**Department of Education,**

**Office of Postsecondary Education**

**Webinar**

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WEBVTT

Good morning or afternoon everyone. Welcome to the first of three webinars presented by the Office of Postsecondary Education. These webinars will provide an overview of the changes to the regulatory requirements in the distance education and innovation regulations which were published on September 2, 2020 and will be effective July 1, 2021, unless early implemented by institutions. These webinars will provide detailed information about changes to the regulations, including in the distance education and innovation final rules. Each webinar will address a separate set of topics from the regulations.

Today's webinar will address satisfactory academic progress and return of Title IV funds. These training materials and recording of the session will be provided shortly. We will notify the community once they are available.

Today's training will be in listen only mode. You will be able to ask questions through the live event question and answer feature by clicking on the Q& A session button at the top right of the webinar screen. We will conclude today's webinar with the Q and A session as time permits. Today's webinar will be presented by Aaron Washington of the Office of Postsecondary Education and David Bartnicki of Federal Student Aid. I will now turn it over to Aaron Washington. Thank you.

To start, I'll just go through the agenda with everyone. We're going to start with a brief, high-level introduction of how we got to these new regulations. I'll cover satisfactory academic progress and then turn it over to my colleague David Bartnicki to cover the return of Title IV aid. Afterwards, we'll look at some references and some contact information and where you can send questions. Again, as time permits, we will have a question and answer session that will be facilitated by our training officers. We'll also be joined by David Musser and Gregory Martin to help facilitate some of those questions as well.

The Department began negotiations to amend and revise regulations related to satisfactory academic progress and return a Title IV aid all the way back in 2018, and while the rule was titled Distance Education and Innovation, we revised several regulations separate or unrelated to distance education, including SAP and R2T4. We published an NPR M on April 2nd, and as with all our rules, were required to have a comment period for the public to express opinions and offer alternative language. The final rule was published September 2nd and any role published by November 1st is effective the July 1st of the following year. Our effective date for the rules we will discuss today is July 1, 2021. However, you can all implement the SAP/R2T4 for regulations early even today. I think you'll hear that throughout the presentation that these are early, implementable regulations so let's move into SAP.

The law requires that a student make satisfactory academic progress to maintain eligibility for Federal student aid so each of your institutions should already have a reasonable set policy for monitoring that progress except the policy is reasonable if it meets both the qualitative and quantitative criteria. Your policy must specify the quantitative standard which is space that the students must progress through their program to ensure that they'll graduate within the maximum time frame.

Currently you all calculate the space by dividing the total number of hours the student has successfully completed by the total number of hours the student has attempted. For the purposes of this presentation we will mainly focus on the new regulations for SAP measurement, which is measuring a student space in calendar time. Your policy must specify a qualitative standard as well, which is usually a grade point average or equivalent that it must have at each evaluation. Our updates to SAP made by the new regulations solely regard the quantitative evaluation and there are only two updates we use for this type of chart throughout the presentation to show the changes from the current regulation to the new regulation.

The first change is that an SAP review is currently required for abroad programs space. Review is currently required for all programs starting July 1st or if your institution has already implemented this provision a space review is no longer required for subscription-based programs, non-term programs and clock-hour programs. The second change is that currently max time frame for credit-hour programs can only be calculated or measured in credit hours and remember that's done by dividing the total number of hours the student successfully completed by the total number of hours they attempted.

Our new regulations allow the max time frame for credit hour programs to be calculated or measured in calendar time or credit hours. Your choice using calendar time may make more sense for certain programs, especially those where coursework on enrollment status is prescribed. However, you can maintain your current policy. There's no requirement to change to the new regulations. In the next few slides, we highlight why the Department exempted certain programs from the space review. There will be an in-depth webinar on subscription-based programs on May 10th, but as a brief overview.

Subscription-based programs charge students for a term and the student must complete a specified number of credit hours. A student cannot receive subsequent disbursement of Federal student aid until the credit hour or equivalent in the prior payment periods are complete. The Department determined that this obviates the need for an Institution’s SAP policy to specify space for a student in a subscription-based program because the student cannot continue to receive Federal student aid without progressing. Similar concept rings true for non-term credit-hour programs and clock-hour programs. Prior to receiving a subsequent disbursement, a student must successfully complete half of the hours and weeks in an academic year obviating the need for spacing valuation. In these types of programs, max-time frame after exceeding max-time frame, a student is no longer eligible for Federal student aid. To determine max-time frame for undergraduate program in calendar time, you multiply the published length of the program by 150%. The flexibility extends to graduate programs.

However, max-time frame for graduate programs is a period the school defines and is based on the length of the program. The question is, can a school switch back and forth between calendar-time and credit-hour space, and the evaluations in the same program? The answer is no, you must set measurements for all students in the same program and very important.

I probably say that a lot throughout the presentation. This is very important to know, but it is important to know that calendar-time does not account for individual student enrollment status changes. The credit-hour space completion does, but the calendar-time does not last. The thing to know on this slide is just emphasizing that while we no longer require a space review for non-term programs, the max-time frame still exists for all programs. Continuing with max-time frame your school must have a policy for addressing how not attending a payment period or multiple payment periods impact the max-time frame.

Let's say your school’s policy is to not alter the max-time frame, the students required hours for program completion. Completion will then need to be adjusted if your school’s policy could be to exclude none attended payment periods which would not require any adjustments to required hours. We'll see examples of all these things. I think hopefully all this will become clear to you when we get to the examples. You must also have a transfer policy which outlines a reasonable approach to address how transfer hours impact app and max time frame. For example, your school could have a policy that 12 semester credits transferred in equal one payment period and this scenario. If a student in a 2-year program with the max time frame of three years transferring 12 credits to your institution would reduce the max time frame by one payment period and determine the structure of the remaining number of credits required at each valuation point.

Based on 2 1/2 years to complete versus three years and again, we'll see an example of this as well. To review, currently many schools that offer credit-hour programs divide the cumulative number of hours a student successfully completed by the cumulative number of hours the student has attempted. The new regulations allow you to express SAP space in calendar time by determining the number of hours that the student should have completed at each evaluation point. If you're using calendar time, your school determines the number of hours to complete each payment period based on the published length of the program and this is part of your schools on policy. In all of the upcoming examples, every single one of them, the Department has reasonably determined the number of required hours for each evaluation point, but your schools policy relating to the reasonable number of hours required could differ from what Department shows.

In our examples, and this could differ because you might have different term structures or different coursework requirements or different other program requirements that we haven't accounted for. These are just examples in your schools that could have different reasonable number of hours required per your policy. Let's dive into some examples. Here you can see we have a straight-forward example of a four-year program. We've multiplied the four years which is the published limited length of the program times 150% that results in the student having six years to complete a four-year program to maintain Federal student aid eligibility. For example, we've broken out the least amount of credits that the student would need to achieve at the end of each award year. If your institution has four credit hour programs, you're not required to break out the credits. I've seen on the slide that your institution can elect to have its own policy on the least amount of credits per award year that fall within the maximum time frame.

Here's another example of measuring max time frame and calendar time by payment period. So instead of the year, we're going by the payment period and in this example, we have a two-year program. We've multiplied the two-year, published the length of the program times 150% and the student has three years to complete his program and maintain that pace with this method. With this method, that student has the benefit of being placed on a warning. I mean he is not maintaining SAP; a warning is a status I want to go to school assigned to a student who is failing to make satisfactory academic progress. The school reinstates eligibility for a one payment period, and they may do so without the student having to go through an appeal.

In this example, the program also has optional summers for national summer. There is no minimum number of hours required to be completed. So here we have the same example from the previous slide except that this time the summers are not optional. The program still has a max time frame of three years, but because the summer is required the school has assigned a smaller minimum number of credits. A student would need to complete each payment period to help with the visual we've also shown on the slide that each award year consists of three mandatory payment periods. And notice that the student completes the same number of minimum hours at the end of each award year. As the previous slide, this is a four-year program that is a stand-alone part-time version of a two-year program.

This is not an example of a student enrolled in a part-time program, calendar time, pace evaluation does not account for individual student enrollment status changes like the credit hour measurement does. I'll also continue to reiterate that your school can determine minimum number of hours per year to complete based on coursework. Perhaps your school would develop a different configuration of minimum number of credits per year within the six-year max time frame that differ based on the structure of the program, the coursework, or other program requirements. Remember that school must develop a reasonable policy to account for the number of hours that transfer into calendar time.

The Department will not prescribe a policy and this example of a student transfers into your institution with 24 credit hours towards 120 credit hour program leaving 96 remaining hours to complete the school's policy is that 12 semester credits equals one payment period. Your school could have a policy that reasonably determines a different number of credits that equates to a payment period, but in this scenario the student can transfer one full award year worth of credits into the new program.

The next school determines the max time frame for the new program, which is 6 years. In our example of a program, the school, then subtracts the one year from max time frame because it determined that the student transferred in one-year credit hours. In several of our examples, we've been able to evenly divide remaining credits by the remaining years. However, this example would yield fractions so unless you're awarding fractions of credits required credits must be in whole numbers. If a student stops attending for an academic year and subsequently re-enrolls per your policy, you can take their approach on this slide or a different approach on the next slide. You will note on this slide that each approach maintains a 6-year maximum timeframe.

In this example, the student leaves for at least two semesters and the student decides to not extend the max time frame in the school. So, the student here must make up the credit hours from not attending the second year to keep that pace and the minimum hours would have to be adjusted to account for the student’s new pace requirement. The school chose for its SAP policy, a different approach in which the second year was excluded from the max time frame and the students required hours were not altered by his absence. Everything discussed in this section provides additional SAP flexibility, so your school does not have to adopt these options that these policies serve as a Federal minimum and your policies could be more restrictive so everything that we've discussed is optional.

Well SAP is not optional, but yeah, using calendar time is optional to measure SAP pace.

Finally, the CARES Act provided additional flexibilities to institutions regarding the calculation of SAP. As a result of COVID, to exclude from the quantitative component of the SAP calculation, any attempted credits that were not completed by the student without requiring an appeal. We provided an example on how to calculate set pace when attempted credits are not completed due to COVID.

In the May 15th electronic announcement and now I'll turn it over to David Bartnicki to discuss the return of Title IV aid. Thank you, Aaron for that great summary of our new SAP regulations. As mentioned, my name is David Bartnicki, Program Specialist with Policy Implementation and Oversight and I drew the short straw. I mean, I was given the honor to talk about R2T4 today or what we affectionately call return of Title IV funds as under the law and under Regulations 668.22. If a Title IV recipient who started attendance within a payment period or period of enrollment completely withdraws from that institution. The institution must perform an R2T4 calculation to determine how much of the Title IV funds a student has earned and what, if any, may have to be returned to the Department. If a student earns more than 60% within a payment period or period of enrollment, the student has earned 100% of Title IV aid.

What we're going to discuss today are some new regulations, some new options, some new flexibilities. Within 668.22 and as Aaron mentioned, these new regulations become effective July 1, 2021, or earlier. If your school chose to implement the R2T4 regulations early, it is perfectly fine. Note that the new regulations will apply to students who withdraw or otherwise cease attendance and that includes graduates from a program and that's because one of our exemptions focuses on graduates. If they would draw or otherwise cease attendants on or after July 1st, 2021. I stress this because these new regulation time frames are not based on when the student’s payment period starts or ends, but instead focuses on the timing of when the student withdraws or ceases attendance. Please keep that in mind.

Now we had various areas within our regulations that we have enhanced, updated, modified. One of them was the order of return when a student withdraws. As you can note on this slide, we have moved the Iraq and Afghanistan service grant up into the number 5 slot within the Order of return now ahead of FSEOG and teach grants. As you can see on this slide, our current regulations have a different order. In fact, the new regulations remove outdated Title IV programs that are no longer in effect. You can see Perkins, ACG and smart have been removed from our order of return. We also updated or modified various definitions under 668.22. One of those was the approved leave of absence or LOA. This specific definition or part of the definition expanded the LOA requirements to subscription-based programs. As Aaron mentioned, the subscription-based programs are a new defined program that we discuss in various regulations throughout the September 2nd Federal Register Notice, but it's also mentioned here a couple of times within our return of Title IV rules.

We specifically state that clock-hour non-term credit and now subscription-based programs do not have to permit the student to complete coursework the student began prior to the leave of absence so you can see in our little chart under the current regulations that we don't address subscription-based programs. However, now we will under our new regulations. We also enhanced the definition of academic attendance and attendance at an academically related activity, specifically under our definition within 668.22. For academic attendants. We further clarified and enhanced it by adding in the reference to our new academic engagement definition, which we can find under 34 CFR 600.2.

If we look at the new academic engagement definition, which enhances our definition as it relates to academic attendance, you can see a variety of enhanced phrasing and areas directly related to academic attendance. Specifically, we're talking about active participation by a student in an instructional activity. We talk about attending synchronous classes, lecture recitation field or laboratory activity, physically or online. Where there is an opportunity for interaction between the instructors and students, we mention assessments, interactive tutorials, webinars, group projects, etc. We really tried to enhance the area of academic engagement and what can constitute attendance or attendance at an academically related activity. Now I do want to point out at the bottom of the right-hand side of this chart you notice in the definition of academic engagement we still have the list of items that are not considered academic attendance or academic engagement. You can see one of those key items is still simply logging into an online class or tutorial without any further participation is still not considered to be attendance.

I bring that to your attention because that's important for all our schools out there that are working with and developing online coursework. We also modified the definition of modules. We now state in our new regulations that a program is offered in modules if the program uses a standard-term or non-standard term, academic calendar not subscription-based and the courses in that particular program do not span the entire length of the payment period or period of enrollment. Why is this important? Well, if you look at the chart on this slide, you'll note that our current regulations don't define p programs with modules by certain types of programs. In effect, any program could potentially be considered a program with modules, as noted under our new regulations, effective July 1, 2021, we specifically define these programs with modules as standard term or non-standard term programs that are not subscription based. This becomes important when we're trying to apply certain regulations specifically for programs with modules.

Now we also talk about our new regulations some modifications to the consideration as to when a student is withdrawn, and we do so by the different types of academic programs or academic- calendars. Specifically, we state for a student in a standard or non-standard term program again excluding subscription based. A student is considered withdrawn if the student ceases attendance and is not scheduled to begin another course in that payment period or period of enrollment for more than 45-calendar days. After the end of the module they ceased attending again. We're talking about standard or non-standard term programs for subscription-based and non-term programs. We consider a student withdrawn if they're unable to resume attendance within their payment period or period of enrollment for more than 60 days after ceasing attendance and all these days, we're referring to are calendar days.

You can see here again in our chart comparing current regulations to new regulations. Note that currently we do not have time frames associated with when a future module starts within a standard term, so we've added a timeframe threshold for our standard terms. You can also see that for our non-term programs we modified the threshold time frame from 45-calendar days to 60-calendar days. Of course, we have added subscription-based program as well. We also have specifically outlined when a student can provide written confirmation which can suspend the potential need for a withdrawal calculation. In certain circumstances, a student is not considered to have withdrawn if the institution obtains written confirmation from the student at the time of withdrawal that he or she will attend a later module within that same payment period or period of enrollment.

This is not new. However, what is new and has been modified are again those time frames, those thresholds of when that future module must start. For standard and non-standard term programs that are not subscription-based, that future module must begin no later than 45-calendar days after the end of the module. The student ceased attending for our subscription-based programs. This written confirmation being provided at the time they withdraw must indicate that they're going to resume attendance within the same payment period or period of enrollment, and that's key for subscription-based programs and is no later than 60-calendar days after the students ceased attendance. For our non-term programs when the student provides written confirmation at the time there withdrawing, they must be able to resume attendance no later than 60-calendar days after they cease attendance.

Again, as we currently have in our current regulations, but being modified based upon the different time frames. Under our new regulations, a student can still change the date of their return and begin a later module within that same payment period or period of enrollment if before they were supposed to return. They provide this change in writing and that this later module that they've changed their attendance still meets the timeframes outlined. In our regulations for standard and non-standard-term programs, not subscription-based that later module can be no later than 45-calendar days after the module that the students ceased attending an for non-term and subscription-based they must be able to resume attendance no later than 60-calendar days after they ceased attendance.

You can see here again on the chart some of the changes between our current regulations and new regulations. Seeing how standard-term programs now have some time frame thresholds in place, the modification for non-term from 45 to 60 calendar days and of course now specifically addressing subscription-based programs. As Aaron mentioned and will continue to mention, we are going to have a future webinar. I believe May 10th that will address specific issues around subscription-based programs.

Now let's talk a little bit about withdrawal exemptions. This has been a very key topic within our new regulations that have garnered some among institutions in question being raised. We want to make sure that we walk through this area carefully with our schools in today's webinar. One exemption which talks about student’s that graduate from a program for completing all the hours or days in their scheduled period, applies to all programs. I want to stress that if you have a student who completes all the requirements for graduation from his or her program before they actually complete the days or hours in the period that they were scheduled to complete. That student is not considered a withdrawn student, no R2T4 would have to be performed for that student. This graduation exemption again applies to all programs regardless of whether it has modules or not. I stress that because some of the exemptions we're going to talk about do focus on programs with modules so just keep that in mind.

Now when we're talking about withdrawal exemptions for programs with modules there's are a couple of areas to discuss in a program offered in modules. A student is not considered to have withdrawn if they successfully complete one module then includes 49% or more of the number of days in the payment period. When we're looking at the overall number of days in the payment period you do exclude scheduled breaks of five or more consecutive days and all the days between modules. Now when we're talking about this 49%, please note that the 49% may not be rounded up, so if it comes out to be 48.7% it is below 49%, the student does not meet this withdrawal exemption. Also, the 49% that we're talking about is based on the number of days in the overall payment period, not 49% of only the modules the student was enrolled in.

Remember I mentioned successfully completes for a successful completion means that the student has earned a passing grade within that module. An earned F is not a passing grade. Another withdrawal exemption still tied to the number of days in modules is a student would not be considered withdrawn if they successfully complete a combination of modules that when combined contain the 49% or more of the number of days in the payment period, excluding the requisite number of days you can exclude. Again that 49% can't be rounded up, it's still based on the overall number of days in the payment period. A successful completion means earning a passing grade and finale last withdrawal exemption for programs with modules is when a student successfully completes the course work equal to or greater than the course work required for the institution’s definition of 1/2 time student.

Again, when we stay successful completion, we mean that the student has earned passing grades in enough credits to qualify for halftime. Half-time enrollment is at least half the workload of the applicable minimum requirements outlined in the definition of a full-time student. Here you can see in our comparison chart between current regulations and new regulations. This is adding benefits to our students in schools when working within the R2T4 calculation, because currently there are no areas. These additional withdrawal exemption considerations are new within our rules and so to help better understand some of what we just talked about, let's go over a few examples.

One of the things to remember and what we try to do when we introduced students within programs with modules and the issue of whether they were withdrawn. We developed a series of questions to help our institutions determine whether a student had withdrawn when enrolled in modules. For this presentation we have expanded those questions to assist our schools to address some of these new areas in our new regulations. Instead of three questions we now have five questions that we potentially would ask ourselves to see if a student has withdrawn. Did the students cease to attend or failed to begin attendance in the scheduled course that was included in the calculation of the students Title IV awards? If the answer is yes, we go to question 2. When the student ceased to attend or failed to begin attendance, were they attending other courses in the same period? If the answer is no, we go to question 3. When the student sees to attend or failed to begin attendance, did the student complete all the requirements for graduation?

There you can see us focusing on one of the new exemption criteria. If the answer is no, we go to question 4. When the student ceased to attend or failed to begin attendance, did they successfully complete modules or combination of modules that contain 49% or more of the number of days in the payment period or did they successfully complete coursework equal to half time student enrollment status? If the answer is no, we go to the last question 5. Did the student confirm attendance in a later module, talking about that written confirmation process? We talked about the course here focusing on the new time frame thresholds, 45 days for standard or nonstandard, 60 days for non-term or subscription based. If the answer is no and if there is no written confirmation, then the student is a withdrawn student for Title IV purposes.

We have a couple of examples within our withdrawal exemption criteria. A student who completes all the requirements for graduation prior to completing all the course they were scheduled to attend this exemption can impact any program. Remember, it doesn't have to be one that's defined with modules we chose to have clock-hour examples. This student enrolled in a 900-clock-hour program with two 450-hour payment periods partway through the 2nd 450 payment period. Within that payment period, the student completed all the academic requirements to graduate and when they graduated the program, they only completed a total of 750 hours in the program. Looking at our new withdrawal exemption criteria, even though they have not completed all the hours in the payment period. Since the student has graduated the student is not considered withdrawn for R2T4 purposes.

One thing to keep in mind when we talk about this is our withdrawal exemption around students that graduate without completing all the hours or days in their program for clock-hour programs. We want to stress policy that states that if a student graduates without successfully completing all the hours in the clock-hour program. The school must repro rate the amount of Title IV and only pay the student for the hours successfully completed. Again, I need to stress that this requirement is only for clock-hour programs. In our example, if the student left after 300 hours in the second payment period, the school would have to prorate all Title IV that includes direct loans and only pay the student for a total of 750 hours instead of paying them for 900.

This is unique to clock-hour programs, in part because of how clock-hours are defined. Remember that clock-hours are a specific unit of time and the Title IV that is provided to our students are based in part on how the student progresses those actual units of time and they have to actually successfully complete those hours to progress throughout the program. Now I do want to point out at the bottom of this slide that graduating early from any program without completing all the days or hours should not be a common occurrence. If we do see a significant number of your students continually graduating early, compliance could call into question. What is the true length of your program for Title IV purposes? Please be careful this could become program eligibility issue if most of your students are not going the full length of your program. A couple of other examples to look at when we talk about these new exemptions. What about a situation where we have one module that includes 49% or more of the days in the payment period? Here we have an example of a student that enrolls in nine credit hours of semester long course work in three hours in Module 1 the overall semester. For our purposes of determining withdrawal exemption as 105 days.

Remember, the school would have backed out and he's scheduled breaks of five or more days and all days between modules. One consists of 52 days the student earns a” B” in Module 1 and then withdraws after completing Module 1 from the entire semester. The question the school asked is R2 T4 required. We take the number of days in the module 52 that the student was enrolled in divided by 105, which is the overall days in the payment period and that equals 49.5%. In this case, since the student successfully completed a module that includes 49% or more of the number of days in the overall payment period. R2T4 is not required. Let's look at another example at the bottom of the slide. Student enrolls again in nine hours that are semester long course work, three hours in module 1.

Again, the overall semester for this exemption formula is 105 days, but in this case Module 1 is only 51 days. A lot of you have modules of a lot of varying lengths so we have to be careful to know how many days actually exist within our different modules the student earns a ”B” in Module 1 and then completely withdraws from. The entire semester is R2T4 required. Well, in this case 51/100 48.5%. Now the student in this case did not successfully complete a module. Yeah, they got a “B”, but they didn't successfully complete a module that includes 49% or more of the number of days in the overall payment period for those paying attention. What I mentioned earlier that 49% you cannot round up too, so because it was below that 48.5 that is below 49% and therefore R2T4 is required. The student would not meet the withdrawal exemption.

In this case, we have another example of a student enrolled in nine hours of semester long course work. Three hours in Module 1 again the overall semester days is calculated for this exemption is 105 days, with Module 1 being 52 days. Now they complete Module 1, but they do so after earning a hard-earned F, so they have earned an F at the end of Module 1 and then the student completely withdraws. Is R2T4 required the number of days? 52/105 is equal to or greater than 49%. However, remember in this case, the student did not successfully complete a module they did not earn a passing grade in there for the exemption would not apply in R2T4 is required.

Here we're going to look at some examples around combination of modules. A student enrolls in four modules taking 3 credits in modules one and three and two credits in modules two and four. I do want to note I had to when we were trying to address this. We were trying to make sure that we were looking at different scenarios. As many as we could within the time frame that we had to try to showcase some of the different situations that could arise. The overall term in this case consists of 80 days minus the days that is school can back out and each module consists of 20 days.

The student earns a” D” and a “C” in Module 2 and then completely withdraws from the entire term. Is R2T4 required? If we look at the modules that the student has successfully completed, we look at 40, 80 = 50% since the student did successfully complete. Remember, we did have passing grades in both modules one and two. The combination of modules includes days that are 49% or more of the overall number of days in the overall payment period; therefore, R2T4 is not required.

The next example is a student enrolls in five modules taking 3 credits in modules one and three and two credits in modules 2, four and five. In this case, the overall term as defined by the school subtracting out the requisite number of days is 100 days. All the modules or 20 days long the student earned to be in Module 1 for three credits a” C” in Module 2 for two credits and then the student completely withdrew from the entire term. Is R2T4 required? Well, if we look at the number of days in the modules, the student successfully completed, we have 40/100 which is 40%. The student did not successfully complete a combination of modules that include at least 49% or more. We also must remember, nor did they complete halftime coursework. I must bring that up because, remember they only completed five hours between modules one and two.

Therefore, they don't meet any of the withdrawal exemptions and therefore R2T4 is required. A student enrolls in three modules taking 6 credits in Module 1 and three credits in Module 2 and three credits in Module 3. The overall term for the withdrawal exemption calculation is 100 days minus the requisite number of days they can back out. Module 1 is 40 days; Module 2 is 25 days and Module 3 is 35 days. We have this example in part because a lot of your modules may have different lengths of time, and that's perfectly fine. You just have to be careful to properly calculate the number of days the student earns a ”C” and an F in Module 1 and they also earn another F in Module 2, the student then withdraws from the entire term after Module 2 is R2T4 required. This student did not successfully complete a combination of modules that are 49% or more. The student did not successfully complete Module 2 because he got an earned F. Therefore, we can only look at the days in Module 1 which is 40 days 40/100 is 40%. That's less than 49%. Also remember they did not complete halftime coursework, they only completed one course in Module 1 with a passing grade for three credits. Therefore, R2T4 is required.

Finally, looking at halftime completion examples, a student enrolls in six credit hours of semester long course work and six credit hours in Module 1. The overall semester for the exemption formula is 105 days minus the requisite number of days and Module 1 consists of 45 days. The student earns a “B” and an “A” in Module 1, then completely withdraws. Is R2T4 required? Even though the number of days completed in Module 1 is below 49 percent, 45 days out of 105 is only 42%. The student did successfully complete halftime coursework in Module 1. They did successfully complete 6 x hours. Therefore, they meet the halftime withdrawal exemption and R2T4 is not required.

The example below has a similar situation except in that situation the overall payment period of 105 days in the module is 45 days. Note that the student earned a” B” and earned a F in Module 1 then completely withdraws. In this case, not only did they not successfully complete a module that includes 49% or more of the number of days that's was only 42%, 45/105. They also did not successfully complete halftime coursework. They only earned a passing grade in one course for three hours. Therefore, in this case, R2T4 is required.

Our final examples focus on a student enrolled in five modules, taking 3 credits in each module. The overall term consists of 100 days for this withdrawal exemption formula backing out the requisite number of days of breaks and days between modules. Each module consists of 20 days and the student earned a “B” in Module 1, they earned an F in Module 2 and they earned a” C” in Module 3. After Module 3 they completely withdrew and R2T4 is required even though the number of days successfully completed in Modules 1, 2 and 3 are the only ones they could factor in. Remember, they earned an F in Module 2 is below 49%. Modules 1,2 and 3 only equate to 40% of the number of days. However, with Modules 1 and 3, they did successfully complete halftime coursework 6 hours and therefore R2T4 is not required. I’m just trying to give a little example of what may happen when they enroll in multiple modules and fail and past some courses, etc.

Finally, a student that enrolls in five modules, three credits in each module, the overall payment period length is 100 days, with each module being 20 days. This student earns a “F” in module “C”, in Module 2 and then withdraws from the entire term. Is R2T4 required since the student did not successfully complete modules with 49% or more of the number of days in the overall payment period. They only completed 20% they were scheduled. To enroll in all 5 modules with three credits in each they also did not successfully complete halftime coursework in modules one and two. They only successfully completed or passed one course in Module 2 for a total of three hours. Therefore, they do not meet any of the exemptions and R2T4 is required. I do want to point out here in this particular example, if the student was only enrolled in Module 1 and Module 2 and they got an F in Module 1 and they got a “C” in Module 2, then of course they stopped attending because their modules were done for that payment period, even though they don't meet any withdrawal exemptions that is not a withdrawal for Title IV.

For purposes, these are simply additional exemptions to consider determining if a student is a withdrawn student. If the student completes all the days they were scheduled to attend, let's say one module, and then they complete that one module and that payment, they are not a withdrawal for title. We did not change that which is currently in existence and will continue to go forward. A couple of reminders and we talk about withdrawal exemptions. Remember that these requirements for withdrawal exemptions when you're trying to meet the 40 number of days or half time completion, etc. are used solely to determine if the student is considered withdrawn. For R2T4 purposes, if a student does not meet these withdrawal exemptions and they are considered withdrawn, you are simply going to follow the normal R2T4 requirements, such as did the student earn more than 60%? Are there post withdrawal disbursements? As soon as you determine that the student is a withdrawn student, you don't factor or focus on the 49%. The 49% is only used to determine the student is exempt or not. If they are not exempt, we then go back to the normal R2T4 rules. I want to focus on and remind schools because some of them are confused with some of the questions were getting. We’re bringing in some of the withdrawal exemption criteria and trying to also use that criteria when doing an actual R2T4 calculation so just separate out those requirements and you'll be fine. Again, as I mentioned at the bottom of the slide if the student does not meet the withdrawal exemptions, but they do complete all the coursework they were scheduled to attend even if they were only scheduled to attend one module, no R2T4 is required since the student was only scheduled to attend those particular days within that payment period.

Our last topic under R2T4 is to focus on defining the number of days scheduled to complete in modules. Our new regulations specifically indicate that a student in a program offered in modules is scheduled to complete the days in a module. If the student’s coursework in that module was used to determine the amount of the student’s eligibility for Title IV aid, we have further define this to indicate that a school will include the days in a module in the denominator of the R2T4 calculation. If the following items can be true, a student attended at least one day in the module. Anytime a student attends at least one day in a module, those days in the module will be factored into the R2T4 calculation specifically in the denominator. When doing the calculations, please keep that in mind? That's overreaching guidance that we need to keep in mind or this if the student did not attend at least one day in a module. Was the module included in the institution’s determination of the student’s title for eligibility? There are two ways to determine if the number of days that the student was scheduled to complete in a module for those where the student did not attend.

So, if I mentioned I attend one day those days in the module will be factored into the calculation. If I don't attend the module, those days would be included in one of two ways. To determine you can choose to use the student’s enrollment schedule based on the module, there enrolled in at a fixed point. This fixed date is optional. Now we must stress that we've gotten that question a few times. It is optional to use a fixed date for our purposes. We're affectionately calling this fixed point an R2T4 freeze day. We're doing that in part to help differentiate it between other dates. We seem to have more and more dates coming up, and so we want to make sure we understand that this R2T4 freeze date is specific to the R2T4 process. If you don't want to use the R2T4 freeze date that's fine, and if you don't you are going to monitor the changes in the student’s enrollment throughout the period, right? There is no freeze date. You were going to monitor that student’s enrollment status throughout the payment period which could go up or down depending upon the student adding or dropping coursework, and it could cause the number of days within the calculation to change. I will tell you now that there's no perfect way to do this.

There's pros and cons for both. Some of the examples you're going to see is going to appear to be more lenient one way and more restrictive. Another example where the reverse is true and what works for your students in your programs? At your school if you choose to use an R2T4 freeze date, which is again optional, subsequent enrollment fluctuations, typically don't alter the number of days. Now I say typically because we must remember what I mentioned earlier. You will always include days in modules in which the student attends at least one day. Just keep that in mind that the R2T4 freeze date can coincide with other dates, census dates, Pell recalculation dates that makes it easy or you can have it as a separate date. Just like power recalculation dates if you want to you can have multiple R2T4 freeze dates covering multiple modules. One thing I want to point out and we mentioned at the bottom of the slide that's very important.

As an institution, you have to ensure that if you choose to use an R2T4 freeze date forgiven payment period or period of enrollment, that you're not going to establish this freeze date to occur prior to a time frame when most of your students enroll for classes. What we mean by that is we don't want the school specifically structuring their freeze date in such a way that students are only enrolled. For instance, in a single module and then right after the freeze day. The student enrolls in a whole bunch of other coursework and receives a whole lot more Title IV aid with the intent that maybe if the student does withdraw the school would have an easier time of doing an R2T4 calculation or even have to do an R2T4 calculation. We want to make sure that the schools are properly implementing their freeze dates to capture when most of their students are enrolling in coursework and compliance.

In reviewing, school’s policy is determined that the school has been doing this in such a way to try to get around or modify this R2T4 for process because it is optional. The compliance teams could indicate to the school that they have to monitor fluctuations throughout the payment period in the student’s enrollment status and cannot use R2T4 freeze date so you can see here our current regulations. Our guidance has been that if a student is enrolled in future modules but drops those future modules while still attending other coursework, the schools have been able to exclude those future modules and the days of those modules from consideration. If the student completely withdraws later that's being removed under new regs focusing on the modules that are being used to determine the student’s eligibility which as I mentioned also includes modules where they attend at least one day.

We have just a few examples here we're going to focus on some that are with R2T4 freeze date and some without an R2T4 freeze date. Remember, all these examples are trying to determine whether you will have to include the days in particular modules when calculating the denominator for the number of days in R2T4. Example one is no R2T4 freeze date with a Pell. Only the recipient student enrolls in a semester with two eight-week modules. The school uses one calculation date 10 days if they enroll in six hours in Module One and six hours in Module 2. As of the PRD date, they are enrolled in 12 hours. The school pays the student for full-time Pell. The student ended up withdrawing in Module 1 and never attends Module 2. The school performs a mandatory Pell recalculation and they pay them a halftime Pell. Now, since the six hours in Module 2, we're not ultimately used to determine the Title IV eligibility. Remember, they only got half-time Pell and they never attended one day in Module 2 and are not factored into the R2T4 calculation. Now my friends, what you're going to see through a lot of these examples. I had to narrowly develop them in such a way that it would draw exemptions we just covered don't come into play. Remember if the withdrawal exemptions come into play and the student is exempt, you won't have to do these calculations. Please keep that in mind as well.

Our Example 2 is a similar situation, but in this case the school has elected to adopt in R2T4 Freeze day. They enroll in a semester with two eight-week modules. Again, they have a Pell Recalculation date 10 days and the school decides to set their R2T4 freeze date at the same time as there Pell recalculation date which they can do. Student enrolls in six hours in Module 1 and six hours in Module 2. As of the R2T4 freeze date, the student is enrolled in 12 hours in both modules one and two. They pay the student full-time Pell and the student ends up withdrawing in Module 1 and never attends Module 2. School performs a mandatory Pell Recalculation, and they do pay the student only for half-time Pell. However, in this case, since the coursework that the student was enrolled in as of the schools are R2T4 freeze date was for Module 1 and Module 2. The days in both modules are factored into the R2T4 calculation.

In Example 3, we have no R2T4 freeze date for a Pell recipient who later becomes eligible for direct-loan funds. Again, enrolled in this semester with two eight-week modules, one Pell Recalculation date, 10 days in, the student enrolls in three hours in Module 1 as of the PRD date, but a week after the Pell Recalculation date the student enrolls in three more hours in Module 2 and requests a direct loan. The school pays them less than halftime Pell because of the Pell recalculation date. Again, they were only enrolled in three hours, but they also provided direct loan disbursement because the student is registered for halftime and they get that disbursement. The student ends up withdrawing in Module 1 and never attends Module 2. The school does not have to do Pell recalculation, nor do they have to adjust the loan funds because the student was eligible for the loan funds at the time of disbursement. Since the three hours in Module 2 did impact the enrollment status required to establish the student’s Title IV eligibility. This school does not have a freeze day for them to receive the direct loans that course work was required. Therefore, the days in Modules 1 and 2 are factored into the R2T4 calculation.

In this example, they have an R2T4 freeze date. Again, a semester with two eight-week modules they have one Pell Recalculation date which the school also uses as their R2T4 freeze date. As of the R2T4 freeze date, the student is only enrolled in three hours in Module 1 a week after the R2T4 freeze date. They enroll in three hours in Module 2 and requests a direct loan. They're paid less than half time Pell and given the direct loan disbursement. The student ends up withdrawing in Module 1 and never attends Module 2. They do not have to do a Pell recalculation nor adjust loan funds because this student was eligible for the amounts they receive. Since the coursework enrolled the schools freeze date, the R2T4 freeze date was only for Module 1 and the student never attended at least one day in Module 2. Only the days in Module 1 are factored in the R2T4 calculation.

Example 5 is Pell only recipient with no R2T4 freeze date. This semester has five four-week modules. They use Pell recalculation date 10 days and the student enrolled in two credit hour courses in all five modules for a total of 10 hours. As of the PRD date, the students started 2 hours in Module 1 and was enrolled in 10 hours. The school paid the student three quarter time Pell. However, the student completes Module 1, starts attending Module 2, but then decides to completely withdraw. The school does have to perform a mandatory power recalculation and pay the student less than halftime Pell because the student only started 4 hours in Module 1 and in Module 2. Now though, the student was only paid a less than halftime Pell amount which could equate to only the coursework in Module 1. Remember, since the student attended at least one day in Module 2, the days in Module 1 and Module 2 are factored into the R2T4 calculation. This is an example of a school with no R2T4 freeze date.

While our last example is again somewhat similar, it is going to have an R2T4 freeze date. With both Pell and direct loan funds. Student enrolls in a semester with five four-week modules. They use one Pell Recalculation date, 10 days in and they also choose to use their Pell recalculation date. As the R2T4 Freeze date student enrolled in 2-3 credit hour courses in Module 1 as of the R2T4 freeze date, they pay the student halftime Pell and provided direct loan disbursement. Now towards the end of Module 1, the student decides to enroll in a three credit-hour course in Module 2 and a three credit-hour course in Module 3. However, after attending a few days and Module 2, the student completely withdrawn. The school does not have to do Pell recalculation because they only paid them. They have halftime Pell, which equates to what they started in Module 1 and the loan funds did not have to be adjusted because at the time they receive their direct loan disbursement. They were registered or enrolled half time. Now, though, the student was only enrolled in coursework in Module 1 as of the freeze date. Remember, they were only enrolled in six hours in Module 1 as of the freeze date. Since the student attended at least one day in Module 2, but never attended Module 3, the school would include the days in Modules 1 and 2 in the R2T4 calculation. In these different examples we’re trying to showcase freeze dates or no freeze dates. Some of the differences are showing situations where sometimes one way may again appear more beneficial for a student than others.

As mentioned with ASAP, we want to point out there were COVID-19 flexibility's and still are related to R2T4 especially our May 15, 2020 electronic announcement went into quite a bit of detail. We want to point out that as it stands now, these flexibilities will be in place for any payment periods that begin between March 13th and the last date that the national emergency is in effect. I’m sure we all hope that's going to happen soon, but until that does this flexibility is about not having to return Title IV funds. If students withdrew due to COVID-19 and are still in place, there are several resources here to consider, especially in the middle. We have our distance, education, and innovation. Final Federal Register notice to take note of within the Preamble and the actual regulations can provide additional reference and information for you on today's topics.

Finally, if you do have any outstanding questions that are not addressed through our Q and A format at the end of today's session, please note that you can submit your questions through our new. customer support process in FSA's help center. The link is listed here. Remember that when you are submitting a question through this format, one of the items in a drop-down box you will select is a topic, and for questions related to today's webinar. I want to stress, please select the topic FSA, and ask A fed slash policy with that I hope you enjoyed today's webinar.

I'm going to turn it back over to our training officer. Trevor Summers, who will lead our discussion today with our Q& A format Trevor. Thank you very much David were looking over all the questions that have been submitted throughout the presentation and I think we're going to start here with questions related to the satisfactory academic progress topic. Once we get through as many of those as we can, we will shift to the right and return to Title IV funds. I'll turn it over to my colleague Anita to read some of the questions that came in and then the presenters can answer those as appropriate. Anita, I'll turn it over to you. Thank you, Trevor,

The first question that came in regarding ASAP, yes, does the counter option for pace allow for flexibility for various enrollment intensity such as full-time versus three quarter time? Can you opt for calendar time for full-time students, but calculation be based on credit hours for part-time students? Evaluation does not account for calendar time, so our policy is that students within the same program for students within the same program institution must choose to measure pace in calendar time or credit hours.

The second question is do we only have to have a policy for not attending a payment period? Transfer's impact on maximum timeframe if switching to calculating on calendar-time or regardless of whether we are using credit hours or to calculate the quantitative SAP schools to have a transfer policy regardless of using credit or calendar time.

For pace evaluation Question #3, how is its maximum timeframe determined for doctoral student’s max time? Max frame for graduate students is defined by the school that's based on the program length. The graduate programs are not held 150% next time frame. The next question is was the new R2T4 regulations for modular programs intended to be applicable to medical school. I'm sorry this is not an SAP question, but clinical rotations are taught in modules. For non-attendance taking institutions were struggling to determine when in R2T4 is necessary. The new definition of successful completion requires a passing grade and the student earned all apps. Normally they wouldn't be withdrawn. Further, it sounds like they will be needed. They will need to be calculated. Can you answer that one? Yes, this specific regulation is the new exemptions that we put in place. As discussed, were not specifically designed for specific programs beyond the fact that we redefined our program with modules stating that programs that have modules are considered standard or non-standard term academic calendar programs that are not subscription-based with courses that don't go there.

Think beyond that, whether the exemptions apply. You would have to meet the criteria or the student would have to meet the criteria and there's no additional exemptions provided based on the type or the major that the student is particularly in, whether it's medical school or some other type of program. The student could have to successfully complete the requisite number of hours or the modules with the requisite number of days to meet those exemptions.

The next question, does the institution have the option to choose calendar time or to measure in credit hours? Calendar time pace evaluation is just an additional flexibility you can choose. The next question, can we still use our 16 SAP policy, which includes pace? Yes! If a school excepts all transfer credits do schools have the option to only count those hours applicable to the program for a SAP purposes? Yes! The final question on statement, what is the optional maximum time frame rule? Optional? Will a school need to establish a maximum time frame based on these new rules, regardless if we measure by credit hour or calendar? A max time frame is not optional though certain programs are exempt from pace evaluation. Schools still must determine max time frame for all programs.

That concludes that section’s questions regarding SAP and I believe we're going to move on to questions regarding R2T4 and Tasha. OK, this is a Trevor and I think I'm going to read these questions regarding the R2T4. The first question has to do with the module environment. If the modules overlap, you don't count the duplicated days for the 49% calculation. Is that correct? That would be correct. We're looking at the overall number of days that are contained in a module or combination of modules, so we wouldn't want to double count the days in an overlap situation. Thanks!

The next question has to do with modules that have different links and it's lengthy, so bear with me while I read through it. The days in the payment period if we have multiple modules, let's say five seven weeks in an 8-week module, we really don't have days in between modules. However, a student could have a five-week one module and an 8-week second module. Our standard term is 16 weeks or 112 days. For that student, there would be days between modules, but overall, we don't have scheduled days between modules so five weeks of 112 would not be 49%. If we subtract the days between the five weeks in the eight-week course, it would be. Maybe we only count the days in the specific modules that the student was enrolled to complete when they stopped or withdrew. Is that correct? No, so what we're looking at here is this is just a set formula to determine the overall number of days in the payment period in.

Question, we're going to look at the overall days that the student could potentially be enrolled in any course work within that payment period, and then from that total number which is the full length. We’re going to back out any schedule breaks of five consecutive days or more, and then any breaks that currently exist between each module that are within the overall payment period. If all your modules are set up such that there are no breaks in between, then there wouldn't be any breaks to exclude, but if you have five modules within your overall payment period and there is always two days between each module and a break between, then you could exclude those two days from between each of the modules. We're not looking at the modules the students are enrolled in to determine the number of days to exclude. We're looking at the overall days that are in between the modules in the overall payment period.

I don't know if David or Greg want to jump in with a little bit more guidance. You might want to be careful we're not looking at specifically the modules the student is in as far as if there's a break in between those. Again, we're looking at the overall length of the payment period and using that in this calculation to determine whether the student is exempt for R2T4for purposes. I’ll add something to that. This is David Musser. That was a good question and a good answer Dave Bartnicki. Yeah, this isn't really important point and one that we've heard several questions about in the past few months. Since the regulations were published, the total number of days that the denominator for the purpose of determining whether the student is a completer, whether they are exempt from being treated as a withdrawal and having to complete the RR2T4 for calculation. That's always using the total number of days in both modules and full-term courses for the period in question. That's always your denominator for determining the 49% point and then you just look at which modules the student successfully completed and use that as the numerator. We are doing our best to make that a straightforward calculation. These things are never exactly straightforward, but you're not looking at not using them as the denominator.

The days that the student is scheduled to be enrolled in, you're looking at all the days in the period. OK thanks! We will go to the next question regarding enrollment reporting. The question was submitted, will students still be reported on the enrollment report as withdrawn if they’re no longer a R2T4? due to half time enrollment or 47%? Not sure if the questioner meant 49% or 47%, but it came in that way. For purposes of our R2T4, we would say the student is not far from the enrollment purposes. Dave or Greg, I'm not sure if that addressed this formally. I'm also interested in Greg's thoughts on this one, but in these situations there's really two different scenarios.

In one case you hear from the student that he or she is just choosing to withdraw. Let's give an example. Let's say that the student completes a module successfully and completes a module that constitutes more than 49% of the period. They get a passing grade and then the student informs the institution that I’m withdrawing. I'm not continuing in this payment period, and I don't intend to continue in a subsequent payment period. That's a student who withdrew, right? That student will have to report this as a withdrawal the next time that they submit their enrollment reporting, but you would treat that student just like you would treat a student who withdrew between terms.

Let's say a student under normal circumstances completed a term, they got their grade, a “B” or whatever and then three days later, the student said I'm withdrawing, I'm leaving this program and I'm not coming back. Essentially the same process would apply here when a student has successfully completed that module. We treat them as their having completed for purposes of R2T4, but they're leaving so you still must report them. You would just do that in accordance with your normal procedures for reporting a student withdrawn after they've completed a term. Yes, I would. I would agree that it is important to note that just because someone is listed as withdrawn in NSLDS does not mean that there's necessarily an R2T4 for calculation within their file to that withdrawals. That's a good point to make. You will also have some situations Dave and I think I mentioned it earlier. My example, if the student was only scheduled to attend two modules and they completed those modules even though they are done with attendance in that payment period there’s no R2T4 for that case. They're not considered a withdrawal because the intention is that they are coming back next period. You're right. We must look carefully at this just because in R2T4 doesn't have to be done. It doesn't mean that the student is not listed as withdrawn in NSLDS. OK, thanks David.

I would like to go to the next question which is what if a student successfully completes Module 1 which is over 49% of the payment period and earns a “B” then continues and completes Module 2, but earns a F in Module 2. Is this no longer considered in R2T4 situation? Correct. When you're evaluating a student, who withdraws and there's modules involved or the student hasn't graduated early in the hours or days early, then the school does need to evaluate the exemption criteria to determine if the student falls under that. If the student has in fact successfully completed a module or modules with the number of days equaling 49% or more, then R2T4 would not apply. OK thanks.

Just two or three more questions. The next question is with the R2T4 exemptions. Does it literally have to be a passing grade? Students that earned Fs completed that class during the enrollment period. They did not pass it. This is different than a student who received a F for a non-completion of the class. Yes, they must be passing grades. Our definition of successful completion means that the student has earned a passing grade. One quick clarification is there two? Dave is exactly right if, you're talking about meeting the exemption for successfully completing a module, it needs to be a passing grade to consider it successful completion. However, let's say that you've got two modules and the student doesn't complete the first one, but continues to the second one. Let's say the student gets a F in the first one and then it continues to the second one and then gets all the way to the end of the second one and gets an earned F.

Your school has a policy for using earned Fs that differentiates between students who completed the period. Maybe you say that the second is the earned F. In that case the student completed both modules, completed Module 2 with an earned F and they were not scheduled to attend any further classes afterwards. That rule still applies and we want to be clear about that when you get an earned F. At the end of all the modules that you were scheduled to attend, then you're still treated as having completed the period and there's no R2T4 required. What we want to be careful about is people need to understand that the exemption criteria for completing just one module or a combination of modules over 49% that requires a passing grade.

When your student gets to the end of all the student’s classes they were scheduled to attend and then the last one they get that earned F. That student is also still a completer. It's important to note that these exemptions are in addition to a lot of our current guidance that still is in effect. OK, thanks.

The next question, is the freeze date different from the Pell Recalculation date? Yes, they are not one in the same. The Pell Recalculation data specifically used when determining the student’s enrollment status for Pell and teach purposes. It’s used in that respect and the R2T4 freeze date. What we're calling the R2T4 freeze date is used specifically if the school chooses to determine the number of scheduled days in modules for the R2T4 calculations. They could be the exact same date or, as I mentioned, they could be different dates established by the school.

We just had one more question come in and this will be our last question. Do the new regulations negate this statement? The student is scheduled for classes in both modules 1, 2, and 3 weeks before the end of Module 1. He drops all those courses in Module 2 then he completes Module 1. The student is considered to have completed the period because he was not scheduled to attend any other courses when he ceased attendance. No calculation is required. Pell must be recalculated and review those classes on Module 1. Is that still correct? That is not going to our existing policy. As I mentioned in an earlier slide that is what our current regulations and our current guidance discuss. As of July 1, 2021, our IF schools implemented they would need to follow our new definition around determining the scheduled days within modules that the student either attends at least one day or those modules that have impacted the students Title IV eligibility by looking at what the students enrollment status was.

As a freeze date or monitoring the student’s enrollment status throughout their payment period. That guidance was being referenced and will be going away effective July 1, 2021.

Thanks David, that's most of the questions and that's all our time. I just wanted to share some closing comments. We want to thank everyone for joining us in today's webinar. If you have remaining questions, you can submit them through our customer portal helpdesk at FSA partners@ed.gov backslash help center, or you can see the last bullet on this slide. We encourage you to also participate in the two remaining sessions: Distance Education and Institutional Eligibility that will be presented by Greg Martin of OPE/PPI and David Muster of FSA on Monday, April 26th from 2:00 PM to 3:30 PM. Subscription-based programs area also presented by Greg Martin and David Musser on Monday, May 10th from 2:00 PM to 3:30 PM. Thank you everyone for your attendance and those good questions. Have a great day!