

## Issue Paper 5

### Program Integrity and Improvement Issues

**Issue:** Retaking Coursework

**Statutory cite:** None

**Regulatory cite:** §668.2

**Summary of issue:** Determining whether the regulations on retaking coursework should be amended to limit applicability only to undergraduate programs of study and whether the single repetition of previously passed coursework should include all passed coursework if the student's program requires repetition of all coursework to academically progress toward program completion.

The October 29, 2010, final regulations (75 FR 66832) amended the definition of "full-time student" in §668.2 to allow repeated coursework to count towards a student's enrollment status in term-based programs, limited to one repetition of a previously passed course or any repetition of previously passed coursework taken due to a student's failure of other coursework. The Department considers a "passed course" and "passed coursework" to be any course with a grade higher than an "F," regardless of any institutional or program policy requiring a higher qualitative grade or measure to have been considered to pass the course. Subsequent to publication of the final regulations, institutions with medical, dental, and other similar graduate or professional programs contacted the Department to clarify whether the regulatory change applied to programs above the undergraduate level. These institutions noted that the application of the change to these health profession programs would be problematic because the interconnectedness of the coursework required students who failed one course to repeat the entire term's coursework to academically progress in the program. They also pointed out that students in these programs were only eligible for unsubsidized loans and that denial of title IV aid to these students to repeat all coursework would result in students either relying on less desirable private education loans or withdrawing from these programs. The Department has issued guidance indicating that the change to the regulations does not apply to graduate or professional programs, but this is not specifically stated in the regulations.

#### Comments and questions:

- The current program regulations governing repeated coursework do not explicitly exclude graduate or professional programs from the requirement. Should the regulations be amended to exempt certain graduate or professional programs, or provide a different treatment for such programs?
- Regardless of academic level, should the regulations recognize certain programs that, due to the nature of the curriculum and academic progress standards, require students with one failed course to repeat the entire term's coursework to progress academically in the program?