days	35 days

Max enrolls in all three modules. On Day 10 of Module 1, he withdraws from both modules 1 and 2, but provides written confirmation of attendance in module 3. Max begins module 3, but subsequently withdraws on day 5.

On Day 10, he is not considered a withdrawal

Number of days attended? **15**

Number of days scheduled to attend? **70**



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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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Counting Number of Days

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16 BREAK	17 BREAK	18 BREAK
19 BREAK	20	21	22	23	24	25

= 25 days



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Counting Number of Days

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11 BRE K
12 BRE K	13 BRE K	14 BREA	15 BREA	16 BRE K	17 BRE K	18 BRE K
19 BRE K	20	21	22	23	24	25

= 16 days

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Example: Courses Offered in Modules With Unofficial Withdrawal

Payment Period				
Module 1 (34 days)	Break (2 days)	Module 2 (30 days)	Break (2 days)	Module 3 (34 days)
<ul style="list-style-type: none"> Zach enrolls in modules 1 & 2 Stops attending during module 1 Does not provide written confirmation of future attendance in the payment period. 				
66 days scheduled to attend (including 2-day break)				
Midpoint = $66 \div 2 = \text{Day 33}$				

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Example: Courses Offered in Modules & Withdrawal Date is Midpoint

Payment Period				
Module 1 (34 days)	Break (2 days)	Module 2 (30 days)	Break (2 days)	Module 3 (34 days)
<ul style="list-style-type: none"> Student enrolls in modules 1, 2 & 3 Drops out sometime during module 1 Does not provide written confirmation of future attendance in the payment period 				
98 days scheduled to attend + 4 days break = 102 day				
Midpoint = $102 \div 2 = \text{Day 51}$				

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Return of Title IV Funds: Treatment of Modules

Percentage of Period Completed: Credit-Hour Programs

$$\frac{\text{Days completed}}{\text{Days scheduled to complete at withdrawal}} = \frac{\% \text{ of Payment Period or Period of Enrollment Completed}}{\% \text{ of Payment Period or Period of Enrollment Completed}}$$

Calculation excludes 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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Example: Determining Withdrawal Date for Courses Offered in Modules (school not required to take attendance)

Payment Period	
Module 1 June 1 - June 30	Module 2 July 3 - July 29

Laken and her friend Jake both enroll in modules 1 and 2. Laken officially withdraws on June 8 and does not provide written confirmation of her plans to attend module 2. Jake continues in the class for a while but ultimately quits going, without officially withdrawing. He confirms his plans to attend module 2.

Laken: WD Date? 6/8 Scheduled number of days? 59
Percent completed? $8 \div 59 = 13.6\%$

Jake: What if he does not begin module 2 as planned?



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Example: Percentage Completed of Credit-Hour Program

Module 1 35 days	Break 2 days	Module 2 35 days	Break 3 days	Module 3 35 days
----------------------------	------------------------	----------------------------	------------------------	----------------------------

↓
Withdrawal – Day 5

- Credit-hour program offered only in modules
- Completes Modules 1 & 2
- 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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Return of Title IV Funds: Treatment of Modules

Example: Percentage Completed of Credit-Hour Program

Module 1 35 days	Break 5 days	Module 2 35 days	Module 3 35 days
----------------------------	------------------------	----------------------------	----------------------------

↓
Withdrawal – Day 5

- Credit-hour program offered only in modules
- Completes Modules 1 & 2
- Withdraws on day 5 of Module 3

Days completed = 75 Days in Period = 105
 % completed = $75 \div 105 = .7142$, or 71.4% rounded down

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Percentage of Period Completed: Clock-Hour Programs

$\frac{\text{Scheduled clock hours}^*}{\text{Clock hours in period}} = \frac{\% \text{ of Payment Period or Period of Enrollment Completed}}{100}$
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*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

↓
Scheduled 45 clock hours

↓
Withdrawal - Completed 30 clock hours

- Student enrolled in all 3 modules
- 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 from AskRegs Knowledgebase



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Return of Title IV Funds: Treatment of Modules

Is a Return Calculation
Required if a Student
Completely Withdraws During
an Add/Drop Period and We
Refund All Charges?



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Scenario

- A student attends classes during our six-day add/drop period and does a complete withdrawal prior to the end of the add/drop period.
- Under our institutional refund policy, we cancel the student's registration and refund 100% of tuition and fees if a student withdraws before the end of the add/drop period.



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Answer

- Yes. As long as a student begins attendance in a payment period or period of enrollment, the student begins earning Title IV funds and R2T4 rules in [34 CFR 668.22](#) apply.
- The school must perform the R2T4 calculation if the student completely withdraws at any point prior to the 60 percent point of the payment period/period of enrollment.
- An R2T4 calculation is required **even if the student only attends classes for one day** or receives a full refund of institutional charges under institutional refund policies.



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Answer

- A student who begins attendance starts earning Title IV funds to pay, not only for institutional charges, but for noninstitutional charges, like off-campus room and board, books and supplies, transportation, and miscellaneous personal expenses.
- You must perform an R2T4 calculation and make any post-withdrawal disbursement of Title IV funds and deliver any Title IV credit balance for which the student is eligible as a result of that calculation.



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Is It a Withdrawal if the Student Completes a Module and Withdraws From All Future Modules on the Same Day?



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Scenario

- A student is enrolled in module 1 (8/22-10/16) and module 3 (10/24-12/18).
- The student completes module 1 and drops module 3 on 10/16.
- The student is attending no other modules in the term.




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Answer

- We have received guidance from ED stating if the student is completing the last day in module 1 when the classes in module 3 are dropped, the student is not considered a withdrawal for R2T4 purposes.
- The student is considered to be in attendance on that last day of module 1. Therefore, if all later modules are dropped while the student is still attending other classes (module 1), it is not a withdrawal. See page 5-63 of the [2016-17 FSA Handbook](#).


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Answer

- There might be confusion in ED's general guidance which states that a student who drops classes on the same day that he or she withdraws is considered a withdrawal (p. 5-67 of the *FSA Handbook*).
- But if the student is completing module 1 on that day, then it is not a withdrawal.

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What Start and End Dates Do We Use When a Student Withdraws From a Payment Period Containing Modules?

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Scenario

- Our payment periods are set up to be the full term (payment period 1: September to December, payment period 2: January to April).
- We have two modules in each payment period.



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Question 1

- If a student is only registered for module 2 in a payment period and then withdraws, do we change the dates for the R2T4 calculation to be the start of the module instead of the start of the payment period because they were not scheduled to attend the first 50 days?



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Answer 1

- If a student was only scheduled to attend module 2, you would only include the number of days in module 2 in the R2T4 calculation.
- Total days completed/total days in module 2
- Remember not to include any scheduled breaks of 5 days or more or the days in a Title IV-approved LOA.



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Question 2

- If a student is registered for both modules and then withdraws from module 1 and drops module 2 (never beginning attendance in module 2), do we adjust the dates in the R2T4 calculation to include only module 1?



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Answer 2

- Student was scheduled to attend both modules, so you use the total days in both modules 1 and 2 in the R2T4 calculation.
- The denominator would be the total days in modules 1 and 2, minus any scheduled breaks of 5 days or more or an approved LOA.
- The numerator will be the number of days the student completed in module 1 (including the date of withdrawal).



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Questions?



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