

PSC-ED-FSA-TISD

**Moderator: Angie Beatty
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12:30 pm CT**

Coordinator: Welcome and thank you for standing by. All participants are in a listen-only mode for today's conference. Today's conference is being recorded. If there are any objections, please disconnect at this time.

At this time, for opening remarks and introductions, I'd like to turn the conference over to Suzanne Scheldt.

Suzanne Scheldt: Thank you. Good afternoon or good morning depending on where you are in the country. My name is Suzanne Scheldt and I'm a training officer with the Department of Education in Seattle, Washington. I want to welcome you to the U.S. Department of Education's 2012 Fall Webinar Training Series.

This training consists of four sessions. Session 3, Return of Title IV for Modules, is what we're doing today. The remaining three sessions -- Campus-Based Issues, Return of Title IV for Clock Hours, and Clock-Hour Issues -- comprise the balance of our training series. They will be offered on successive dates throughout this week, and again, during the week of October 14. Please refer to our Dear Colleague Letter Announcement 12-21 for dates, times, and registration information.

Our presenters today will be Sandy Santana and Natasha Webb, both training officers in our New York office. We do have a handout of the slides available for you. Please go to the top of your toolbar on the right-hand side and click the icon which looks like three white pieces of paper. A box will open that will allow you to download the handout to your own computer from which you can then print the handout. It will print from the Web site.

Because of the large number of people with us today, it is not practical to have the phone lines open for question. However, you can submit your questions electronically. Just click on the Q&A tab, type in your question, and click on the word Ask. Please do not click on the raised hand as it is not functional in this venue.

We have question managers who will be responding to questions received through this process during the webinar. If time permits, at the conclusion of the presentation, we will read some of your questions aloud and provide answers to everyone.

Without further delay, I'd like to turn the call over to Natasha.

Natasha Webb: Thank you, Suzanne. And, again, my name is Natasha Webb out of the New York Regional Office. And I am pleased to be one of your presenters today.

Today's training session will focus on Return of Title IV funds within a credit hour module setting. We will discuss concepts and definitions attributable to the R2T4 and modules. We will discuss common examples associated with students withdrawn from modules, and then provide some questions and answers related to the R2T4 and the modules.

So we have a lot to cover, so we're going to go ahead and get started with our first slide. The R2T4 calculation has as its basic premise that a student earns Title IV through attendance in school. We calculate the percentage of the period of enrollment that the student attended and that becomes the percentage of the aid the student has earned.

So we're going to take a look at how R2T4 works, and the basic concept is as follows. If the school has disbursed more aid than the student has earned, money is returned to the program. If the school has disbursed less aid than the student has earned, a post-withdrawal disbursement will be calculated.

A post-withdrawal of grant funds is made to first pay any outstanding charges owed to the school by the student. And in the excess grant funds are disbursed grant funds are disbursed directly to the student. A school must first obtain the borrower's confirmation to make a post-withdrawal disbursement of Title IV loan funds.

Now that is the background information on R2T4. We're going to look at the log sheet and then calculate the steps. The calculation has ten steps, and we show this on this worksheet here on this slide. We're actually showing you all of the steps.

So in Step 1, you are putting in all the Title IV aid for the period of enrollment. Note that Federal Work-Study is not included because that is money that the student has earned. In Step 2, you are determining the student's withdrawal date and the percentage of the period that the student attended. In Step 3, it takes the percentage and uses it as a percentage of aid that the student has earned. It is then multiplied by the total aid from Step 1, and the result is the aid earned by the student.

Now, in Step 4, you determine if they will be return of funds, a post-withdrawal disbursement, or no action at all. Step 5 looks at institutional charges and determines how much of the return liability belongs to the school. In Step 6, we see the statutory order for the return of funds and school's return liability is divided between the Title IV programs.

Now, steps seven through 10 calculate any immediate repayment of funds due from the student. Remember that there is a grant protection of 50% in Step 9, which helps to decrease the student's liability. Also remember that any Direct Loan funds are repaid by the student according to the terms of the promissory note. So there is no immediate repayment on Direct Loan.

It is very important to keep up with the requirements and the deadlines to complete the R2T4 process. The particular date requirements listed on this slide are triggered by the date the school determines when the student withdrew. In other words, the date of your school's determination that the student is - or withdrew starts the actual clock.

Schools need a device or method to track these requirements to ensure compliance. Violating a requirement are some of the most frequent program review findings as well as audit findings. So keep that in mind as well.

The 45-day time frame to return funds, it includes the 30-day period to perform a calculation and provide any notifications. So that 45-day time frame to return funds, it includes the 30-day period to perform the calculations and provide any notifications.

Now, when we look at withdrawal dates, the new regulations have further defined a school that is required to take attendance for R2T4 purposes. To include the current requirements that a school that is required by an outside

entity to take attendance is also considered required to take attendance for R2T4 purposes.

In addition, if the school has an internal requirement that faculty take attendance, it is required to take attendance to establish the last day of attendance for R2T4 purposes. This applies whether the requirement to take attendance is school wide by program of study or by academic department. The attendance reports that attendance records must be used to determine the date of withdrawal for R2T4. However, if the school has no such requirement but a faculty member voluntarily chooses to take attendance then the school is not considered required to take attendance for R2T4 purposes.

And lastly, if an outside entity or the school has a requirement that can only be met by taking attendance or comparable process, including but not limited to, requirement that a student in a program demonstrate attendance in classes of that program or even a portion of that program then the school is considered to be required to take attendance for R2T4 purposes as well.

The department is aware that the Department of Veterans Affairs may require recipients of VA benefits to self report attendance. We do not consider this required to take attendance unless the school must verify the student's self certification.

We also know many schools have established a policy that requires faculty to report last day of attendance for students who leave during the drop-add periods. The department does not consider a school with such a policy as a school that is required to take attendance and these new rules would not apply.

When attendance taken is limited to some students, those attendance records must be used to determine withdrawal dates for those students. We know the

situation with a school requires faculty to take attendance for all 100 and 200-level courses. That means if a student is enrolled only in 100 and 200-level courses and completely withdraws, the attendance records must be used to determine the student's withdrawal date.

If the student is enrolled in 100 and 200-level courses concurrently with courses at other level, the student's withdrawal date would be determined using the rules for a school that is not required to take attendance. If the taking of attendance is required for only a limited period of time and a student withdraws during that period, the withdrawal date must be determined using the attendance records.

For students in attendance at the end of the period, withdrawal dates would be determined using the rules of schools not required to take attendance. You will be required to document that the student who is in attendance after the limited period has elapsed.

If the student officially withdrew two weeks after the end of that limited period of attendance taken, the withdrawal date would have to be the last date of documented attendance unless the school could (finish rate) was the student was in attendance after attendance taken had ended. The regulation specifies that if any attendance is required to be taken on only one specific day for me to send this report, we do not consider that school to be required to take attendance either.

Now, I'm looking at schools who are not required to take attendance. Now, when a school is not required to take attendance, the withdrawal date is, as you see from the screen, the earlier of the date the student began the school's withdrawal process, or the date the student otherwise provided official notice, or if the student did not notify the school, the withdrawal date is the midpoint

in that period. Or if the student did not notify due to circumstances beyond the student's control, the withdrawal date is the date related to that particular circumstance.

A school not required to take attendance always has the option of using the date of a student's last participation in academically related activity as long as that participation is documented by a campus official. Our regulations 668.22 L7 define academic attendance an attendance at an academically related activity to include the following -- a student physically attended the class where there is opportunity for direct interaction between instructor and student; submitting an academic assignment; taking an exam; or computer-assisted instruction; or participating in an online discussion about academic matters. Academically related activity does not include living in institutional housing, participating in academic counseling, or logging on to an online class without active participation.

Now that we've talked about schools required or not required to take attendance, let's take a look at the withdrawal dates when a school is required to take attendance and when it's not. Now, from the example you see on the screen, this is a term made up of three modules. Now, each module is 33 days in length. There is a weekend in which it consists of two days between each module. The total number of days would be 33 times three. So, 99 days in a three modules plus the two Saturdays and two Sundays in between gives us 103 days.

Let's say Cheryl enrolled for all three modules beginning - and she began module one and she's successfully completed that. She does not attend module two, she does not attend module 3, and provides no notification to the school. If the student - I'm sorry, if the school is required to take attendance, Cheryl's withdrawal date would be the last day of attendance in module one.

(Unintelligible) the day she took the final exam as documented by the school's attendance records. Let's say that it's day 33, so that would mean that 33 days divided by 103 days, gives us 0.320 or 32%. If the school is not required to take attendance, the school has a choice for Cheryl's withdrawal date. The school may use either the calendar midpoint of the combined term or Cheryl's last date of documents and attendance at an academically related activity.

The calendar midpoint of the 103 total days would be, say, 51. So if the school uses that, it would be 51 days divided by 103 days, giving us 0.495 or 49.5%. Notice that the refund difference will be substantial depending on the method that you use.

Now, in this example, we have a little twist on the same modular situation. Specifically, let's look at how we count phase. The schedule has a week break between modules one and two, and between modules two and three. A week break would really be nine consecutive days because of the weekends.

Now, let's take a look at Anthony. Anthony also enrolls in all three modules just like Cheryl. He begins and he successfully completes module one. Now, Anthony does not attend modules two and three, and does not contact the school. His last day of attendance is the final exam of module one, day 33.

This scenario is 33 days divided by 99 in that total period. We do not count the nine-day break in between each module that week is a consecutive break of five days or more. But the calculation would be 33 over 99, or 0.333, 33%.

If the school is not required to take attendance, the school has a choice for Anthony's withdrawal date. The school may use either the calendar midpoint of the combined term, or Anthony's last date of documented attendance at an

academically related activity. The calendar midpoint of the 99 total days would be day 50. But the school uses that, it would be 50 days divided by 99 days, giving us 0.505, or 50.5%.

And you will notice that even the calendar midpoint in this scenario does not come out to an even 50% because there are an odd number of days in the period of enrollment. We must use the exact percentages here.

Now, we move to definitions and it is important to review some basic definitions about programs that are offered in credit hours. When we talk about terms, we have both standard and non-standard terms. A standard term is a semester, trimester, or quarter, all courses to start and end within the same set time frame. An academic calendar that you measured in semesters or trimesters typically has two terms in its academic year. And each term is generally between 14 and 17 weeks of instruction.

A quarter based program has three terms in its academic year and each quarter is generally between ten and 12 weeks of instructions. Non-standard terms are terms where the coursework does not begin and end within a set period of time. But that time period does not meet the definitions we just discussed.

Non-term credit hour programs do not have courses that begin and end with set periods. Students may work according to their own pace, courses may overlap, or courses may be a lockstep.

To continue with definition, we look at a week of instructional time. And a week of instructional time is any period of seven consecutive days during which at least one day of scheduled instruction or exam occurs. Do not count homework time, vacation time, orientation, and counseling sessions as instructional time.

Okay, we've gone through definitions. And now, we're going to really take a look at the programs and courses offered in modules. Now, the new R2T4 regulations made changes to the programs that are offered in the modules. The Department believes that the new regulations more accurately reflect the Higher Education Act requirement that R2T4 apply to any recipient of Title IV aid who withdraws from the institutions during the payment period or period of enrollment in which the student began attendance.

And again, for these examples, we are working only with credit hour programs. And if you would like to do any further reading on these modules, there are additional Q&As regarding the program's offer in their colleague which is located on IFAP. It is dated July 20, 2011, and is listed as DCL GEN-11-14. Additional Qs and As can also be found on the Program Integrity Web site.

Now, a program is considered to be offered in modules if there is a course or courses that do not span the entire list of the payment period or period of enrollment. Keep in mind that the regulation applies whether (your) school uses the term module, whether you use many terms, whether you call them sessions, mini sessions, parts of a term, et cetera. Being a standard time institution does not exempt from these modular R2T4 regs especially if you had any courses that do not span the entire length of a standard term.

Now, on this screen are examples of a standard term schedule that will be considered to be offered in modules. And we have examples of two eight sessions within a 16-week semester. We have three five-week sessions within a 15-week semester. We have two six-week sessions within a 12-week quarter. And a winter intercession, or what could be considered a (jay term) between fall and spring semesters.

In this modular scenario, a student is considered to be withdrawn if the student does not complete all the days that he or she was scheduled to complete within the payment period or term. This is very different from the previous regulation with a student who completed a course anytime during the period was not considered to be withdrawn.

Remember that the R2T4 calculations for credit hours looks at the number of days that the student attended as compared to the total number of days that in the period of enrollment. It has nothing to do with the number of courses for which the student enrolled. So it makes sense that we would look at the days as opposed to the courses.

Documentation of course completion is evident when a student has earned a passing grade in a course. Passing grades in all courses a student was scheduled to attend during the period reflect completion of the period. If the student does not receive a passing grade in his last scheduled course, the school must demonstrate that the course was otherwise completed.

Your school may have a grading policy which differentiates between courses completed but failed, which is called an earned F, in courses not completed. If not, you must consult with faculty to determine if the student is considered to have completed the course. Was the F grade an earned F grade, or not? More guidance on this, on how to deal with non-passing grades, can be found in one of our Dear Colleagues that is listed as GEN-04-03. And this will help you with making determination about your grading policy.

The new regulations also provide that a student withdraws from - if a student withdraws from a term-based credit hour program offered in modules during the payment period and then they reenter the same program before the end of

the period, the student remains in the same payment period when she returns. That student is again eligible for Title IV funds for which she was eligible prior to withdrawing including any funds that were returned by the school provided that student's enrollment status continues to support the level of funding.

The regulations also include guidance from Dear Colleague GEN-00-24 that a student will not be considered a withdrawal if he or she ceases attendance but the institution obtains written confirmation from the student at the time of withdrawal that he or she will attend a module later in the period of enrollment.

In this instance, pre-registration for the later module is not confirmation of intent to return. The confirmation must be obtained at the time of withdrawal for at least prior to the time when the institution would be required to return any unearned funds or offer any post-withdrawal disbursements.

The regulation also allows for a student to change his or her return date if a student does intend to return to a module that begins even later in the same payment period. However, the change must be provided in writing before they initially confirm returned aid. In a standard term scenario, the student must return before the end of the payment period or a period of enrollment.

Now, for non-term and non-standard term programs, the student must intend to return in a module that begins within 45 calendar days after the end of the module during which the student ceased attendance. A student who intends the return after 45 calendar days, they will be considered a withdrawal. Any change to return date must still be within that 45 calendar days after the end of the module during which the student ceased attendance. That 45-day rule does

not apply in the standard-term calendar with modules. This is just for non-term and non-standard term programs.

At any time that a student does not return after providing a written confirmation of intent to return, the student is considered to be withdrawn. It is important to note that the withdrawal date and total days are determined as if the confirmation of intent to return had not been obtained at all.

And then when (conforming) an R2T4 cancellation for a credit hour program, the total number of calendar days in the payment period or period of enrollment includes all days within the period that the student was scheduled to complete. The days of any course the student completes also account if that course did not span the entire length of the term.

Scheduled breaks of at least five consecutive days when a student is not scheduled to attend a module or other course are excluded from the total number of days and/or the days completed in that period.

The second bullet on this slide addresses scheduled changes made by the student prior to the complete withdrawal. Any courses that will officially drop before the student's cease attendance are not days that the student was scheduled to attend. Assuming the student is not remained enrolled in other courses on those days.

Correspondingly, courses that were officially added before the student ceases attendance are counted as days in which the student was scheduled to attend. For example, the student withdraws summer course that lasts 30 days on the 12th day. Do not count the remaining 18 days of that course in the days from which the student was enrolled, or scheduled to attend.

And now, I am going to stop and I will turn the remainder of this training over to Sandy who will show some examples of R2T4 and the modules. Sandy?

Sandy Santana: Thank you, Tasha. The new R2T4 Regulations made changes to programs that are offered in modules. The Department believes that the new regulations more accurately reflect the HEA requirement that R2T4 applied to any recipient of Title IV aid who withdraws from an institution during the payment period or period of enrollment in which student begins attendance. Additional Q&A regarding programs offered in modules can be found in the Dear Colleague Letter GEN-11-14, dated July 20, 2011.

Here is our first example, it's a summer module example, and we have a school that we'll call Business Times University. So at Business Times University, the fall and spring semesters are regular semesters, meaning that all courses, less the full 15 weeks of the semester. But the school summer term is really three five-week sessions offered consecutively.

The aid office combines them into a term for Title IV purposes. In the summer, a student may enroll in any of the three sessions or a combination of them. Because these five-week courses do not span the entire length of the term, 15 weeks, this is considered to be modular.

Here's a visual, three five-week sessions of 33 days each with two days of no school in between modules, the weekends. Our student enrolls four course in each of the three sessions. He completes his course in session one. The student begins session two, but stops attending after ten days and withdraws from session two.

At this point, the student is entitled for withdrawal, and an R2T4 calculation must be done. This is very different from the prior rules that would be before

7/1/11 that did not consider the student to be a Title IV withdrawal because he had completed a course in the term.

The period of enrollment is the entire 103 days of the combined summer term. That means the student attended for 43.7% of the term. But we said the student was enrolled for session three. The student's pre registration for the third session is not enough to override the R2T4 requirement. However, if the school collects written confirmation from the student at the time of withdrawal from session one, that he intends to return for the third session, an R2T4 is not required.

So, they do collect the confirmation at the time of withdrawal from session one. As long as the student returns for the third session and completes it, no R2T4 is required. If a student does not return for the third session, an R2T4 is done using the same information as on the screen. You use the days in the combined summer term.

What if a student returns for session three and then withdraws after a week? In this case, an R2T4 is done using the withdrawal date from session three and the same 103-day period of enrollment.

Here is the calendar for Business Times University. We'll use it for the remaining modular examples. The school is on a semester calendar with a 15-week semester. Many courses span the entire the 15 weeks, September 6 to December 17. The academic year is 30 weeks and 103 days.

But shorter courses are also offered. BTU calls them parts of the term. Each part lasts for 33 days and students may take courses in any part or combination of parts. The dates of the parts of the term are on this slide.

Now, we have our first example. The student is enrolled for six credits in the full semester. So, we're talking about the full term as opposed to parts of the term. When we talk about the full term, we'll refer to it as full. And when we talk about the parts, we'll refer to it as part one, two, or three.

And so, once again, this student is enrolled for six credits in the full semester. So he scheduled to attend schools from September 6 to December 17. He is not enrolled in part one, but he is enrolled in three credits in part two; and part three, he's also enrolled in three credits, and you can see that on the screen.

The student begins attendance on September 6 for six credits in the full term. On September 28, he withdraws from one full term course of three credits. He is still attending the other full term course for three credits. And so, his enrollment period is still through December 17.

On October 11, he begins his course in part two, and he completes it on November 12. But also on November 12, the student withdraws from his remaining three credits in the full term and withdraws from three credit class in part three. Think about Pell for a moment. The student never attended his three-credit course in part three. So you must recalculate and return any Pell that was paid for that course. This makes his Pell three quarter time.

When does his enrollment end? November 12. He has one completed course and an official withdrawal. He was enrolled to attend through December 17. So an R2T4 is required. He did not attend all the days for which he was enrolled. The withdrawal date is November 12.

And if we count days on the calendar, that is 68 days in school. His enrollment period is 103 days, so we have 68 over 103, and you can see that that equals 0.6602, or 66% of the term. An important point here is the

Department has said that if a student completes a course and withdraws or drops on the same date, we are considering the student to be a withdrawal.

Let's look at another BTU example. Our student is enrolled for six credits in the full term, September 6 to December 17. She is also enrolled in a three-credit course in part one and a three-credit course in part two, and she is not enrolled in part three. I think I got that right.

She begins her class on September 6 as scheduled, two courses in the full term and one course in part one. On September 22, she withdraws from a three-credit course in the full term. She's attending with an end date of December 17.

On October 8, part one, she winds up completing that course. She's not enrolled in part two, so she was enrolled in part two. She is enrolled in part three and she's still attending a three-credit course in the full term.

On November 15, she begins a course in part three and then withdraws from it on December 7. On December 17, she completes her three-credit course in the full term.

So, her enrollment ends on December 17 with a completed course. She attended all the days for which she was enrolled. She is not a Title IV withdrawal. And no R2T4 is required.

So, we're going to look at another example. Our student in this example is in enrolled in six credits in the full term, and three credits in part one. The student did not enroll in parts two and three. She begins attendance in all three of her courses. Her period of enrollment is the entire term because she's enrolled in courses that span the entire term.

On September 14, she withdraws from both courses in the full term. She is still attending the course in part one, so there is no R2T4. Now, her enrollment period has changed. She has withdrawn from the full term course before module one ends. So the period of enrollments ends with part one on October 8. If she would complete part one, then there would be no R2T4. But she chooses to withdraw from it on September 24.

So let's look at the next slide. Her enrollment ends with the official withdrawal on September 24. Her scheduled end date as of September 24 was the end of part one, October 8. So, the R2T4 looks at the enrollment period of part one, a total of 22 days. From September 6 through September 24 is 19 days. So, we take 19 over 33, and that equals 57.6% attended.

If the student shows two withdrawals from the full term course after part one ended, let's say on October 9, her enrollment period for the R2T4 would be the entire term. It wouldn't matter that she completed the part one course. At the point that she stopped attending the end of part one, she was also enrolled in full term course. She would be a withdrawal for Title IV purposes.

So as long as the student is still enrolled in a course at the time that she withdraws from another, and that course goes beyond it, then no total R2T4 is required. And if she withdraws from the only class remaining, then she is an R2T4. And we'll look at some questions later that will help us go through that.

In this term base example, let's look at two different students -- Greg and Dave, roommates; both enrolled for six credits in part one and six credits in part two. Because they are not enrolled in any full term course, they are not enrolled in part three - and they are not enrolled three, excuse me.

The period of enrollment is from September 6 to November 12. Greg and Dave both begin attendance in their part one courses. Greg decides at midterms that he really doesn't want to attend in part two. So he withdraws from the six credits in part two on October 1. Dave isn't really too excited about the part two courses either, but he wants to think about them for awhile.

Because Greg withdrew from the part two courses while still attending part one, his period of enrollment is now revised to end on October 8. Greg completes both of his part one courses and has attended through October 8. No R2T4 is required. Because he did not attend part two, you must recalculate and return any Pell paid for those six credits.

Dave also completes his courses in part one, but he waits until the first day of part two to visit the registrar and withdraw from the part two courses. That means that he withdraws on October 11. He never attended either of the courses in part two. Dave is a Title IV withdrawal.

We must do an R2T4 for Dave at this point that he stopped attending October 8. He was still enrolled for courses in part two. So his period of enrollment until November 12, and he did complete that period of enrollment for those days.

Withdrawing on October 11, that is 36 days of enrollment from September 6. His enrollment period is 68 days until November 12. Should we take 36 over 68 and that equals 52.9%. BTU will have to return some of days Title IV. He may then owe BTU for his period of enrollment.

Notice the difference. Greg withdraws before he stops attending and his enrollment period is revised, no R2T4. Dave waits until after he stops

attending to withdraw, and we must do an R2T4 and some of Dave's aid will be returned.

Here is a non-term credit hour example of modules. The program is one academic year, 30 weeks, 206 days. It consists of six consecutive modules, each lasting 22 days - I'm sorry, 33 days. Students enrolled for the entire program upfront, the slide shows you the dates.

One student begins attendance on September 6 and continues in school until November 4. So he is in the second module. He withdraws from module two and three. On that same day, he confirmed his intention to attend in module four. He will be out of school for more than 45 days from the end of module two. Remember we said that in non-term and non-standard term scenarios, the student must return within 45 calendar days from the end of the module that the student stopped attending.

So even though he said he's returning, because this is non-term, he must be treated as a Title IV withdrawal. We would do an R2T4 showing attendance of 60 days out of 206 total days, and so that is 29.1% of that period.

And here is a non-term credit hour example modules. The program is one academic year, 30 weeks, 206 days. It consists of six consecutive modules each lasting 33 days. Students enroll for the entire program upfront. And this slide shows you the dates.

So, let's look at one more example in the non-term world. This student begins attendance on September 6 and continues in school until October 29. He has started module two. On that same day, he provides written confirmation that he will be back from module three on November 15. This is less than 45 days.

So we do not have to process an R2T4. The student does not return - oh excuse me, the student does return on November 15 and begins module three.

He continues in school only until January 12, which is during module four. He doesn't confirm that he will back for modules five and six, and so his pre-registration for modules five and six are not sufficient for delay on R2T4. So we must do an R2T4 calculation because he withdrew during module four.

The withdrawal date is January 12. Let's count the days. He attended from September 6 until October 29, so that 54 days. Because if his first withdrawal, he is not scheduled to attend between October 30 and November 15. So he attends 43 days between November 15 and January 12, and so that's a total of 97 days with a period of enrollment that was 206 days. And so, we have 97 over 206, and that will give us 48.1%.

And these are the questions that you have most likely seen before that I mentioned a little earlier. So, to determine if the student in a program with modules has withdrawn, we ask the three questions that you see on the screen.

So let's review them. One is did the student cease to attend before completing, or failed to begin attendance in a course schedule to attend? And if it's yes, then we would go to question two. And if no, the student is not a withdrawal.

If we need to go to question two, then that is when cease to attend or fail to begin attendance in a schedule course, was the student attending other courses? If yes, then the student is not a withdrawal. And if no, we will go to question three.

And question three asks, did the student confirm attendance in a later module in the payment or enrollment period, and, of course, the 45-day rule applies is,

of course, it's applicable. And so, if the answer is no, the student is withdrawal. And if not a withdrawal, then the Pell recalculation may apply.

Remember, the student who never began attendance in any course during the period of enrollment is not an eligible student. The student is not a withdrawal because they never started. No R2T4 is done, and the school must return all aid disbursed and notify the Direct Loan servicer that any loan funds that the student received as a credit balance.

Though I wish all of our participants today will be R2T4 experts, I understand that calculating proper Title IV returns takes dedicated effort, time, and experience. And no matter how much we think we know, there's always something new to learn. And that's why it's so important that you take the time to become familiar with the Department's guides, manuals, Web sites, regulations and policy letters as they relate R2T4, as well as other key Title IV topics.

Remember that the Department's reference materials in Title IV resources are available to all interested parties that assist with day to day operations surrounding the administration of Title IV programs. It's not always what you know, but where you could find it.

And so, we just want to show you a few additional resources to keep in mind when you're working through R2T4 calculations on campus. The Dear Colleague Letter GEN-11-14 that has an enclosure, and again, that was published on July 20th of 2011, it contains a series of Qs and As regarding the most current provisions of R2T4 in Program Integrity Regulation that was published on October 29th of 2010.

The last two Dear Colleague Letters are still valuable resources of general information about the calculation, but our prior to HERA and the new worksheets. So you want to keep that in mind. And of course, the FAFSA Demo Site provides access to FAA Access to CPS Online, and therefore, to the R2T4 demo. Remember that the username is eddemo and the password is fafsatest, and those are provided on that demo Web site.

And this concludes our formal presentation on R2T4 and modules, and we hope provided valuable insight into your processes and responsibilities that are associated with returning Title IV funds where modules are present. And as a reminder, please don't forget to attend our other 2012 Fall Webinar Training Modules.

And now, I'll turn this back over to Suzanne. Suzanne?

Suzanne Schedlt: Thank you, Natasha and Sandy, for that excellent presentation. We do have a few minutes to go over a few of the questions that were asked. We do have our question managers still answering some of the questions. So I'm just going to go over a few of them.

We had a question regarding modules that if a student enrolls in the first class - there's module, there's two modules. Student enrolls in a first class in module and then drops module two but remains in module one. Is R2T4 required, or just a change in enrollment? And the answer is as (posted), if the student drops the second module before the end of the first module and then completes the first module, there is no return of Title IV funds.

Another questions was if we have two eight-week sessions within a 16-week semester and also a full 16-week semester, then is that considered a standard term? And the answer is a 16-week semester that is composed of two eight-

week modules can be considered a standard term as can a 16-week semester that does not have any modules.

Another question, when the student completes module one and obtains a B grade and halfway into module two indicates he wants to withdraw and R2T4 is performed, what happens with the grade in module one? Does it get changed to a W? And the answer is that this is an institutional academic decision and not regulated by FSA.

Another question, are schools required to still have to fill out an R2T4 calculation sheet if a student has withdrawn past the 60th percent date? And the answer would be that this is still an excellent way to document that the student is past the 60th percent point. And that then you have that in the student's file.

So those are some of the general questions that we would like to have answered or that we wanted to give out to you. Are there any of my colleagues that have anything to add before we close out this session?

If not, then I'd like to thank everyone for participating today. I'd also like to draw your attention that we will be having an evaluation that you can put. We would like you to do that as soon as possible, leave it as up on the screen now. We really do value your input. It helps us to provide and plan for future training sessions.

So, again, please do complete the evaluation, and we'd like to thank you for joining us today. Operator? Hello?

END