

# Return of Title IV Funds: The Treatment of Modules



## Return of Title IV Funds: The 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- Describe how to determine when a student has withdrawn from a program offered in modules and the student's withdrawal date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:
  - 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

Student's Academic Year Enrollment							
Fall Semester			Spring Semester			Summer Term	
Four 15-week courses			Four 15-week courses			8-week course	
Module 1	Module 2	Module 3	Module 1	Module 2	Module 3	Module 1 One course	Module 2 One course

- Fall and spring semesters, student not enrolled in program offered in modules
- Summer term, student enrolled in program offered in modules

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Example: Program Offered in Modules

Student's Academic Year Enrollment							
Fall Semester			Spring Semester			Summer Term	
One 15-week courses			Four 15-week courses			8-week course	
Module 1 One course	Module 2 One Course	Module 3 One Course	Module 1	Module 2	Module 3	Module 1 One course	Module 2 One Course

- Fall– enrolled in program offered in modules
- Spring – not enrolled in a program offered in modules
- Summer –enrolled in program offered in modules

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Example: Program Offered in Modules

Alex's Academic Year Enrollment		
Fall Semester (15 weeks)	Spring Semester (15 weeks)	Summer Term (8 weeks)
Two 15-week courses Two 5-week courses	One 15-week course Three 5-week courses	Two 8-week courses

Rachel's Academic Year Enrollment		
Fall Semester (15 weeks)	Spring Semester (15 weeks)	Summer Term (8 weeks)
Four 15-week courses	Four 15-week courses	Two 4-week courses

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# Return of Title IV Funds: The Treatment of Modules

## 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 Department of Education (ED) approved leave of absence (LOA)

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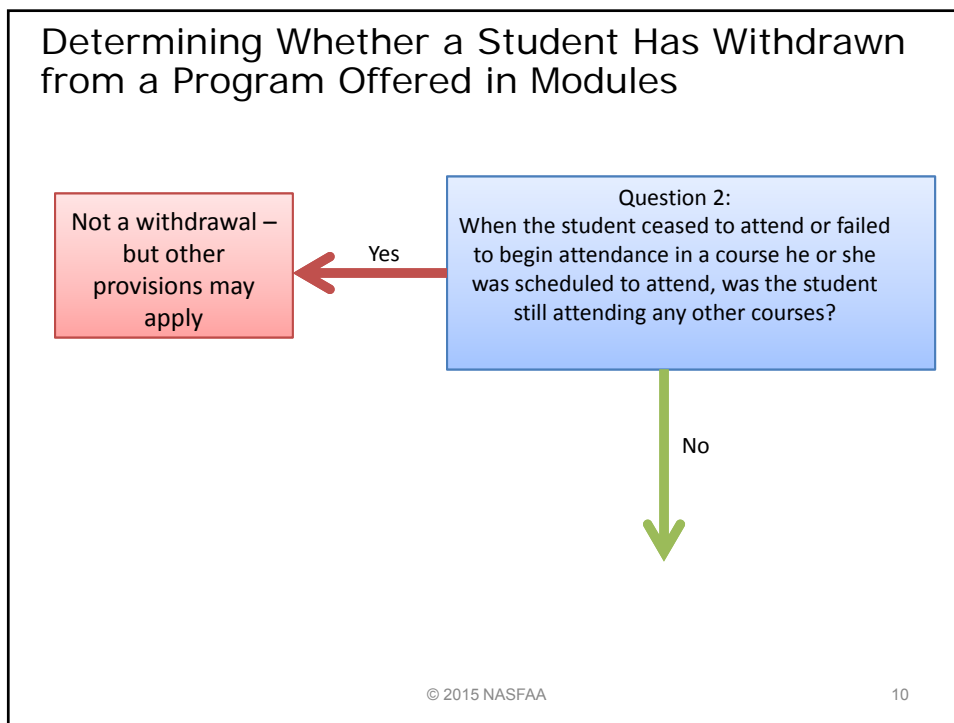
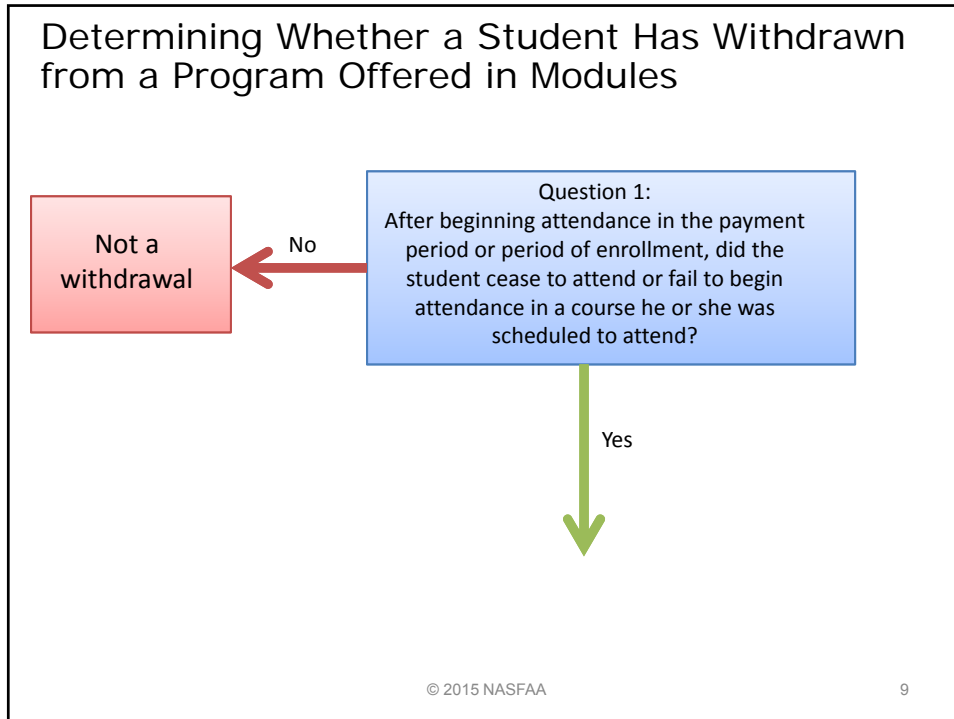
## Determining Whether a Student Has Withdrawn from a Program Offered in Modules

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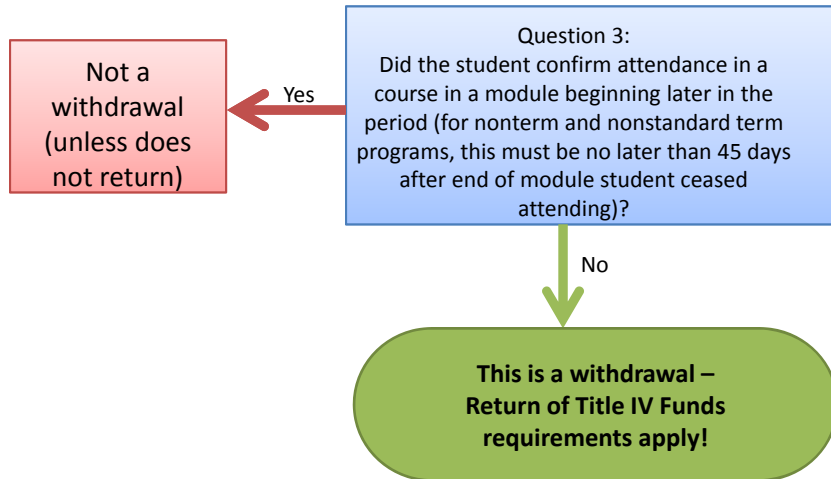
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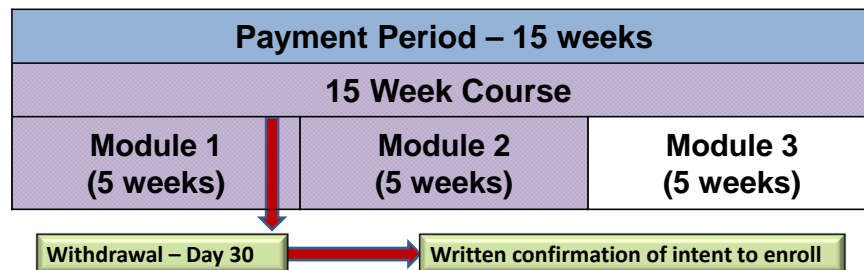
## Determining Whether a Student Has Withdrawn from a Program Offered in Modules



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## Example: Lauren



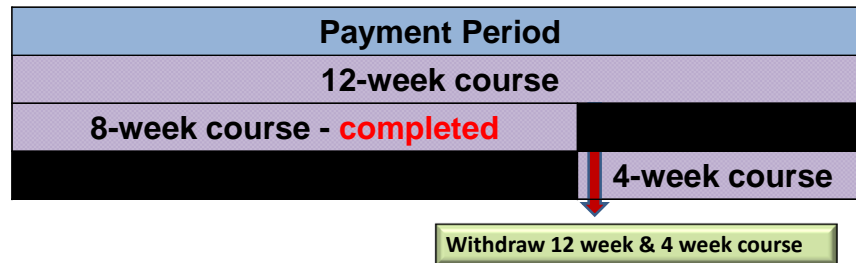
- Enrolled two 15-week courses, one course in Module 1, and one course in Module 2
- Withdrew from all courses on Day 30 of Module 1
- At time of withdrawal, provided written confirmation of intent to enroll in a course during Module 3

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Example: George

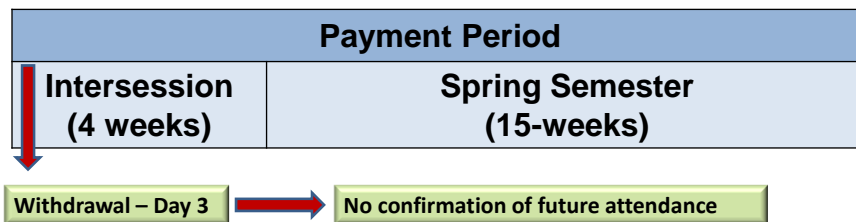


- Enrolled in three courses: 12-week course, 8-week course, and 4-week course
- Completed the 8-week course
- Withdrew from 12-week and 4-week courses during Week 9, which was too late to add another course for the period

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Example: Lucia



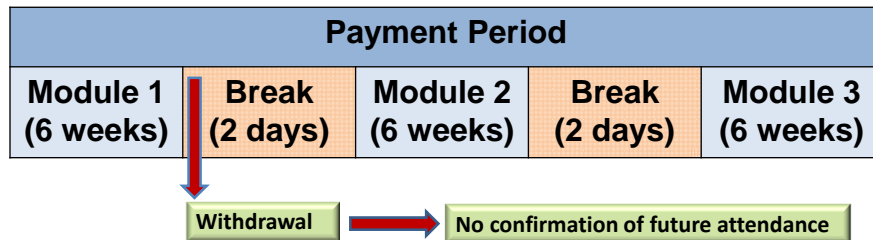
- Semester-based program with optional 4-week interession between the fall and spring semesters that school combines with spring semester into a single standard term
- Enrolled for one course during 4-week interession and three courses during spring semester
- Withdrew on Day 3 of the 4-week interession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

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Example: Mary



- Enrolled for all three modules
- Completes 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

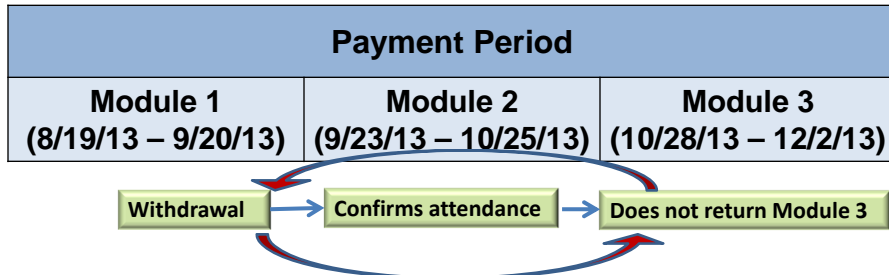
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# Return of Title IV Funds: The Treatment of Modules

Example: Withdrawal from School  
Required to Take Attendance



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

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## Unofficial Withdrawal



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## Unofficial Withdrawal – Determining the Withdrawal Date

- School not required to take attendance:
  - Midpoint: calculate midpoint by counting all calendar days student expected to attend in period, excluding scheduled breaks  $\geq 5$  consecutive days or days when on an ED-approved leave of absence
  - May always use the last date of attendance instead of the midpoint
- 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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## Unofficial Withdrawal – Determining the Withdrawal Date

- School required to take attendance:
  - Last date of attendance at an academically related activity includes, but is not limited to:
    - Physically attending a class
    - Submitting an academic assignment
    - Taking exam, completing interactive tutorial
    - Attending a school-assigned study group
    - Participating in an online discussion about academic matters
    - Initiating contact with instructor to ask question about course

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## Official Withdrawal – Determining the Withdrawal Date

- School not required to take attendance
  - Determination of withdrawal date same for modular or non-modular programs
  - Date the student notified school of intent to withdraw
- School required to take attendance
  - Always uses the date of last academically relative activity

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## Example: Withdrawal Date is Midpoint

Payment Period				
<b>Module 1 (34 days)</b>	<b>Break (2 days)</b>	<b>Module 2 (30 days)</b>	<b>Break (2 days)</b>	<b>Module 3 (34 days)</b>

- Enrolled for Modules 1 & 2
- Dropped out during Module 1
- No written confirmation of future attendance in period
- School uses midpoint as withdrawal date
  - 64 days scheduled to attend + 2-day break = 66 days
  - Midpoint =  $66 \div 2 = \text{Day 33}$

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Percentage of Period Completed:  
Credit-Hour Programs

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

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 1: Percentage Completed of  
Credit-Hour Program

Payment Period				
Module 1 35 days	Break 2 days	Module 2 35 days	Break 3 days	Module 3 35 days

↓  
Withdrawal

- Credit-hour program offered only in modules
- Scheduled to attend Modules 1, 2, & 3
- 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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## Example 2: Percentage Completed of Credit-Hour Program

Payment Period			
Module 1 35 days	Break 5 days	Module 2 35 days	Module 3 35 days

↓  
Withdrawal

- Credit-hour program offered only in modules
- Scheduled to attend Modules 1, 2, & 3
- 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

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

\*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

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Example: Percentage Completed of  
Clock-Hour Program

Payment Period		
<b>Module 1</b> 150 clock hours	<b>Module 2</b> 150 clock hours	<b>Module 3</b> 150 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 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

Term-based program offered in modules – 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 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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# Return of Title IV Funds: The Treatment of Modules

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

Clock-hour or nonterm credit-hour – re-enters 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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Please send your questions to:  
[sharpa@nasfaa.org](mailto:sharpa@nasfaa.org)

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

