WEBVTT

00:00:07.897 --> 00:00:17.277

00:00:21.697 --> 00:00:27.277

00:00:27.277 --> 00:00:37.277

00:00:37.277 --> 00:00:47.277

00:00:47.277 --> 00:00:57.277

00:00:57.277 --> 00:01:07.277

00:01:07.277 --> 00:01:17.277

00:01:17.277 --> 00:01:27.277

00:01:27.277 --> 00:01:37.277

00:01:37.277 --> 00:01:47.277

00:01:47.277 --> 00:01:57.277

00:01:57.277 --> 00:02:07.277

00:02:07.277 --> 00:02:17.277

00:02:17.277 --> 00:02:27.277

00:02:27.277 --> 00:02:37.277

00:02:37.277 --> 00:02:47.277

00:02:47.277 --> 00:02:57.277

00:02:57.277 --> 00:03:07.277

00:03:07.277 --> 00:03:17.277

00:03:17.277 --> 00:03:27.277

00:03:27.277 --> 00:03:37.277

00:03:37.277 --> 00:03:47.277

00:03:56.897 --> 00:03:57.277

00:03:57.297 --> 00:03:59.127

Good morning or afternoon everyone.

00:03:59.927 --> 00:04:03.427

Welcome to the first of three webinars presented by the Office of.

00:04:03.427 --> 00:04:05.007

Postsecondary Education.

00:04:06.137 --> 00:04:09.297

These webinars will provide an overview of the changes.

00:04:09.297 --> 00:04:12.577

to the regulatory requirements in the distance education.

00:04:12.577 --> 00:04:15.697

and innovation regulations which were published on.

00:04:15.697 --> 00:04:19.057

September 2nd, 2020 and will be effective.

00:04:19.057 --> 00:04:22.377

July 1st 2021 unless early.

00:04:22.377 --> 00:04:24.487

implemented by institutions.

00:04:25.847 --> 00:04:28.887

These webinars will provide detailed information about.

00:04:28.887 --> 00:04:32.307

changes to the regulations, including in the distance education.

00:04:32.307 --> 00:04:34.077

and innovation final rules.

00:04:34.817 --> 00:04:38.787

Each webinar will address a separate set of topics from the regulations.

00:04:38.787 --> 00:04:38.787

00:04:39.527 --> 00:04:43.377

Today's webinar will address satisfactory academic progress.

00:04:43.377 --> 00:04:46.737

and return of Title 4 funds. These.

00:04:46.737 --> 00:04:49.797

training materials and recording of the session will.

00:04:49.797 --> 00:04:53.017

be provided shortly. We will notify the community.

00:04:53.017 --> 00:04:54.177

once they are available.

00:04:55.557 --> 00:04:58.267

Today's training will be in listen only mode.

00:04:59.057 --> 00:05:02.387

You will be able to ask questions through the live event question.

00:05:02.387 --> 00:05:05.447

and answer feature by clicking on the Q& A session.

00:05:05.447 --> 00:05:08.517

button at the top right of the webinar screen.

00:05:08.517 --> 00:05:11.587

We will conclude today's webinar with the Q and A.

00:05:11.587 --> 00:05:14.327

session as time permits.

00:05:16.327 --> 00:05:19.577

Today's webinar will be presented by Aaron Washington.

00:05:19.577 --> 00:05:22.057

of the Office of Postsecondary Education.

00:05:22.837 --> 00:05:25.677

And David Bartnicki of Federal student aid.

00:05:26.867 --> 00:05:29.147

I will now turn it over to Aaron Washington.

00:05:32.627 --> 00:05:34.217

Thank you so.

00:05:35.477 --> 00:05:38.857

To start, I'll just go through the agenda with everyone so.

00:05:38.857 --> 00:05:42.007

we're going to start with a brief, high level introduction of how we.

00:05:42.007 --> 00:05:45.327

got to these new regulations I'll cover.

00:05:45.327 --> 00:05:48.407

satisfactory academic progress. I'll turn.

00:05:48.407 --> 00:05:51.747

it over to my colleague David Bartnicki to cover the return.

00:05:51.747 --> 00:05:54.847

of title for aid, and then we'll look at some references and.

00:05:54.847 --> 00:05:58.327

also some contact information for us, and also.

00:05:58.327 --> 00:06:01.347

where you can send questions and again, a time permits.

00:06:01.347 --> 00:06:04.697

will have a question and answer session that will be facilitated.

00:06:04.697 --> 00:06:05.907

by our training officers.

00:06:06.177 --> 00:06:09.477

And we'll also be joined by David David Musser and Gregory.

00:06:09.477 --> 00:06:12.477

Martin to help facilitate also some of those questions as well.

00:06:15.447 --> 00:06:19.217

So the department began to negotations to amend.

00:06:19.217 --> 00:06:23.087

and revise regulations related to satisfactory.

00:06:23.087 --> 00:06:26.157

academic progress and return a title for aid all the way.

00:06:26.157 --> 00:06:29.237

back in 2018. And while the.

00:06:29.237 --> 00:06:32.347

rule was titled Distance Education, an innovation.

00:06:32.347 --> 00:06:35.437

we revised several regulations separate.

00:06:35.437 --> 00:06:38.647

or unrelated to distance education, including SAP and R2T4.

00:06:38.647 --> 00:06:42.067

So we published an NPR M on.

00:06:42.067 --> 00:06:42.927

April 2nd.

00:06:43.287 --> 00:06:46.317

And as with all of our rules, were required.

00:06:46.317 --> 00:06:49.537

to have a comment period for the public to.

00:06:49.537 --> 00:06:52.577

express opinions and offer alternative alternative.

00:06:52.577 --> 00:06:55.767

language. So the final rule was published September 2nd.

00:06:55.767 --> 00:06:58.877

and any role published by November 1st.

00:06:58.877 --> 00:07:02.297

year is effective the July.

00:07:02.297 --> 00:07:05.437

1st is the following year, so our effective date for the.

00:07:05.437 --> 00:07:08.457

rules will discuss today is July 1st.

00:07:08.457 --> 00:07:11.637

2021. However you can all implement.

00:07:11.637 --> 00:07:14.357

The SAP/R2T4for regulations.

00:07:14.407 --> 00:07:17.437

Early even today, and I think you'll hear that throughout the presentation that these are.

00:07:17.437 --> 00:07:19.027

early, implementable regulations.

00:07:21.107 --> 00:07:22.607

So let's move intoSAP.

00:07:25.167 --> 00:07:28.727

The law requires that a student make satisfactory.

00:07:28.727 --> 00:07:32.017

academic progress to maintain eligibility for federal.

00:07:32.017 --> 00:07:35.117

student aid. So each of your institutions.

00:07:35.117 --> 00:07:38.177

should already have a reasonable set policy for.

00:07:38.177 --> 00:07:41.557

monitoring that progress accept.

00:07:41.557 --> 00:07:44.997

policy is reasonable if it meets both the qualitative.

00:07:44.997 --> 00:07:48.057

and quantitative criteria. So your policy.

00:07:48.057 --> 00:07:51.547

has to specify the quantitative standard.

00:07:51.547 --> 00:07:54.667

which is pace that the students must progress through their.

00:07:54.667 --> 00:07:56.057

program to ensure.

00:07:56.117 --> 00:07:59.677

That they'll graduate within the maximum time frame, so.

00:07:59.677 --> 00:08:03.107

currently you all calculate the pace by dividing the.

00:08:03.107 --> 00:08:06.517

total number of hours the student has successfully completed.

00:08:06.517 --> 00:08:09.637

by the total number of hours the student has.

00:08:09.637 --> 00:08:12.867

attempted for the purposes of this presentation will mainly.

00:08:12.867 --> 00:08:16.147

focus on the new regulations for SAP measurement, which.

00:08:16.147 --> 00:08:19.367

is measuring a student space in calendar time, your.

00:08:19.367 --> 00:08:22.807

policy has to specify a qualitative standard as.

00:08:22.807 --> 00:08:25.887

well, which is usually a grade point average, or.

00:08:25.887 --> 00:08:26.887

equivalent that is.

00:08:27.177 --> 00:08:29.547

It must have at each evaluation.

00:08:31.677 --> 00:08:35.367

So our updates to SAP made by the new regulations.

00:08:35.367 --> 00:08:38.807

solely regard the quantitative evaluation.

00:08:38.807 --> 00:08:42.027

and there are only two updates we use.

00:08:42.027 --> 00:08:45.467

this type of chart throughout the presentation to show.

00:08:45.467 --> 00:08:48.527

the changes from the current regulation to the new regulation.

00:08:48.527 --> 00:08:51.797

So the first change is that a SAP review.

00:08:51.797 --> 00:08:54.987

is currently required for abroad programs apace.

00:08:54.987 --> 00:08:58.047

review is currently required for all programs starting July.

00:08:58.047 --> 00:09:01.547

1st or if your if your institution has already early implemented.

00:09:01.547 --> 00:09:02.297

this provision.

00:09:02.547 --> 00:09:05.767

A pace review is no longer required for subscription based.

00:09:05.767 --> 00:09:08.807

programs. Non term programs and clock hour programs.

00:09:08.807 --> 00:09:08.807

00:09:09.927 --> 00:09:13.027

The second change is that currently max time.

00:09:13.027 --> 00:09:16.267

frame for credit hour programs can only be calculated.

00:09:16.267 --> 00:09:19.357

or measured in credit hours. And remember that's done by.

00:09:19.357 --> 00:09:22.457

dividing the total number of hours the student successfully completed.

00:09:22.457 --> 00:09:24.177

by the total number of hours they attempted.

00:09:24.757 --> 00:09:27.817

Our new regulations allow the max time frame for credit hour.

00:09:27.817 --> 00:09:31.207

programs to be calculated or measured in calendar time.

00:09:31.207 --> 00:09:34.267

or credit hours. So you have your choice using.

00:09:34.267 --> 00:09:37.657

calendar time may make more sense for certain programs.

00:09:37.657 --> 00:09:41.187

especially those where coursework or enrollment status is.

00:09:41.187 --> 00:09:44.687

prescribed. However, you can maintain your current policy.

00:09:44.687 --> 00:09:48.437

There's no requirement to change to the new regulations.

00:09:48.437 --> 00:09:48.517

00:09:51.667 --> 00:09:55.027

So the next few slides we highlight why the department?

00:09:55.027 --> 00:09:58.877

exempted certain programs from the pace review there.

00:09:58.877 --> 00:10:02.377

will be an in depth webinar on subscription based programs.

00:10:02.377 --> 00:10:05.877

on May 10th, but as a brief overview subscription.

00:10:05.877 --> 00:10:08.927

based programs charge students for a term and the.

00:10:08.927 --> 00:10:12.017

student has to complete a specified number of credit hours within.

00:10:13.197 --> 00:10:16.567

A student cannot receive subsequent subsequent disbursement.

00:10:16.567 --> 00:10:19.937

of federal student aid until the credit hour or equivalent.

00:10:19.937 --> 00:10:23.107

in the prior payment periods are complete, so.

00:10:23.107 --> 00:10:26.307

the department determined that this obviates.

00:10:26.307 --> 00:10:29.407

the need for an institution. Institutions SAP that policy to.

00:10:29.407 --> 00:10:32.747

specify pace for a student in a subscription based.

00:10:32.747 --> 00:10:36.047

program because the student cannot continue to receive Federal student aid without progressing

00:10:42.477 --> 00:10:45.657

Similar concept rings true for non term credit hour programs.

00:10:45.657 --> 00:10:49.127

in clock hour programs prior to receiving a subsequent.

00:10:49.127 --> 00:10:52.527

disbursement, a student must successfully complete 1/2.

00:10:52.527 --> 00:10:56.007

of the hours and weeks in academic year again.

00:10:56.007 --> 00:10:59.107

obviating the need for pacing valuation in.

00:10:59.107 --> 00:11:00.147

these types of programs.

00:11:04.927 --> 00:11:07.937

So Max time frame after exceeding Max.

00:11:07.937 --> 00:11:11.097

time frame, a student is no longer eligible for.

00:11:11.097 --> 00:11:14.257

federal student aid. To determine max time.

00:11:14.257 --> 00:11:17.577

frame for undergraduate program in calendar time you.

00:11:17.577 --> 00:11:20.677

multiply the published length of the program by 150%.

00:11:20.677 --> 00:11:24.007

The flexibility extends to graduate.

00:11:24.007 --> 00:11:27.477

programs. However, Max time frame for graduate programs.

00:11:27.477 --> 00:11:30.657

is a period the school defines and is.

00:11:30.657 --> 00:11:32.347

based on the length of the program.

00:11:32.937 --> 00:11:36.107

So we've already gotten the question is, can a school switch

00:11:36.107 --> 00:11:39.327

back and forth between calendar time and credit hour pace?

00:11:39.327 --> 00:11:42.447

evaluations in the same program? And the answer is no, you.

00:11:42.447 --> 00:11:45.707

must set measurements for all students in the same program.

00:11:45.707 --> 00:11:48.947

and also very important. I probably say that a lot throughout the presentation.

00:11:48.947 --> 00:11:52.287

This is very important to know, but it is really important to know that.

00:11:52.287 --> 00:11:55.347

calendar time does not account for individual.

00:11:55.347 --> 00:11:58.657

student enrollment status changes. The.

00:11:58.657 --> 00:12:00.787

credit hour pace completion does.

00:12:02.347 --> 00:12:06.067

But the calendar time does not the.

00:12:06.067 --> 00:12:09.157

last thing that will know on this slide is just.

00:12:09.157 --> 00:12:12.407

emphasizing that while we no longer require.

00:12:12.407 --> 00:12:15.737

a pace review for non term programs, the max time.

00:12:15.737 --> 00:12:17.797

frame still exists for all programs.

00:12:22.487 --> 00:12:25.937

So continuing with max time, Max time frame your school.

00:12:25.937 --> 00:12:28.957

has to have a policy for addressing how.

00:12:28.957 --> 00:12:32.337

not attending a payment period or multiple payment periods.

00:12:32.337 --> 00:12:35.767

impact the max time frame. So let's say your schools.

00:12:35.767 --> 00:12:38.877

policy is to not alter the max time frame.

00:12:38.877 --> 00:12:39.707

the students.

00:12:41.237 --> 00:12:45.607

The students required required hours for program completion.

00:12:45.607 --> 00:12:48.627

Sorry, started, so let's.

00:12:48.627 --> 00:12:51.927

say your school’sgood policy.

00:12:51.927 --> 00:12:54.967

is to not alter the max time frame for the students required.

00:12:54.967 --> 00:12:58.327

hours for the program. Completion will then need to be adjusted.

00:12:58.327 --> 00:13:01.487

If your school’s policy also could.

00:13:01.487 --> 00:13:04.547

be, it could be to exclude none attended.

00:13:04.547 --> 00:13:08.187

payment periods which would not require.

00:13:08.187 --> 00:13:11.387

any adjustments to required hours. And I know I kind of jumbled

00:13:11.387 --> 00:13:11.387

00:13:11.677 --> 00:13:14.707

That a little bit, but we'll see examples of all.

00:13:14.707 --> 00:13:17.867

of these things. I'm going to say 'cause I'm more of a visual person is anyway so.

00:13:17.867 --> 00:13:20.907

I think hopefully all this will become clear to you when.

00:13:20.907 --> 00:13:22.497

we get the to the examples.

00:13:23.727 --> 00:13:26.767

You must also have a transfer policy which outlines a reasonable.

00:13:26.767 --> 00:13:30.287

approach to address how transfer hours impacts.

00:13:30.287 --> 00:13:33.307

app and max time frame. So for example, your school.

00:13:33.307 --> 00:13:36.507

could have a policy that 12 semester semester credits.

00:13:36.507 --> 00:13:39.647

transferred in equal 1 payment period and this.

00:13:39.647 --> 00:13:42.967

scenario if a student in a 2 year program with the max.

00:13:42.967 --> 00:13:46.137

time frame of three years transferring 12 credits.

00:13:46.137 --> 00:13:49.507

your institution would reduce the max time frame by.

00:13:49.507 --> 00:13:52.717

one payment period and determine the structure of the remaining number.

00:13:52.717 --> 00:13:55.227

of credits required at each valuation point.

00:13:55.287 --> 00:13:58.397

Based on 2 1/2 years to complete versus three years.

00:13:58.397 --> 00:14:00.297

and again, we'll see an example of this as well.

00:14:04.747 --> 00:14:07.877

So to review, currently many.

00:14:07.877 --> 00:14:10.917

schools that offer credit hour programs divide the cumulative number.

00:14:10.917 --> 00:14:14.237

of hours a student successfully completed by the cumulative number.

00:14:14.237 --> 00:14:17.677

of hours the student has attempted the new regulations.

00:14:17.677 --> 00:14:20.997

allow you to express SAP pace in calendar time.

00:14:20.997 --> 00:14:24.257

by determining the number of hours that the student should.

00:14:24.257 --> 00:14:27.357

have completed at each evaluation point if you're.

00:14:27.357 --> 00:14:31.447

using calendar time, your school determines the number of hours to.

00:14:31.447 --> 00:14:31.447

00:14:31.497 --> 00:14:34.607

Complete each each payment period based on the published

00:14:34.607 --> 00:14:38.107

s length of the program and this is part of your schools on policy.

00:14:38.107 --> 00:14:41.377

and all of the upcoming examples. Every single one of them, the department.

00:14:41.377 --> 00:14:44.627

has reasonably determine the number of required hours.

00:14:44.627 --> 00:14:47.907

for each evaluation point, but your schools policy.

00:14:47.907 --> 00:14:50.977

relating to the reasonable number of hours required.

00:14:50.977 --> 00:14:54.517

could differ from What Department shows.

00:14:54.517 --> 00:14:57.677

in our examples, and this could differ because.

00:14:57.677 --> 00:15:01.077

you might have different term structures or different coursework requirements.

00:15:01.077 --> 00:15:03.987

or different other program requirements that we haven't accounted for.

00:15:04.067 --> 00:15:07.277

These are just examples in your schools could have different.

00:15:07.277 --> 00:15:09.857

reasonable number of hours required.

00:15:11.927 --> 00:15:12.867

Per your policy.

00:15:15.347 --> 00:15:18.437

So let's dive into some examples. Here you can.

00:15:18.437 --> 00:15:21.607

see we have a pretty straightforward example of.

00:15:21.607 --> 00:15:24.917

a four year program. We've multiplied the four years.

00:15:24.917 --> 00:15:28.217

which is the published limited length of the program.

00:15:28.217 --> 00:15:29.517

times 150%.

00:15:30.617 --> 00:15:33.947

That results in the student having 6.

00:15:33.947 --> 00:15:37.587

years to complete a four year program to maintain federal student aid eligibility.

00:15:37.587 --> 00:15:41.017

For example, we've broken out the lack the.

00:15:41.017 --> 00:15:44.067

least amount of credits that the student would need to.

00:15:44.067 --> 00:15:47.577

achieve at the end of each.

00:15:47.577 --> 00:15:51.047

award year. So if your institution has 4.

00:15:51.047 --> 00:15:54.127

your credit hour program, you're not required to break out the.

00:15:54.127 --> 00:15:57.147

credits exactly. I've seen on the slide your institution.

00:15:57.147 --> 00:16:00.617

can elect to have its own policy on the least amount of credits.

00:16:00.617 --> 00:16:00.617

00:16:00.667 --> 00:16:04.257

per award year that off all within the maximum time frame.

00:16:04.257 --> 00:16:04.257

00:16:09.257 --> 00:16:12.527

Here's another example of measuring Max time frame in calendar time.

00:16:12.527 --> 00:16:15.787

by payment period. So instead of.

00:16:15.787 --> 00:16:18.807

instead of the year, we're going by the payment period and this.

00:16:18.807 --> 00:16:21.947

example we have a two year program. We've multiplied the two.

00:16:21.947 --> 00:16:25.427

year published length of the program times 150% and the.

00:16:25.427 --> 00:16:28.567

student has three years to complete his program.

00:16:28.567 --> 00:16:31.597

and maintain that pace with this message.

00:16:31.597 --> 00:16:34.717

With this method, that student has the benefit of.

00:16:34.717 --> 00:16:35.907

being placed on a warning.

00:16:36.177 --> 00:16:39.527

I mean he is not maintaining SAP a warning is a status.

00:16:39.527 --> 00:16:39.527

00:16:41.417 --> 00:16:44.527

I want to go to school assigned to a student who is failing.

00:16:44.527 --> 00:16:48.027

to make satisfactory satisfactory academic progress the.

00:16:48.027 --> 00:16:51.247

school reinstates eligibility for a.

00:16:51.247 --> 00:16:54.567

for one payment period and they may do so without the student.

00:16:54.567 --> 00:16:56.697

having to go through an appeal.

00:16:57.727 --> 00:17:00.767

In this example of the program also have optional.

00:17:00.767 --> 00:17:03.807

summers for optional for the. For national summer there is.

00:17:03.807 --> 00:17:07.167

no minimum number of hours required.

00:17:07.167 --> 00:17:07.857

to be completed.

00:17:13.887 --> 00:17:17.157

So here we have the same example from the previous slide except.

00:17:17.157 --> 00:17:20.617

that this time the summers are not optional the program.

00:17:20.617 --> 00:17:23.757

still has a max time frame of three years, but.

00:17:23.757 --> 00:17:27.287

because the summer is required, the school has assigned a smaller.

00:17:27.287 --> 00:17:30.687

minimum number of credits. A student would need to complete each.

00:17:30.687 --> 00:17:34.057

payment period to help with the visual we've also shown.

00:17:34.057 --> 00:17:37.517

on the slide that each award year consists of three.

00:17:37.517 --> 00:17:39.287

mandatory payment periods.

00:17:39.337 --> 00:17:42.387

And notice that the student completes the same number of minimum hours at.

00:17:42.387 --> 00:17:44.997

the end of each award year as the previous slide.

00:17:51.107 --> 00:17:54.177

So this is a four year program that.

00:17:54.177 --> 00:17:57.267

is a stand alone part time version.

00:17:57.267 --> 00:18:00.397

of a two year program. So this is not an example.

00:18:00.397 --> 00:18:03.727

of a student enrolled in a part time program, remember?

00:18:03.727 --> 00:18:06.817

calendar time, pace evaluation does not.

00:18:06.817 --> 00:18:09.847

account for individual student enrollment status changes.

00:18:09.847 --> 00:18:11.447

like the credit hour measurement does.

00:18:12.897 --> 00:18:15.987

I'll also continue to reiterate that your.

00:18:15.987 --> 00:18:19.287

school can determine minimum number of hours per year.

00:18:19.287 --> 00:18:22.587

to complete based on coursework, perhaps.

00:18:22.587 --> 00:18:25.777

your school would develop a different configuration of.

00:18:25.777 --> 00:18:28.907

minimum number of credits per year within the six year max time.

00:18:28.907 --> 00:18:32.087

frame that differ based on the.

00:18:32.087 --> 00:18:35.227

structure of the program, the coursework, or other program.

00:18:35.227 --> 00:18:35.897

requirements.

00:18:41.897 --> 00:18:45.237

So remember that school must develop a reasonable.

00:18:45.237 --> 00:18:48.447

policy to account for the number of hours that transfer into.

00:18:48.447 --> 00:18:51.807

calendar time. The department will not prescribe a policy.

00:18:51.807 --> 00:18:55.427

and this example of a student transfers into your institution.

00:18:55.427 --> 00:18:58.467

with 24 credit hours towards 120.

00:18:58.467 --> 00:19:01.627

credit hour program leaving 96 remaining.

00:19:01.627 --> 00:19:04.867

hours to complete. The school's policy is that 12.

00:19:04.867 --> 00:19:07.947

semester credits equals one payment period. Your school could have a.

00:19:07.947 --> 00:19:11.047

policy that reasonably determines a different number of.

00:19:11.047 --> 00:19:11.867

credits.

00:19:11.917 --> 00:19:15.147

That equates to a payment period, but in this scenario.

00:19:15.147 --> 00:19:18.737

the student is allowed to transfer one full.

00:19:18.737 --> 00:19:21.837

award year worth of credits into the new program.

00:19:21.837 --> 00:19:24.977

the next to school determines the.

00:19:24.977 --> 00:19:28.067

max time frame for the new program, which is 6 years.

00:19:28.067 --> 00:19:29.527

in our example of a program.

00:19:30.387 --> 00:19:33.837

The school, then subtracts the one year.

00:19:33.837 --> 00:19:37.057

from Max time frame because it determined that the student transferred in.

00:19:37.057 --> 00:19:40.277

one year credit hours. So in several of our examples.

00:19:40.277 --> 00:19:43.397

to this point we've been able to evenly divide remaining.

00:19:43.397 --> 00:19:46.457

credits by the remaining years, however.

00:19:46.457 --> 00:19:49.637

with this example that would yield fractions. So unless.

00:19:49.637 --> 00:19:53.087

you're awarding fractions of credits required

00:19:53.087 --> 00:19:55.187

credits must be in whole numbers.

00:20:01.927 --> 00:20:05.177

So if a student stops attending for an academic year and.

00:20:05.177 --> 00:20:08.217

subsequently re enrolls per your policy.

00:20:08.217 --> 00:20:11.407

you can take their approach on this slide or.

00:20:11.407 --> 00:20:13.187

a different approach on the next slide.

00:20:14.687 --> 00:20:18.097

You will not. You will not.

00:20:18.097 --> 00:20:22.187

You will note on this slide that.

00:20:22.187 --> 00:20:25.237

each approach maintains a 6 year maximum timeframe so.

00:20:25.237 --> 00:20:28.397

in this example the student leaves for two at.

00:20:28.397 --> 00:20:31.527

least for year two, and the student decides to not extend.

00:20:31.527 --> 00:20:34.577

the max time frame in the school. Sorry, decides to not extend

00:20:34.577 --> 00:20:37.617

time frame it retains the original.

00:20:37.617 --> 00:20:40.737

six year period. So the student here has to make up.

00:20:40.737 --> 00:20:43.817

the credit hours lost from not attending the second year.

00:20:43.817 --> 00:20:45.377

in order to keep that pace.

00:20:45.757 --> 00:20:48.967

And the minimum hours have been have to be adjusted to.

00:20:48.967 --> 00:20:51.317

account for the students new pace requirement.

00:20:58.217 --> 00:20:59.197

The school

00:21:00.187 --> 00:21:03.357

The school this school chose for.

00:21:03.357 --> 00:21:06.557

its SAP policy a different approach in which the second year was.

00:21:06.557 --> 00:21:09.767

excluded from the max time frame and the students required.

00:21:09.767 --> 00:21:13.097

hours were not altered by his absence.

00:21:13.097 --> 00:21:13.097

00:21:19.607 --> 00:21:22.637

So everything discussed in this section provides.

00:21:22.637 --> 00:21:25.817

additional SAP flexibility, so your school.

00:21:25.817 --> 00:21:30.107

does not have to adopt these options that policies these policies.

00:21:30.107 --> 00:21:33.337

serve as a federal minimum and your policies could be more restrictive.

00:21:33.337 --> 00:21:36.277

So this so everything that we've discussed is optional.

00:21:37.827 --> 00:21:40.917

Well SAP is not optional, but yeah, using.

00:21:40.917 --> 00:21:43.257

calendar time is optional to measure SAP pace.

00:21:46.517 --> 00:21:49.827

And finally, the CARES Act provided additional.

00:21:49.827 --> 00:21:52.877

flexibilities to institutions regarding the calculation.

00:21:52.877 --> 00:21:56.317

 of SAP, so schools continue to be able to as a result.

00:21:56.317 --> 00:21:59.887

of covid, to exclude from the quantitative.

00:21:59.887 --> 00:22:03.067

component of the SAP calculation any attempted credits.

00:22:03.067 --> 00:22:06.687

that were not completed by the student without requiring an appeal so.

00:22:06.687 --> 00:22:10.387

we provided an example on how to calculate set pace when.

00:22:10.387 --> 00:22:14.447

attempted credits are not completed due to covid in the May 15th.

00:22:14.447 --> 00:22:15.887

Electronic announcement.

00:22:16.197 --> 00:22:19.807

and , so now I'll turn it over to David Bartnicki to discuss.

00:22:19.807 --> 00:22:20.727

Return of title IV aid

00:22:27.817 --> 00:22:30.877

00:22:27.817 --> 00:22:30.877

Thank you Aaron for that great summary of.

00:22:30.877 --> 00:22:34.437

our new SAP regulations.

00:22:34.437 --> 00:22:38.867

As mentioned, my name is David Bartnicki, program specialist.

00:22:38.867 --> 00:22:41.967

with policy implementation, an oversight.

00:22:42.677 --> 00:22:45.707

And I drew the short straw. I mean, I was given the honor.

00:22:45.707 --> 00:22:49.207

to talk about R2T4 today or.

00:22:49.207 --> 00:22:52.267

what we affectionately call return of Title.

00:22:52.267 --> 00:22:55.467

4 funds as under the law.

00:22:55.467 --> 00:22:58.637

and under our Regulations 668.

00:22:58.637 --> 00:23:02.327

22 If a title 4 recipient.

00:23:02.327 --> 00:23:05.827

who actually started attendance within a payment period.

00:23:05.827 --> 00:23:09.597

or period of enrollment completely withdraws.

00:23:09.597 --> 00:23:13.017

from that institution, the institution.

00:23:13.017 --> 00:23:13.017

00:23:13.067 --> 00:23:16.397

Must perform an R2T4 calculation to.

00:23:16.397 --> 00:23:19.857

determine how much of the Title 4 funds.

00:23:19.857 --> 00:23:23.037

a student has earned and what, if any, May.

00:23:23.037 --> 00:23:26.257

have to be returned to the department if.

00:23:26.257 --> 00:23:29.607

a student earns more than 60%.

00:23:29.607 --> 00:23:33.057

within a payment period or period of enrollment. The student.

00:23:33.057 --> 00:23:36.137

has earned 100% of title 4.

00:23:36.137 --> 00:23:39.797

aid. What we're going to discuss today.

00:23:39.797 --> 00:23:42.917

are some new regulations, some new options, some new.

00:23:42.917 --> 00:23:43.977

Flex abilities.

00:23:44.257 --> 00:23:47.687

Within 668.22 and.

00:23:47.687 --> 00:23:50.887

as Aaron mentioned, these new regulations become.

00:23:50.887 --> 00:23:54.287

effective July 1, 2021.

00:23:54.287 --> 00:23:57.807

or earlier. If your school chose to implement.

00:23:57.807 --> 00:24:00.977

these regulations earlier, I do want to.

00:24:00.977 --> 00:24:04.207

point out that if you did not implement the R2T4

00:24:04.207 --> 00:24:07.247

regulations early, which is perfectly fine.

00:24:07.247 --> 00:24:10.487

Note that the new regulations will apply.

00:24:10.487 --> 00:24:13.527

to students who withdraw or otherwise.

00:24:13.527 --> 00:24:14.887

cease attendance and that.

00:24:14.937 --> 00:24:18.287

Includes graduate from a program and.

00:24:18.287 --> 00:24:21.927

that's because one of our exemptions focuses on graduates.

00:24:21.927 --> 00:24:21.927

00:24:22.917 --> 00:24:26.087

If they would draw or otherwise cease attendants on or.

00:24:26.087 --> 00:24:29.337

after July 1st, 2021.

00:24:29.337 --> 00:24:32.547

now I stress this because these new.

00:24:32.547 --> 00:24:35.667

regulation time frames are not based on.

00:24:35.667 --> 00:24:39.107

when the students payment period starts or ends.

00:24:39.107 --> 00:24:42.187

but instead focuses on the timing of when.

00:24:42.187 --> 00:24:45.807

the student actually withdraws or ceases attendance. So please keep that in mind

00:24:49.237 --> 00:24:52.837

Now we had various areas within our regulations that we have.

00:24:52.837 --> 00:24:56.177

enhanced, updated, modified. One of them was the order.

00:24:56.177 --> 00:24:59.207

of return when a student withdraws as you can.

00:24:59.207 --> 00:25:02.497

note on this slide we have moved the Iraq.

00:25:02.497 --> 00:25:06.037

and Afghanistan service grant up into.

00:25:06.037 --> 00:25:09.377

the number 5 slot within the Order of return.

00:25:09.377 --> 00:25:12.467

Now ahead of FSEOG and teach grants.

00:25:12.467 --> 00:25:12.467

00:25:13.097 --> 00:25:16.187

As you can see on this particular slide.

00:25:16.187 --> 00:25:19.517

or current regulations has a different order an.

00:25:19.517 --> 00:25:22.807

in fact the new regulations remove outdated.

00:25:22.807 --> 00:25:26.587

title 4 programs that are no longer in affect you.

00:25:26.587 --> 00:25:29.627

can see Perkins, ACG and smart.

00:25:29.627 --> 00:25:32.907

have been removed from our order of return.

00:25:32.907 --> 00:25:32.907

00:25:34.727 --> 00:25:38.797

We also updated or modified various definitions.

00:25:38.797 --> 00:25:42.167

under 668.22. One of those.

00:25:42.167 --> 00:25:45.677

was the approved leave of absence or LOA

00:25:45.677 --> 00:25:48.787

This specific definition, or part of the.

00:25:48.787 --> 00:25:52.737

definition, expanded the LOA requirements.

00:25:52.737 --> 00:25:56.197

to subscription based programs and.

00:25:56.197 --> 00:25:59.957

as Aaron mentioned, the subscription based programs.

00:25:59.957 --> 00:26:03.097

is a new defined program.

00:26:03.097 --> 00:26:05.277

that we discuss in various.

00:26:05.327 --> 00:26:08.777

Regulations throughout the September 2nd.

00:26:08.777 --> 00:26:12.037

Federal Register Notice, but it's also mentioned.

00:26:12.037 --> 00:26:15.397

here couple of times within our return of Title 4.

00:26:15.397 --> 00:26:18.817

rules. We specifically state that clock hour.

00:26:18.817 --> 00:26:21.987

non term credit and now subscription.

00:26:21.987 --> 00:26:25.277

based programs do not have to permit the student.

00:26:25.277 --> 00:26:28.877

to complete coursework. The student began prior.

00:26:28.877 --> 00:26:32.057

to the leave of absence so you can see in our little.

00:26:32.057 --> 00:26:35.617

chart under the current regulations we don't address.

00:26:35.617 --> 00:26:37.327

subscription based programs.

00:26:37.367 --> 00:26:40.837

But now we will, under our new regulations.

00:26:40.837 --> 00:26:40.837

00:26:42.487 --> 00:26:45.557

We also enhanced the.

00:26:45.557 --> 00:26:48.797

definition of academic attendance and attendance.

00:26:48.797 --> 00:26:53.067

at an academically related activity, specifically.

00:26:53.067 --> 00:26:56.337

under our definition within 668 point 22.

00:26:56.337 --> 00:26:59.457

for academic attendants we.

00:26:59.457 --> 00:27:02.737

further clarified and enhanced it by adding in.

00:27:02.737 --> 00:27:05.837

the reference to our new academic.

00:27:05.837 --> 00:27:09.317

engagement definition, which we can find.

00:27:09.317 --> 00:27:12.977

under 34 CFR 600 point.

00:27:12.977 --> 00:27:12.977

00:27:13.037 --> 00:27:16.207

Two, if we take a look at.

00:27:16.207 --> 00:27:19.557

the new academic engagement definition, which.

00:27:19.557 --> 00:27:22.647

definitely enhances our definition.

00:27:22.647 --> 00:27:26.367

as it relates to academic attendance, you can see a variety.

00:27:26.367 --> 00:27:29.867

of enhanced phrasing and areas.

00:27:29.867 --> 00:27:33.917

directly related to academic attendance specifically.

00:27:33.917 --> 00:27:37.337

we're talking about active participation by a student.

00:27:37.337 --> 00:27:40.467

in an instructional activity we.

00:27:40.467 --> 00:27:43.277

talk about attending synchronous classes.

00:27:43.327 --> 00:27:47.087

Lecture re citation field or laboratory.

00:27:47.087 --> 00:27:50.507

activity, physically or online, where?

00:27:50.507 --> 00:27:54.237

there is an opportunity for interaction between the instructors.

00:27:54.237 --> 00:27:57.247

and students, we mention assessments.

00:27:57.247 --> 00:28:00.397

interactive tutorials, webinars, group.

00:28:00.397 --> 00:28:04.197

projects, etc. We really tried to enhance.

00:28:04.197 --> 00:28:07.397

the area of academic engagement and what.

00:28:07.397 --> 00:28:10.437

can constitute attendance or attendance at.

00:28:10.437 --> 00:28:13.637

an academically related activity. Now I do want to point.

00:28:13.637 --> 00:28:16.717

out at the bottom of the right hand side of this chart.

00:28:16.717 --> 00:28:16.717

00:28:16.777 --> 00:28:19.967

You notice in the definition of academic engagement we.

00:28:19.967 --> 00:28:23.247

still have the list of.

00:28:23.247 --> 00:28:26.717

items that are not considered academic.

00:28:26.717 --> 00:28:29.787

attendance or academic engagement and you.

00:28:29.787 --> 00:28:33.367

can see one of those key items is still simply.

00:28:33.367 --> 00:28:36.427

logging into an online class or.

00:28:36.427 --> 00:28:39.647

tutorial without any further participation.

00:28:39.647 --> 00:28:42.677

is still not considered to be attendance.

00:28:42.677 --> 00:28:45.767

and I bring that to your attention because that's important for all.

00:28:45.767 --> 00:28:46.737

of our schools out.

00:28:46.787 --> 00:28:50.457

There that are working with and developing.

00:28:50.457 --> 00:28:52.287

online coursework.

00:28:53.897 --> 00:28:57.397

We also modified the definition of modules.

00:28:57.397 --> 00:28:57.397

00:28:58.157 --> 00:29:01.407

We now state in our new regulations.

00:29:01.407 --> 00:29:04.687

that a program is offered in modules if.

00:29:04.687 --> 00:29:07.727

the program uses a standard term or.

00:29:07.727 --> 00:29:10.767

non standard term academic calendar.

00:29:10.767 --> 00:29:14.457

not subscription based and.

00:29:14.457 --> 00:29:17.787

the courses in that particular program do not span.

00:29:17.787 --> 00:29:21.197

the entire length of the payment period or period of enrollment.

00:29:21.197 --> 00:29:24.207

Why is this important? Well, if you look at.

00:29:24.207 --> 00:29:27.707

the chart on this slide, you'll note that our current regulations.

00:29:27.707 --> 00:29:29.237

don't define.

00:29:29.287 --> 00:29:32.297

Programs with modules by certain types of.

00:29:32.297 --> 00:29:35.337

programs in affect any program could.

00:29:35.337 --> 00:29:38.497

potentially be considered a program with modules, but.

00:29:38.497 --> 00:29:41.877

as noted under our new regulations, effective July.

00:29:41.877 --> 00:29:45.437

1st, 2021, we specifically define.

00:29:45.437 --> 00:29:48.617

these programs with modules as standard term.

00:29:48.617 --> 00:29:51.927

or non standard term programs that are not

00:29:51.927 --> 00:29:54.997

subscription based and this becomes important when.

00:29:54.997 --> 00:29:59.557

we're trying to apply certain regulations specifically.

00:29:59.557 --> 00:29:59.557

00:29:59.607 --> 00:30:01.787

For programs with modules.

00:30:04.207 --> 00:30:07.227

Now we also talk about in our.

00:30:07.227 --> 00:30:10.757

new regulations some modifications to.

00:30:10.757 --> 00:30:10.757

00:30:11.387 --> 00:30:14.397

The consideration as to when a student is.

00:30:14.397 --> 00:30:17.677

considered to be withdrawn and we do so.

00:30:17.677 --> 00:30:21.337

by the different types of academic programs or academic.

00:30:21.337 --> 00:30:24.507

calendars. Specifically, we state for a.

00:30:24.507 --> 00:30:27.797

student in a standard or non standard term program.

00:30:27.797 --> 00:30:30.897

again excluding subscription based A.

00:30:30.897 --> 00:30:34.237

student is considered withdrawn if the student ceases.

00:30:34.237 --> 00:30:37.457

attendance. And is not scheduled to begin another.

00:30:37.457 --> 00:30:40.557

course in that payment period. Or period of enrollment.

00:30:40.557 --> 00:30:43.497

for more than 45 calendar days.

00:30:43.557 --> 00:30:46.607

After the end of the module they ceased attending.

00:30:46.607 --> 00:30:49.967

again. We're talking about standard or non standard term.

00:30:49.967 --> 00:30:53.207

programs for subscription based and non.

00:30:53.207 --> 00:30:56.697

term programs we consider a student withdrawn.

00:30:56.697 --> 00:30:59.747

if they're unable to resume attendance within their.

00:30:59.747 --> 00:31:03.167

payment period or period of enrollment for more than 60.

00:31:03.167 --> 00:31:06.367

days after ceasing attendance.

00:31:06.367 --> 00:31:10.347

and all of these days, we're referring to are calendar days.

00:31:10.347 --> 00:31:10.347

00:31:11.287 --> 00:31:14.367

So you can see here again in our chart comparing current.

00:31:14.367 --> 00:31:17.557

regulations to new regulations. Note that currently.

00:31:17.557 --> 00:31:20.787

we do not have time frames associated with.

00:31:20.787 --> 00:31:24.337

when a future module start within a standard.

00:31:24.337 --> 00:31:28.347

term, so we've added a timeframe threshold.

00:31:28.347 --> 00:31:31.417

for our standard terms. You can also see.

00:31:31.417 --> 00:31:34.717

that for our non term programs we modified.

00:31:34.717 --> 00:31:38.137

the threshold time frame from 45 calendar.

00:31:38.137 --> 00:31:41.407

days to 60 calendar days and of course.

00:31:41.407 --> 00:31:41.407

00:31:41.457 --> 00:31:45.377

We have added subscription based program as well.

00:31:45.377 --> 00:31:45.377

00:31:48.177 --> 00:31:51.607

We also have specifically.

00:31:51.607 --> 00:31:55.627

outlined when a student can provide written confirmation.

00:31:55.627 --> 00:31:58.767

which can suspend the potential need.

00:31:58.767 --> 00:32:02.087

for a withdrawal calculation in.

00:32:02.087 --> 00:32:05.667

certain circumstances. A student is not considered.

00:32:05.667 --> 00:32:09.207

to have withdrawn if the institution obtains.

00:32:09.207 --> 00:32:12.407

written confirmation from the student at the time.

00:32:12.407 --> 00:32:15.567

of withdrawal that he or she will attend a later.

00:32:15.567 --> 00:32:18.627

module within that same payment period.

00:32:18.627 --> 00:32:18.627

00:32:18.707 --> 00:32:21.817

Or period of enrollment. This is not new.

00:32:21.817 --> 00:32:24.927

however. What is new and has been modified?

00:32:24.927 --> 00:32:28.257

are again those time frames those thresholds.

00:32:28.257 --> 00:32:31.707

of when that future module must start.

00:32:31.707 --> 00:32:35.197

So again for standard and non standard term programs.

00:32:35.197 --> 00:32:38.437

that are not subscription based that future module.

00:32:38.437 --> 00:32:41.757

must begin no later than 45 calendar days.

00:32:41.757 --> 00:32:45.797

after the end of the module the student ceased attending.

00:32:45.797 --> 00:32:48.857

for our subscription based programs this.

00:32:48.857 --> 00:32:50.337

written confirmation.

00:32:50.387 --> 00:32:53.657

Being provided at the time they withdraw must.

00:32:53.657 --> 00:32:56.797

indicate that they're going to resume attendance.

00:32:56.797 --> 00:32:59.857

within the same payment period or period.

00:32:59.857 --> 00:33:03.137

of enrollment, and that's key for subscription based programs.

00:33:03.137 --> 00:33:06.267

and is no later than 60 calendar days.

00:33:06.267 --> 00:33:09.007

after the students ceased attendance.

00:33:10.417 --> 00:33:13.567

And for our non term programs when the student.

00:33:13.567 --> 00:33:16.847

provides written confirmation at the time there withdrawing.

00:33:16.847 --> 00:33:20.327

they must be able to resume attendance.

00:33:20.327 --> 00:33:23.377

no later than 60 calendar days after.

00:33:23.377 --> 00:33:25.207

they cease attendance.

00:33:27.677 --> 00:33:30.697

And again, as we currently have in our.

00:33:30.697 --> 00:33:33.737

current regulations, but being modified based upon the.

00:33:33.737 --> 00:33:37.047

different time frames under our new regulations, a student.

00:33:37.047 --> 00:33:40.247

can still change the date of their return.

00:33:40.247 --> 00:33:43.507

and actually begin a later module within.

00:33:43.507 --> 00:33:46.947

that same payment period. or period of enrollment as long.

00:33:46.947 --> 00:33:50.587

as before they were supposed to return.

00:33:50.587 --> 00:33:54.727

They provide this change in writing, and.

00:33:54.727 --> 00:33:58.647

that this later module that they've changed their attendance too.

00:33:58.647 --> 00:33:58.647

00:33:59.297 --> 00:34:01.987

Still meets the timeframes outlined.

00:34:02.807 --> 00:34:06.637

In our regulations, again for standard and non standard term.

00:34:06.637 --> 00:34:10.157

programs, not subscription based that later module.

00:34:10.157 --> 00:34:13.297

can be no later than 45 calendar days after.

00:34:13.297 --> 00:34:16.417

the mod that the students ceased attending an.

00:34:16.417 --> 00:34:19.607

for non term and subscription based they.

00:34:19.607 --> 00:34:22.697

must be able to resume attendance no later than.

00:34:22.697 --> 00:34:26.957

60 calendar days after they ceased attendance.

00:34:26.957 --> 00:34:26.957

00:34:27.907 --> 00:34:31.137

And you can see here again on the chart some of the changes.

00:34:31.137 --> 00:34:34.577

between our current regulations and new regulations.

00:34:34.577 --> 00:34:37.657

to get seeing how standard term programs.

00:34:37.657 --> 00:34:40.757

now have some time frame thresholds in.

00:34:40.757 --> 00:34:43.837

place. The modification for non.

00:34:43.837 --> 00:34:47.017

term from 45 to 60 calendar days and of course.

00:34:47.017 --> 00:34:50.037

now specifically addressing subscription.

00:34:50.037 --> 00:34:53.567

based programs. And as Aaron mentioned and will.

00:34:53.567 --> 00:34:56.697

continue to mention at times we.

00:34:56.697 --> 00:34:59.837

are going to have a future webinar

00:34:59.837 --> 00:34:59.837

00:34:59.917 --> 00:35:03.417

I believe May 10th that will address.

00:35:03.417 --> 00:35:06.467

specific issues around subscription.

00:35:06.467 --> 00:35:08.037

based programs.

00:35:09.987 --> 00:35:13.577

And now let's talk a little bit about withdrawal exemptions.

00:35:13.577 --> 00:35:16.737

This has been a very key topic within our new.

00:35:16.737 --> 00:35:20.157

regulations that have garnered some discussion.

00:35:20.157 --> 00:35:23.697

among institutions in questions being.

00:35:23.697 --> 00:35:26.917

raised. So we want to make sure that we walk through this.

00:35:26.917 --> 00:35:30.477

area carefully with our schools in today's webinar

00:35:30.477 --> 00:35:30.477

00:35:31.567 --> 00:35:34.727

One particular exemption which talks about students that.

00:35:34.727 --> 00:35:38.047

graduate from a program for completing.

00:35:38.047 --> 00:35:41.077

all the hours or days in their scheduled.

00:35:41.077 --> 00:35:44.487

period, applies to all programs.

00:35:44.487 --> 00:35:48.027

and I want to stress that so if you have a student.

00:35:48.027 --> 00:35:51.107

who completes all the requirements for graduation.

00:35:51.107 --> 00:35:54.567

from his or her program before they completely actually.

00:35:54.567 --> 00:35:58.087

complete the days or hours in the period.

00:35:58.087 --> 00:36:01.657

that they were scheduled to complete that student.

00:36:01.657 --> 00:36:01.657

00:36:02.087 --> 00:36:05.577

Is not considered a withdrawn student, no.

00:36:05.577 --> 00:36:09.157

R2T4 would have to be performed for that particular.

00:36:09.157 --> 00:36:12.477

student this particular graduation.

00:36:12.477 --> 00:36:15.897

exemption again applies to all programs.

00:36:15.897 --> 00:36:18.977

regardless of whether it has modules.

00:36:18.977 --> 00:36:22.177

or not, and I stress that because some of the exemptions we're going to talk.

00:36:22.177 --> 00:36:25.987

about do focus on programs with modules.

00:36:25.987 --> 00:36:27.367

so just keep that in mind.

00:36:28.287 --> 00:36:28.727

Now.

00:36:29.637 --> 00:36:32.907

When we're talking about withdrawal.

00:36:32.907 --> 00:36:36.347

exemptions for programs with modules.

00:36:36.347 --> 00:36:39.827

there's a couple of areas to discuss in a.

00:36:39.827 --> 00:36:43.407

program offered in modules. A student is not considered.

00:36:43.407 --> 00:36:47.027

to have withdrawn if they successfully.

00:36:47.027 --> 00:36:50.367

complete one module then.

00:36:50.367 --> 00:36:53.917

includes 49% or more of the number of days.

00:36:53.917 --> 00:36:55.077

in the payment period.

00:36:55.797 --> 00:36:59.067

When we're looking at the overall number of days in the payment period.

00:36:59.067 --> 00:37:02.337

you do exclude scheduled breaks of five.

00:37:02.337 --> 00:37:05.687

or more consecutive days and all the days between modules.

00:37:05.687 --> 00:37:05.687

00:37:06.467 --> 00:37:09.827

Now when we're talking about this 49%.

00:37:09.827 --> 00:37:13.237

please note that the 49% may not.

00:37:13.237 --> 00:37:16.617

be rounded up, so if it comes out to be 48.7%.

00:37:16.617 --> 00:37:19.747

it is below 49.

00:37:19.747 --> 00:37:23.337

in. The student does not meet this particular.

00:37:23.337 --> 00:37:26.487

withdrawal exemption. Also the 49.

00:37:26.487 --> 00:37:29.557

that we're talking about is based on the number of.

00:37:29.557 --> 00:37:32.837

days in the overall payment period, not 49%.

00:37:32.837 --> 00:37:36.337

of only the modules the student was enrolled in.

00:37:36.337 --> 00:37:36.337

00:37:36.897 --> 00:37:40.307

And finally, remember I mentioned successfully.

00:37:40.307 --> 00:37:43.907

completes for a successful completion means.

00:37:43.907 --> 00:37:47.247

that the student has actually earned a passing.

00:37:47.247 --> 00:37:50.507

grade within that particular module an

00:37:50.507 --> 00:37:53.327

earned F is not a passing grade.

00:37:56.097 --> 00:37:59.247

Another withdrawal exemption still tied to the number of.

00:37:59.247 --> 00:38:02.457

days in modules is a student would not.

00:38:02.457 --> 00:38:05.667

be considered withdrawn if they successfully complete.

00:38:05.667 --> 00:38:09.257

a combination of modules that when combined.

00:38:09.257 --> 00:38:12.507

contain the 49% or more of.

00:38:12.507 --> 00:38:15.827

the number of days in the payment period, excluding.

00:38:15.827 --> 00:38:19.467

the requisite number of days. You can exclude again.

00:38:19.467 --> 00:38:22.727

that 49% can't be rounded up, it's still based.

00:38:22.727 --> 00:38:26.267

on the overall number of days in the payment period. An successful.

00:38:26.267 --> 00:38:27.357

completion means.

00:38:27.407 --> 00:38:29.237

Earning a passing grade.

00:38:31.147 --> 00:38:32.277

And finally.

00:38:32.907 --> 00:38:36.317

The last withdrawal exemption for programs with modules.

00:38:36.317 --> 00:38:39.667

is when a student successfully completes.

00:38:39.667 --> 00:38:44.337

the course work equal to or greater than the course work required .

00:38:44.337 --> 00:38:48.837

for the institutions definition of 1/2 time student.

00:38:48.837 --> 00:38:52.127

Again, when we stay successful.

00:38:52.127 --> 00:38:55.157

completion, we mean that the student has actually.

00:38:55.157 --> 00:38:58.667

earned passing grades in enough credits.

00:38:58.667 --> 00:39:02.527

to qualify for halftime. Remember half time enrollment.

00:39:02.527 --> 00:39:05.537

is at least half the workload of the applicable.

00:39:05.537 --> 00:39:07.027

minimum requirements.

00:39:07.077 --> 00:39:10.507

Outlined in the definition of a full time student.

00:39:10.507 --> 00:39:10.507

00:39:12.757 --> 00:39:15.967

So here you can see in our comparison.

00:39:15.967 --> 00:39:18.977

chart between current regulations and new regulations.

00:39:18.977 --> 00:39:22.067

This is definitely adding benefits to.

00:39:22.067 --> 00:39:25.187

our students in schools when working with in.

00:39:25.187 --> 00:39:28.467

the R2T4 calculation, because currently there are no.

00:39:31.427 --> 00:39:34.867

These areas these additional withdrawal.

00:39:34.867 --> 00:39:38.137

exemption considerations are new within our rules.

00:39:38.137 --> 00:39:41.267

and so to help better understand some of.

00:39:41.267 --> 00:39:45.607

what we just talked about, let's go over a few examples.

00:39:45.607 --> 00:39:49.447

One of the things to remember.

00:39:49.447 --> 00:39:53.637

and what we try to do when we introduced students.

00:39:53.637 --> 00:39:56.647

within programs with modules.

00:39:56.647 --> 00:40:00.047

and the issue of whether or not they were withdrawn.

00:40:00.047 --> 00:40:04.137

We developed a series of questions to help our institutions.

00:40:04.137 --> 00:40:04.137

00:40:04.187 --> 00:40:07.217

Determine whether or not a student had actually withdrawn when.

00:40:07.217 --> 00:40:10.517

enrolled in modules for this presentation.

00:40:10.517 --> 00:40:14.237

we have expanded those questions to assist our schools.

00:40:14.237 --> 00:40:17.427

to address some of these new areas in.

00:40:17.427 --> 00:40:20.837

our new regulations. So instead of three questions.

00:40:20.837 --> 00:40:24.077

we now have five questions that we potentially.

00:40:24.077 --> 00:40:27.137

would ask ourselves to see if a student has withdrawn.

00:40:27.137 --> 00:40:30.367

did the students cease to attend or failed?

00:40:30.367 --> 00:40:33.457

to begin attendance in the scheduled course that was?

00:40:33.457 --> 00:40:36.857

included in the calculation of the students Title 4 awards?

00:40:36.857 --> 00:40:36.857

00:40:37.317 --> 00:40:40.707

If the answer is yes, we go to question 2.

00:40:40.707 --> 00:40:44.067

When the student sees to attend or failed to be begin.

00:40:44.067 --> 00:40:46.767

attendance, were they attending other courses?

00:40:47.347 --> 00:40:48.577

In the same period.

00:40:49.177 --> 00:40:52.237

If the answer is no, we go to question 3.

00:40:52.237 --> 00:40:52.237

00:40:53.027 --> 00:40:56.217

When the student sees to attend or failed to begin attendance, did.

00:40:56.217 --> 00:40:59.307

the student complete all the requirements for graduation? So there.

00:40:59.307 --> 00:41:02.987

you can see us focusing on one of the new exemption criteria.

00:41:02.987 --> 00:41:06.147

If the answer is no, we go to question.

00:41:06.147 --> 00:41:06.957

4.

00:41:07.647 --> 00:41:11.887

When the student ceased to attend or failed to begin attendance, did they successfully complete?

00:41:11.887 --> 00:41:11.887

00:41:12.527 --> 00:41:15.707

Modules or combination of modules that contain 49%.

00:41:15.707 --> 00:41:19.207

or more of the number of days in the payment period, or.

00:41:19.207 --> 00:41:22.327

did they successfully complete coursework equal to?

00:41:22.327 --> 00:41:25.437

half time student enrollment status?

00:41:25.437 --> 00:41:25.437

00:41:26.047 --> 00:41:29.187

If the answer is no, the last question question.

00:41:29.187 --> 00:41:30.017

5.

00:41:30.637 --> 00:41:33.927

As did the student confirm attendance in a later.

00:41:33.927 --> 00:41:37.167

module, talking about that written confirmation process.

00:41:37.167 --> 00:41:40.517

we talked about. And of course here focusing on the new.

00:41:40.517 --> 00:41:43.737

time frame thresholds, 45 days for standard.

00:41:43.737 --> 00:41:47.327

or nonstandard, 60 days for non term or subscription.

00:41:47.327 --> 00:41:50.867

based if the answer is no and there is no written confirmation.

00:41:50.867 --> 00:41:54.247

then the student is a withdrawn student.

00:41:54.247 --> 00:41:55.647

for title 4 purposes.

00:41:57.017 --> 00:42:00.067

So a couple of examples within our.

00:42:00.067 --> 00:42:03.107

withdrawal exemption criteria here.

00:42:03.107 --> 00:42:06.497

we have an example of a student who completes all the requirements.

00:42:06.497 --> 00:42:09.767

for graduation prior to completing all of the hours.

00:42:09.767 --> 00:42:13.507

they were scheduled to attend. And as this particular.

00:42:13.507 --> 00:42:16.667

exemption can impact any program, remember.

00:42:16.667 --> 00:42:19.877

it doesn't have to be one that's defined with modules we chose.

00:42:19.877 --> 00:42:22.887

to have o'clock hour example this particular.

00:42:22.887 --> 00:42:26.597

student enrolled in a 900 clock hour program with two.

00:42:26.597 --> 00:42:26.597

00:42:26.767 --> 00:42:29.817

450 hour payment periods partway through.

00:42:29.817 --> 00:42:32.997

the 2nd 450 payment period at.

00:42:32.997 --> 00:42:36.057

our 300 within that payment.

00:42:36.057 --> 00:42:39.697

period, the student completed all of the academic requirements.

00:42:39.697 --> 00:42:42.707

to graduate and when they actually.

00:42:42.707 --> 00:42:45.907

graduated the program. They only completed a total.

00:42:45.907 --> 00:42:49.417

of 750 hours in the program.

00:42:49.417 --> 00:42:52.997

Now looking at our new withdrawal exemption criteria.

00:42:52.997 --> 00:42:56.337

even though they have not completed all of the hours in the payment period.

00:42:56.337 --> 00:42:58.987

since the student has graduated.

00:42:59.677 --> 00:43:03.687

The student is not considered withdrawn for R2T4 purposes.

00:43:03.687 --> 00:43:03.687

00:43:05.107 --> 00:43:08.217

Now, one thing to keep in mind when we talk about this and this is.

00:43:08.217 --> 00:43:11.517

coming up directly because of our withdrawal exemption around.

00:43:11.517 --> 00:43:15.167

students that graduate without completing all the hours.

00:43:15.167 --> 00:43:18.657

or days in their program for clock hour programs.

00:43:18.657 --> 00:43:21.877

only we want to stress policy that.

00:43:21.877 --> 00:43:25.117

states that if a student graduates without successfully.

00:43:25.117 --> 00:43:28.567

completing all of the hours in the clock hour program.

00:43:28.567 --> 00:43:28.567

00:43:29.137 --> 00:43:32.197

The school must repro rate. The amount of title.

00:43:32.197 --> 00:43:35.637

4 aid and only pay the student for the hours successfully.

00:43:35.637 --> 00:43:38.777

completed again. I need to stress that this.

00:43:38.777 --> 00:43:42.077

requirement and is only for clock hour programs.

00:43:42.077 --> 00:43:45.137

In our example, since the student left after.

00:43:45.137 --> 00:43:48.297

300 hours in the second payment period, the school would have.

00:43:48.297 --> 00:43:51.477

to prorate all title for Aid and. That includes direct.

00:43:51.477 --> 00:43:54.537

loans and only pay the student for a total.

00:43:54.537 --> 00:43:57.637

of 750 hours instead of paying.

00:43:57.637 --> 00:43:59.437

them for 900.

00:43:59.677 --> 00:44:02.827

This is unique to clock hour programs, in part because.

00:44:02.827 --> 00:44:06.207

of how clock hours are defined, remember.

00:44:06.207 --> 00:44:09.827

that clock hours are a specific unit of time.

00:44:09.827 --> 00:44:12.947

and the title 4 that is provided to our students.

00:44:12.947 --> 00:44:16.027

are based in part on how the student progresses.

00:44:16.027 --> 00:44:19.037

through those actual units of time and.

00:44:19.037 --> 00:44:22.147

they have to actually successfully complete those.

00:44:22.147 --> 00:44:25.277

hours to progress throughout the program.

00:44:25.277 --> 00:44:28.667

Now I do want to point out at the bottom of this slide.

00:44:28.667 --> 00:44:29.727

that graduating.

00:44:29.777 --> 00:44:32.867

Early from any program without completing.

00:44:32.867 --> 00:44:35.977

all the days or hours should not be a common.

00:44:35.977 --> 00:44:39.327

occurrence. If we do see a significant.

00:44:39.327 --> 00:44:42.647

number of your students continually graduating early.

00:44:42.647 --> 00:44:46.087

compliance could call into question what is.

00:44:46.087 --> 00:44:49.287

the true length of your program for title 4.

00:44:49.287 --> 00:44:52.547

purposes. So please be careful this could become.

00:44:52.547 --> 00:44:55.587

a program eligibility issue if most of your.

00:44:55.587 --> 00:44:58.827

students are not going the full length of your program.

00:44:58.827 --> 00:44:58.827

00:45:01.007 --> 00:45:04.127

Couple of other examples to look at when we talk about these.

00:45:04.127 --> 00:45:07.167

new exemptions. What about a situation where?

00:45:07.167 --> 00:45:10.357

we have one module that includes 49%?

00:45:10.357 --> 00:45:13.677

or more of the days in the payment period? So here we have an example.

00:45:13.677 --> 00:45:17.187

of a student that enrolls and nine credit hours.

00:45:17.187 --> 00:45:20.767

of semester long course work in three.

00:45:20.767 --> 00:45:24.957

hours. In module one the overall semester.

00:45:24.957 --> 00:45:28.297

For our purposes of determining withdrawal exemption.

00:45:28.297 --> 00:45:30.067

as 105 days.

00:45:30.277 --> 00:45:33.667

Remember, the school would have backed out and he's scheduled.

00:45:33.667 --> 00:45:36.987

breaks of five or more days and all days between modules.

00:45:36.987 --> 00:45:36.987

00:45:37.777 --> 00:45:41.377

Module one consists of 52 days the student.

00:45:41.377 --> 00:45:45.137

t earns a ”B” in module one and then withdraws.

00:45:45.137 --> 00:45:48.287

after completing module one from the entire semester.

00:45:48.287 --> 00:45:51.547

So the question the school asked is R2.

00:45:51.547 --> 00:45:53.267

T4 required.

00:45:53.927 --> 00:45:57.137

We take the number of days in the module 52 that the student.

00:45:57.137 --> 00:46:00.297

was enrolled in divided by 105, which is the overall.

00:46:00.297 --> 00:46:03.317

days in the payment period and that equals 49.5 %.

00:46:03.317 --> 00:46:07.377

this case, since the student successfully.

00:46:07.377 --> 00:46:10.877

completed remember, they gotta be in Module 1.

00:46:10.877 --> 00:46:14.087

e. They successfully completed a module that includes.

00:46:14.087 --> 00:46:17.097

49% or more of the number of days in.

00:46:17.097 --> 00:46:20.317

the overall payment period. R 2T4 is.

00:46:20.317 --> 00:46:21.887

not required.

00:46:23.197 --> 00:46:26.307

Let's look at another example at the bottom of the slide student.

00:46:26.307 --> 00:46:29.767

enrolls again in nine hours that are semester.

00:46:29.767 --> 00:46:33.147

long course work, three hours in module 1.

00:46:33.147 --> 00:46:36.187

again the overall semester for this exemption.

00:46:36.187 --> 00:46:39.267

formula is 105 days, but in this case.

00:46:39.267 --> 00:46:42.467

module one is only 51 days, remember?

00:46:42.467 --> 00:46:46.167

a lot of you have modules of a lot of varying lengths.

00:46:46.167 --> 00:46:49.497

so we have to be careful to know how many days actually.

00:46:49.497 --> 00:46:52.697

exist within our different modules the student earns.

00:46:52.697 --> 00:46:55.787

a ”B” in module one and then completely withdraws from.

00:46:55.787 --> 00:46:56.667

the entire.

00:46:56.707 --> 00:46:59.757

semester again is R2T4 required.

00:46:59.757 --> 00:47:02.917

Well, in this case 51 / 100.

00:47:02.917 --> 00:47:06.357

= 48.5%.

00:47:06.357 --> 00:47:06.357

00:47:07.277 --> 00:47:10.547

Now the student in this case did not.

00:47:10.547 --> 00:47:13.637

successfully complete a module. Yeah, they got a “B”, but.

00:47:13.637 --> 00:47:17.017

they didn't successfully complete a module that includes 49%.

00:47:17.017 --> 00:47:20.117

or more of the number of days in the overall payment.

00:47:20.117 --> 00:47:23.357

period for those paying attention, remember.

00:47:23.357 --> 00:47:26.627

what I mentioned earlier that 49%?

00:47:26.627 --> 00:47:30.307

you cannot round up too, so because it was below.

00:47:30.307 --> 00:47:33.377

that 48.5 that is below.

00:47:33.377 --> 00:47:36.437

49% and therefore R 2T4.

00:47:36.437 --> 00:47:39.247

is required. The student would not meet.

00:47:39.297 --> 00:47:42.507

The withdrawal exemption in this case here.

00:47:42.507 --> 00:47:46.027

we have another example of a student enrolled in nine hours of.

00:47:46.027 --> 00:47:49.487

semester long course work. Three hours in module one again.

00:47:49.487 --> 00:47:52.987

the overall semester days is calculated for this exemption.

00:47:52.987 --> 00:47:56.177

is 105 days, with Module 1 being.

00:47:56.177 --> 00:47:59.307

52 days. Now they complete module.

00:47:59.307 --> 00:48:02.857

one, but they do so after earning a hard earned.

00:48:02.857 --> 00:48:06.247

F. So they have an earned F at the end of module.

00:48:06.247 --> 00:48:09.187

one and then the student completely withdraws.

00:48:09.567 --> 00:48:13.017

Is R2T4 required the number of days?

00:48:13.017 --> 00:48:16.197

52 / 105 is equal to or greater?

00:48:16.197 --> 00:48:19.937

than 49%, however remember.

00:48:19.937 --> 00:48:23.817

in this particular case, the student did not successfully.

00:48:23.817 --> 00:48:27.057

complete a module they did not earn a passing.

00:48:27.057 --> 00:48:30.357

grade in there for the exemption would not apply.

00:48:30.357 --> 00:48:33.427

in R2T4 is required.

00:48:33.427 --> 00:48:33.427

00:48:35.017 --> 00:48:38.157

Here we're going to look at some examples around combination.

00:48:38.157 --> 00:48:41.967

of modules. A student enrolls in four modules.

00:48:41.967 --> 00:48:45.287

taking 3 credits in modules one and three.

00:48:45.287 --> 00:48:48.707

and two credits in modules two and four I.

00:48:48.707 --> 00:48:50.957

do want to note I had to.

00:48:51.607 --> 00:48:54.677

When we were trying to address this, we were trying to make sure.

00:48:54.677 --> 00:48:57.717

that we were looking at different scenarios as.

00:48:57.717 --> 00:49:00.917

many as we could within the time frame that we had to try.

00:49:00.917 --> 00:49:04.137

to showcase some of the different.

00:49:04.137 --> 00:49:07.477

situations that could arise, the overall.

00:49:07.477 --> 00:49:11.127

term in this particular case consists of 80 days.

00:49:11.127 --> 00:49:14.617

minus the days. That is school is able to back out.

00:49:14.617 --> 00:49:14.617

00:49:15.487 --> 00:49:18.657

And each module consists of 20 days the.

00:49:18.657 --> 00:49:22.137

student earns a ”D” and a “C” 00:49:22.137 --> 00:49:25.737

in Module 2 and then completely withdraws.

00:49:25.737 --> 00:49:29.137

from the entire term. Is R2T4 required?

00:49:29.137 --> 00:49:32.317

If we look at the modules that the student?

00:49:32.317 --> 00:49:35.877

has successfully completed, we look at 40.

00:49:35.877 --> 00:49:38.957

80 = 50%.

00:49:38.957 --> 00:49:42.157

Since the student did successfully complete remember.

00:49:42.157 --> 00:49:45.287

we did have passing grades in both module.

00:49:45.287 --> 00:49:46.297

one and two.

00:49:46.857 --> 00:49:50.387

The combination of modules include days.

00:49:50.387 --> 00:49:53.667

that are 49% or more of the overall number of days.

00:49:53.667 --> 00:49:56.697

in the overall payment period, therefore, R2.

00:49:56.697 --> 00:49:59.147

T4 is not required.

00:50:00.947 --> 00:50:04.117

The next example is a student enrolls in five modules.

00:50:04.117 --> 00:50:07.217

taking 3 credits in modules one and three.

00:50:07.217 --> 00:50:10.957

and two credits in modules 2, four and five.

00:50:10.957 --> 00:50:14.157

In this particular case, the overall term as.

00:50:14.157 --> 00:50:16.457

defined by the school subtracting out the.

00:50:17.097 --> 00:50:19.997

Requisite number of days is 100 days.

00:50:20.787 --> 00:50:23.847

All the modules or 20 days long the student.

00:50:23.847 --> 00:50:27.107

earned to be in module one for three credits a ”C”.

00:50:27.107 --> 00:50:30.367

in Module 2 for two credits and then the student.

00:50:30.367 --> 00:50:33.847

completely withdrew from the entire term is.

00:50:33.847 --> 00:50:36.947

R2T4 required? Well, if we look at.

00:50:36.947 --> 00:50:40.047

the number of days in the modules, the student successfully.

00:50:40.047 --> 00:50:43.737

completed, we have 40 / 100 which is 40%.

00:50:43.737 --> 00:50:47.357

The student did not successfully complete a combination.

00:50:47.357 --> 00:50:50.627

of modules that include at least 49% or more.

00:50:50.627 --> 00:50:50.627

00:50:50.787 --> 00:50:54.177

And we also have to remember, nor did they complete halftime.

00:50:54.177 --> 00:50:57.357

coursework. I have to bring that up because, remember.

00:50:57.357 --> 00:51:00.377

they only completed five hours between modules.

00:51:00.377 --> 00:51:03.637

one and two. Therefore they don't meet any.

00:51:03.637 --> 00:51:06.777

of the withdrawal exemptions and therefore R 2T4.

00:51:06.777 --> 00:51:08.337

is required.

00:51:10.657 --> 00:51:13.987

A student enrolls in three modules taking 6 credits.

00:51:13.987 --> 00:51:17.247

in module one and three credits in Module 2.

00:51:17.247 --> 00:51:20.687

o and three credits in Module 3 the overall.

00:51:20.687 --> 00:51:24.197

term for the withdrawal exemption calculation.

00:51:24.197 --> 00:51:27.207

is 100 days minus the requisite number.

00:51:27.207 --> 00:51:30.357

of days they can back out. Module one is 40.

00:51:30.357 --> 00:51:33.547

days, Module 2 is 25 days in Module, 3 is 35.

00:51:33.547 --> 00:51:36.957

days. We have this example in part.

00:51:36.957 --> 00:51:39.987

Remember, a lot of your modules may have different lengths.

00:51:39.987 --> 00:51:42.827

of time, and that's perfectly fine. You just have to be careful.

00:51:42.987 --> 00:51:46.097

To properly calculate the number of days the.

00:51:46.097 --> 00:51:49.297

student earns a ”C” and an F in.

00:51:49.297 --> 00:51:52.647

module one and they also earn another F.

00:51:52.647 --> 00:51:55.717

in module 2, the student then withdraws from.

00:51:55.717 --> 00:51:58.757

the entire term after module 2 is R2.

00:51:58.757 --> 00:52:00.087

T4 required.

00:52:00.917 --> 00:52:03.987

This student did not successfully complete.

00:52:03.987 --> 00:52:05.337

a combination of.

00:52:06.347 --> 00:52:09.377

Modules that are 49% or more remember?

00:52:09.377 --> 00:52:12.467

the student did not successfully complete Module 2 'cause he got.

00:52:12.467 --> 00:52:15.477

an earned F. Therefore we can only look at the Days In module.

00:52:15.477 --> 00:52:18.557

one or module one is 40 days 40 /100.

00:52:18.557 --> 00:52:21.667

is 40%. That's the less than 49%.

00:52:21.667 --> 00:52:24.747

Also remember they did not.

00:52:24.747 --> 00:52:28.327

complete halftime coursework, they only completed.

00:52:28.327 --> 00:52:31.557

one course in module one with a passing grade.

00:52:31.557 --> 00:52:34.797

for three credits. Therefore R 2T4.

00:52:34.797 --> 00:52:36.807

is required.

00:52:39.177 --> 00:52:43.587

And finally, looking at halftime completion examples.

00:52:43.587 --> 00:52:46.967

a student enrolls and six credit hours of semester long course.

00:52:46.967 --> 00:52:50.127

work and six credit hours in Module 1.

00:52:50.127 --> 00:52:53.747

The overall semester for the exemption.

00:52:53.747 --> 00:52:57.037

formula is 105 days minus the requisite.

00:52:57.037 --> 00:53:00.187

number of days and module one consists of 45.

00:53:00.187 --> 00:53:03.627

days. The student earns and “B” and an “A”.

00:53:03.627 --> 00:53:06.867

in module one, then completely withdraws.

00:53:06.867 --> 00:53:08.717

Is R2T4 required?

00:53:09.767 --> 00:53:12.877

Even though the number of days completed in mod one.

00:53:12.877 --> 00:53:15.977

is below 49 percent, 45 days out of.

00:53:15.977 --> 00:53:20.017

105 is only 42% remember.

00:53:20.017 --> 00:53:23.637

the student did successfully complete halftime coursework in.

00:53:23.637 --> 00:53:26.817

module one. They did successfully complete 6.

00:53:26.817 --> 00:53:30.357

x hours. Therefore they meet the halftime.

00:53:30.357 --> 00:53:33.617

withdrawal exemption and R2T4 is.

00:53:33.617 --> 00:53:35.057

not required.

00:53:35.877 --> 00:53:39.297

The example below has a similar situation except.

00:53:39.297 --> 00:53:42.387

in that situation again overall payment period of.

00:53:42.387 --> 00:53:45.727

105 days in the module is 45 days.

00:53:45.727 --> 00:53:48.997

Note that the student earned a ”B” and.

00:53:48.997 --> 00:53:52.627

earned F in module one so.

00:53:52.627 --> 00:53:56.217

and then completely withdraws in this case.

00:53:56.217 --> 00:53:59.347

not only did they not successfully complete a module.

00:53:59.347 --> 00:54:02.767

that includes 49% or more of the number of days.

00:54:02.767 --> 00:54:05.627

again, that's only was only 42%.

00:54:05.887 --> 00:54:09.057

45 / 105 But they also.

00:54:09.057 --> 00:54:12.077

did not successfully complete halftime coursework.

00:54:12.077 --> 00:54:15.117

They only earned a passing grade in one course.

00:54:15.117 --> 00:54:18.197

for three hours. Therefore, in this.

00:54:18.197 --> 00:54:21.277

case, R2T4 is required.

00:54:21.277 --> 00:54:21.277

00:54:22.687 --> 00:54:25.757

And our final examples focus on a student enrolled.

00:54:25.757 --> 00:54:29.387

in five modules, taking 3 credits in each module.

00:54:29.387 --> 00:54:32.947

The overall term consists of 100 days.

00:54:32.947 --> 00:54:36.307

for this withdrawal exemption formula backing.

00:54:36.307 --> 00:54:39.627

out the requisite number of days of breaks and days between.

00:54:39.627 --> 00:54:42.917

modules and each module consists of 20 days.

00:54:42.917 --> 00:54:42.917

00:54:43.607 --> 00:54:46.817

The student earned a “B” in module one. They earned an F.

00:54:46.817 --> 00:54:49.947

in module two. They earned a ”C” in module.

00:54:49.947 --> 00:54:53.387

3 an after module three they completely withdraw is.

00:54:53.387 --> 00:54:56.647

R2T4 required even though the number.

00:54:56.647 --> 00:54:59.777

of days successfully completed in mods. One and three those are.

00:54:59.777 --> 00:55:03.267

the only ones they could factor in, because remember they earned an F in mod.

00:55:03.267 --> 00:55:05.847

2 is below 49%.

00:55:06.437 --> 00:55:09.497

Mods, one and three only equate to 40% of.

00:55:09.497 --> 00:55:12.537

the number of days, however, with modules.

00:55:12.537 --> 00:55:16.237

one and three, they did successfully complete halftime Courseworks 6.

00:55:16.237 --> 00:55:19.517

hours and therefore R 2T4 is not.

00:55:19.517 --> 00:55:22.597

required. Just trying to give a little example of what May.

00:55:22.597 --> 00:55:25.637

happen when they enroll in multiple modules and fail some.

00:55:25.637 --> 00:55:27.647

courses past some courses, etc.

00:55:29.567 --> 00:55:32.757

And finally, a student that enrolls in five modules 3.

00:55:32.757 --> 00:55:36.037

credits in each module. Again the overall payment.

00:55:36.037 --> 00:55:39.177

period length is 100 days, with each module being 20.

00:55:39.177 --> 00:55:42.617

days. This particular student earns an “F” in module.

00:55:42.617 --> 00:55:46.037

and a “C” in Module 2 and then withdraws.

00:55:46.037 --> 00:55:49.097

from the entire term is R2T4 required.

00:55:49.097 --> 00:55:52.247

since the student did not successfully complete.

00:55:52.247 --> 00:55:55.527

modules with 49% or more of the number of days.

00:55:55.527 --> 00:55:58.867

in the overall payment period, they only completed 20%.

00:55:58.867 --> 00:55:58.867

00:55:59.457 --> 00:56:02.627

They were scheduled. Remember to enroll in all 5.

00:56:02.627 --> 00:56:05.687

modules with three credits in each. They also.

00:56:05.687 --> 00:56:09.147

did not successfully complete halftime coursework in modules.

00:56:09.147 --> 00:56:12.607

one and two remember. They only successfully completed.

00:56:12.607 --> 00:56:15.667

or passed one course in Module 2 for.

00:56:15.667 --> 00:56:19.227

a total of three hours. Therefore, they do not meet any of the exemptions.

00:56:19.227 --> 00:56:22.427

and R2T4 is required. I do want to point.

00:56:22.427 --> 00:56:25.627

out here in this particular example if the student was only.

00:56:25.627 --> 00:56:28.767

enrolled in module one and Module 2.

00:56:28.767 --> 00:56:32.327

and they got an F in module one and they got “C”a in Module 2.

00:56:32.327 --> 00:56:32.327

00:56:32.487 --> 00:56:35.957

And then of course they stopped attending because their modules were done.

00:56:35.957 --> 00:56:39.017

for that payment period, even though they don't meet any.

00:56:39.017 --> 00:56:42.217

withdrawal exemptions here, that is not a withdrawal for Title IV

00:56:42.217 --> 00:56:45.857

for purposes, these are simply additional exemptions.

00:56:45.857 --> 00:56:48.997

to consider to determine if a student is withdrawn student.

00:56:48.997 --> 00:56:52.077

If the student completes all of the.

00:56:52.077 --> 00:56:55.217

days they were scheduled to attend, let's say one.

00:56:55.217 --> 00:56:55.947

module.

00:56:57.487 --> 00:57:00.837

And then they complete that one module and that payment.

00:57:00.837 --> 00:57:03.907

Here they are not a withdrawal for title for purposes we.

00:57:03.907 --> 00:57:07.927

did not change that which is currently in existence.

00:57:07.927 --> 00:57:11.417

and will continue to go forward. Couple of reminders.

00:57:11.417 --> 00:57:14.557

and we talk about withdrawal exemptions. Remember that?

00:57:14.557 --> 00:57:17.657

these requirements for withdrawal exemptions when you're trying to.

00:57:17.657 --> 00:57:17.657

00:57:20.467 --> 00:57:23.537

They meet the 40 number of days or half time completion, etc.

00:57:23.537 --> 00:57:23.537

00:57:24.347 --> 00:57:27.737

Are used solely to determine if the student is considered withdrawn.

00:57:27.737 --> 00:57:30.977

for R2T4 purposes if.

00:57:30.977 --> 00:57:34.177

a student does not meet these withdrawal exemptions.

00:57:34.177 --> 00:57:37.197

and they are considered withdrawn, you are simply going to follow the.

00:57:37.197 --> 00:57:40.447

normal R2T4 requirements, such as did the student earn.

00:57:40.447 --> 00:57:43.697

more than 60%? Is there post withdrawal disbursements?

00:57:43.697 --> 00:57:46.857

etc right as soon as?

00:57:46.857 --> 00:57:50.027

you determine that the student is withdrawn student?

00:57:50.027 --> 00:57:53.387

you don't factor or focus on the 49%.

00:57:53.387 --> 00:57:56.097

the 49 percent is only used to determine.

00:57:56.387 --> 00:57:59.457

The student is exempt or not if they are not exempt.

00:57:59.457 --> 00:58:02.607

We then go back to the normal R2T4 rules, so I just.

00:58:02.607 --> 00:58:05.737

want to focus on and reminder schools because some.

00:58:05.737 --> 00:58:08.787

of them are confused with some of the questions were getting in.

00:58:08.787 --> 00:58:12.457

there, bringing in some of the withdrawal exemption criteria.

00:58:12.457 --> 00:58:16.377

and trying to also use that criteria.

00:58:16.377 --> 00:58:19.777

when doing an actual R 2T4 calculation.

00:58:19.777 --> 00:58:22.997

So just separate out those requirements and you'll be.

00:58:22.997 --> 00:58:26.567

fine. And again, as I mentioned at the bottom of the slide.

00:58:26.567 --> 00:58:26.567

00:58:26.817 --> 00:58:29.827

If the student does not meet the withdrawal exemptions, but.

00:58:29.827 --> 00:58:33.197

they do complete all the coursework they were scheduled to attend.

00:58:33.197 --> 00:58:36.327

even if they were only scheduled to attend one module, no.

00:58:36.327 --> 00:58:39.727

R2T4 is required since the student was only scheduled.

00:58:39.727 --> 00:58:43.127

to attend those particular days within.

00:58:43.127 --> 00:58:44.667

that payment period.

00:58:45.997 --> 00:58:49.087

And our last topic under R2T4 to focus on.

00:58:49.087 --> 00:58:49.527

is.

00:58:50.087 --> 00:58:54.117

Defining the number of days scheduled to complete in modules.

00:58:54.117 --> 00:58:54.117

00:58:54.947 --> 00:58:58.407

Our new regulations specifically indicates that a student.

00:58:58.407 --> 00:59:01.417

in a program offered in modules is scheduled to.

00:59:01.417 --> 00:59:04.577

complete the days in a module. If the students coursework.

00:59:04.577 --> 00:59:08.097

in that module was used to determine the amount.

00:59:08.097 --> 00:59:11.557

of the students eligibility for title 4 aid, we.

00:59:11.557 --> 00:59:14.637

have further define this to indicate that.

00:59:14.637 --> 00:59:17.967

a school will include the days in a module in.

00:59:17.967 --> 00:59:21.297

the denominator of the R2T4 calculation if.

00:59:21.297 --> 00:59:24.617

the following items can.

00:59:24.617 --> 00:59:25.317

be true.

00:59:25.607 --> 00:59:26.257

1.

00:59:27.347 --> 00:59:30.927

A student attended at least one day in the module.

00:59:30.927 --> 00:59:33.967

Anytime a student attends at least one day.

00:59:33.967 --> 00:59:37.027

in a module, those days in the module.

00:59:37.027 --> 00:59:40.417

will be factored in.

00:59:40.417 --> 00:59:43.427

to the R2T4 calculation specifically in.

00:59:43.427 --> 00:59:46.607

the denominator. When doing the calculation so.

00:59:46.607 --> 00:59:49.697

please keep that in mind. That's overreaching guidance.

00:59:49.697 --> 00:59:52.387

that we need to keep in mind or.

00:59:52.987 --> 00:59:56.007

This if the student did not attend at least one day in a.

00:59:56.007 --> 00:59:59.017

module, was the module included in.

00:59:59.017 --> 01:00:02.337

the institutions determination of the students title?

01:00:02.337 --> 01:00:03.417

for eligibility?

01:00:05.317 --> 01:00:08.807

There are two ways to determine if.

01:00:08.807 --> 01:00:11.977

the number of days that the student was scheduled to complete in.

01:00:11.977 --> 01:00:15.357

a module. For those where the student.

01:00:15.357 --> 01:00:18.687

did not attend. So if I obviously.

01:00:18.687 --> 01:00:21.867

as mentioned, I attend one day those days in the module.

01:00:21.867 --> 01:00:25.507

will be factored into the calculation. If I don't attend the module.

01:00:25.507 --> 01:00:28.807

those days would be included. If one of in.

01:00:28.807 --> 01:00:32.347

one of two ways to determine you can choose.

01:00:32.347 --> 01:00:35.337

to use the students enrollment schedule.

01:00:35.687 --> 01:00:39.177

Based on the module, there enrolled in at a fixed.

01:00:39.177 --> 01:00:43.077

point, this fixed date is optional.

01:00:43.077 --> 01:00:46.137

Now we have to stress that we've gotten that question a few times it.

01:00:46.137 --> 01:00:49.377

is optional to use a fixed date for.

01:00:49.377 --> 01:00:52.617

our purposes. We're affectionately calling this fixed point.

01:00:52.617 --> 01:00:54.757

an R2T4 freeze day.

01:00:55.677 --> 01:00:59.397

We're doing that in part to help differentiate it between other dates.

01:00:59.397 --> 01:01:02.467

We seem to have more and more dates coming up, and so we want to make.

01:01:02.467 --> 01:01:05.677

sure we understand that this R 2T4 freeze date.

01:01:05.677 --> 01:01:09.197

is specific to the R2T4 process if.

01:01:09.197 --> 01:01:12.697

you don't want to use the R2T4 freeze date.

01:01:12.697 --> 01:01:12.697

01:01:13.437 --> 01:01:16.457

That's fine if you don't. You are going to monitor the.

01:01:16.457 --> 01:01:19.757

changes in the students enrollment throughout.

01:01:19.757 --> 01:01:22.957

the period, right? There is no freeze.

01:01:22.957 --> 01:01:26.237

date. You were going to monitor that students.

01:01:26.237 --> 01:01:29.377

enrollment status throughout the payment period.

01:01:29.377 --> 01:01:32.387

which could go up or down depending upon.

01:01:32.387 --> 01:01:35.457

the student adding or dropping coursework, and it could cause the.

01:01:35.457 --> 01:01:38.887

number of days within the calculation to change.

01:01:38.887 --> 01:01:42.027

I will tell you now that there's no perfect way to do this.

01:01:42.027 --> 01:01:42.027

01:01:42.617 --> 01:01:45.637

There's pros and cons for both. Some of the examples you're.

01:01:45.637 --> 01:01:48.987

going to see it's going to appear to be more lenient one way and more restrictive.

01:01:48.987 --> 01:01:52.047

another, but then you'll see another example where the reverse is.

01:01:52.047 --> 01:01:55.267

true. So what works for your students in your programs?

01:01:55.267 --> 01:01:58.397

at your school if you choose to?

01:01:58.397 --> 01:02:01.997

use an R2T4 freeze date, which is again optional?

01:02:01.997 --> 01:02:01.997

01:02:02.997 --> 01:02:06.577

Subsequent enrollment fluctuations, typically.

01:02:06.577 --> 01:02:09.717

don't alter the number of days. Now I say typically because.

01:02:09.717 --> 01:02:12.747

we have to remember what I mentioned earlier and.

01:02:12.747 --> 01:02:14.777

in a key reminder is that.

01:02:15.637 --> 01:02:18.777

You will always include days in modules.

01:02:18.777 --> 01:02:22.007

in which the student attends at least one.

01:02:22.007 --> 01:02:25.477

day. So just keep that in mind. The R2 T4.

01:02:25.477 --> 01:02:28.577

freeze date can coincide with other dates census dates, pell recalculation dates. That makes it easy.

01:02:31.637 --> 01:02:35.067

or you can have it as a completely separate date.

01:02:35.067 --> 01:02:38.297

and just like power recalculation dates if you want to.

01:02:38.297 --> 01:02:41.897

you can have multiple R 2T4 freeze dates.

01:02:41.897 --> 01:02:44.957

covering multiple modules now one.

01:02:44.957 --> 01:02:45.897

thing I want to.

01:02:46.317 --> 01:02:50.247

Point out and we mentioned at the bottom of the slide. That's very important.

01:02:50.247 --> 01:02:50.247

01:02:51.057 --> 01:02:54.787

As an institution, you have to ensure that if you choose.

01:02:54.787 --> 01:02:57.967

to use an R2T4 freeze date forgiven payment period.

01:02:57.967 --> 01:03:01.607

or period of enrollment, that you're not going to establish this.

01:03:01.607 --> 01:03:04.687

freeze date to occur prior to.

01:03:04.687 --> 01:03:07.857

a time frame when most of your students enroll for classes.

01:03:07.857 --> 01:03:10.887

and what we mean by that is we don't want to.

01:03:10.887 --> 01:03:14.007

school specifically structuring their.

01:03:14.007 --> 01:03:17.057

freeze date in such a way that students are only enrolled.

01:03:17.057 --> 01:03:20.097

for instance, in a single module and then right after.

01:03:20.097 --> 01:03:21.067

the freeze day.

01:03:21.367 --> 01:03:24.657

The student enrolls in a whole bunch of other coursework and receives.

01:03:24.657 --> 01:03:28.207

a whole lot more title for aid with the intent.

01:03:28.207 --> 01:03:31.297

that maybe if the student does withdraw.

01:03:31.297 --> 01:03:34.577

the school would have an easier.

01:03:34.577 --> 01:03:37.977

time of doing an R2T4 calculation.

01:03:37.977 --> 01:03:41.417

or even have to do an R2T4 calculation so.

01:03:41.417 --> 01:03:44.597

we want to make sure that the schools are properly.

01:03:44.597 --> 01:03:47.617

implementing their freeze dates to capture when most.

01:03:47.617 --> 01:03:51.137

of their students are enrolling in coursework and.

01:03:51.137 --> 01:03:52.597

if compliance.

01:03:52.657 --> 01:03:55.987

In reviewing schools, policy is determined that the school.

01:03:55.987 --> 01:03:59.527

has been doing this in such a way to try to get around.

01:03:59.527 --> 01:04:02.647

or modify this R2T4 for.

01:04:02.647 --> 01:04:06.117

process because it is optional the compliance teams.

01:04:06.117 --> 01:04:09.867

could indicate to the school that they have to monitor.

01:04:09.867 --> 01:04:13.137

fluctuations throughout the payment period in the students.

01:04:13.137 --> 01:04:16.187

enrollment status and cannot use

01:04:16.187 --> 01:04:18.107

R2T4 freeze date.

01:04:19.727 --> 01:04:23.397

So you can see here our current regulations. Our guidance?

01:04:23.397 --> 01:04:26.607

has been that if a student is enrolled in future.

01:04:26.607 --> 01:04:29.717

modules but drops those future modules.

01:04:29.717 --> 01:04:32.737

while still attending other coursework.

01:04:32.737 --> 01:04:36.637

the schools have been able to exclude those future.

01:04:36.637 --> 01:04:40.007

modules and the days of those modules.

01:04:40.007 --> 01:04:43.457

from consideration. If the student completely withdraws later.

01:04:43.457 --> 01:04:46.797

that's being removed under new regs focusing.

01:04:46.797 --> 01:04:50.257

on the modules that are being used to determine.

01:04:50.257 --> 01:04:50.837

the students.

01:04:50.887 --> 01:04:54.217

Eligibility which as I mentioned also includes.

01:04:54.217 --> 01:04:57.527

modules where they attend at least one day.

01:04:57.527 --> 01:04:57.527

01:04:59.217 --> 01:05:02.227

So we have just a few examples here. We're going to focus on some.

01:05:02.227 --> 01:05:05.307

that are with R 2T4 freeze date.

01:05:05.307 --> 01:05:08.647

and some without an R2T4 freeze date, remember.

01:05:08.647 --> 01:05:11.667

all these examples are trying to determine whether.

01:05:11.667 --> 01:05:15.107

or not you have to include the days in particular modules.

01:05:15.107 --> 01:05:18.287

when calculating the denominator for the number of days.

01:05:18.287 --> 01:05:21.367

in R2T4. example, one is no R2.

01:05:21.367 --> 01:05:25.317

4 freeze date with A pell only recipient student.

01:05:25.317 --> 01:05:28.667

enrolls in a semester with two eight week modules, the.

01:05:28.667 --> 01:05:29.987

school uses one.

01:05:30.277 --> 01:05:33.507

The calculation date 10 days in they enroll.

01:05:33.507 --> 01:05:36.707

in six hours in mod one and six hours in.

01:05:36.707 --> 01:05:39.897

Mod 2. So as of the PRD date.

01:05:39.897 --> 01:05:42.907

they are enrolled in 12 hours. So the school.

01:05:42.907 --> 01:05:44.807

pays the student of full time pal.

01:05:45.737 --> 01:05:49.247

The student ended up withdrawing in module one, and never.

01:05:49.247 --> 01:05:50.857

attends module 2.

01:05:51.417 --> 01:05:54.637

The school performs a mandatory Pell recalculation and they pay.

01:05:54.637 --> 01:05:57.957

them a halftime pell. Now, since.

01:05:57.957 --> 01:06:01.177

the six hours in Module 2, we're not.

01:06:01.177 --> 01:06:04.287

ultimately used to determine the title 4 eligibility, remember?

01:06:04.287 --> 01:06:07.697

they only got 1/2 time pell and they never attended.

01:06:07.697 --> 01:06:10.937

One day in mod to the day in module 2.

01:06:10.937 --> 01:06:14.407

are not factored into the R2T4 calculation.

01:06:14.407 --> 01:06:17.857

Now my friends, what you're going to see through a lot of these examples.

01:06:17.857 --> 01:06:21.137

I had to really narrowly develop them in such a way.

01:06:21.137 --> 01:06:24.337

that it would draw exemptions we just covered.

01:06:24.337 --> 01:06:24.337

01:06:24.387 --> 01:06:28.437

Don't come into play. Remember if the withdrawal exemptions.

01:06:28.437 --> 01:06:31.537

come into play in the student is exempt, you won't have to.

01:06:31.537 --> 01:06:34.617

do these calculations, so please keep that in mind.

01:06:34.617 --> 01:06:38.057

as well. Our example two is a similar situation.

01:06:38.057 --> 01:06:41.217

but in this case the school has elected to adopt.

01:06:41.217 --> 01:06:44.277

in R2T4 Freeze day. They enroll in.

01:06:44.277 --> 01:06:47.497

a semester with two eight week modules. Again, they have a Pell

01:06:47.497 --> 01:06:50.517

Recalculation date 10 days in the school.

01:06:50.517 --> 01:06:53.537

decides to set their R 2T4 freeze.

01:06:53.537 --> 01:06:56.647

date at the same time as there Pell recalculation date.

01:06:56.647 --> 01:06:56.647

01:06:56.697 --> 01:06:59.867

Which they can do. Student enrolls in six hours.

01:06:59.867 --> 01:07:02.007

in MoD one in six hours in MoD 2.

01:07:02.757 --> 01:07:06.247

So as of the R2T4 freeze date, the student is enrolled.

01:07:06.247 --> 01:07:09.237

in 12 hours in both modules one and two.

01:07:09.917 --> 01:07:12.957

They pay the student full time Pell student ends up.

01:07:12.957 --> 01:07:16.197

withdrawing in module one never attends Module 2.

01:07:16.197 --> 01:07:16.197

01:07:16.957 --> 01:07:19.987

School performs a mandatory Pell Recalculation, and they do.

01:07:19.987 --> 01:07:22.207

pay the student only for 1/2 time, Pell.

01:07:22.907 --> 01:07:25.937

However, in this case, since the coursework that the.

01:07:25.937 --> 01:07:29.157

student was enrolled in as of the schools are R2T4

01:07:29.157 --> 01:07:32.337

freeze date was for Module 1.

01:07:32.337 --> 01:07:35.417

and Module 2 the days in both.

01:07:35.417 --> 01:07:39.087

modules are factored into the R2T4 calculation.

01:07:39.087 --> 01:07:39.087

01:07:41.807 --> 01:07:43.187

In example 3.

01:07:43.907 --> 01:07:47.477

We have no R2T4 freeze date for a Pell recipient.

01:07:47.477 --> 01:07:50.407

who later becomes eligible for direct loan funds.

01:07:51.187 --> 01:07:54.277

Again enrolled in this semester with two eight week modules.

01:07:54.277 --> 01:07:57.807

one Pell Recalculation date, 10 days in the.

01:07:57.807 --> 01:08:00.877

student enrolls in three hours in Mod one as of the.

01:08:00.877 --> 01:08:03.967

PRD date, but a week after the.

01:08:03.967 --> 01:08:07.227

Pell Recalculation date the student enrolls in three more hours.

01:08:07.227 --> 01:08:09.917

in Module 2 and requests a direct loan.

01:08:10.497 --> 01:08:13.757

The school pays them a less than half time Pell because as.

01:08:13.757 --> 01:08:16.827

of the Pell recalculation date again they were only enrolled.

01:08:16.827 --> 01:08:20.397

in three hours, but they also provided direct loan disbursement.

01:08:20.397 --> 01:08:20.397

01:08:20.947 --> 01:08:23.977

Because the student is registered for halftime and they.

01:08:23.977 --> 01:08:27.477

get that disbursement, the student ends up withdrawing in module.

01:08:27.477 --> 01:08:31.197

one. And never attends module 2the.

01:08:31.197 --> 01:08:34.217

school, does not have to do Pell recalculation, nor.

01:08:34.217 --> 01:08:37.337

do they have to adjust the loan funds 'cause the student was eligible for.

01:08:37.337 --> 01:08:40.957

the loan funds at the time of disbursement now.

01:08:40.957 --> 01:08:44.377

since the three hours in Module 2 did impact.

01:08:44.377 --> 01:08:47.697

the enrollment status required to establish the students.

01:08:47.697 --> 01:08:50.797

Title 4 eligibility, remember this school does not have a.

01:08:50.797 --> 01:08:51.567

freeze day.

01:08:52.867 --> 01:08:56.337

In order for them to receive the direct loans that particular.

01:08:56.337 --> 01:08:59.797

course work was required, therefore the days.

01:08:59.797 --> 01:09:02.847

in module one and two are factored into.

01:09:02.847 --> 01:09:05.427

the R2T4 calculation.

01:09:09.487 --> 01:09:12.787

In this example, similar situation, but they have an.

01:09:12.787 --> 01:09:14.497

R2T4 freeze date.

01:09:15.107 --> 01:09:18.217

Again, a semester with two eight week modules they have.

01:09:18.217 --> 01:09:21.377

one Pell Recalculation date which the school also.

01:09:21.377 --> 01:09:25.497

uses as their R2T4 freeze date as.

01:09:25.497 --> 01:09:28.847

of the R2T4 freeze date, the student is only enrolled.

01:09:28.847 --> 01:09:32.257

in three hours in module 1.

01:09:32.257 --> 01:09:35.617

a week after the R2T4 freeze date, they enroll in three.

01:09:35.617 --> 01:09:38.647

hours in module 2 an requests a direct loan.

01:09:38.647 --> 01:09:38.647

01:09:39.327 --> 01:09:43.117

They're paid less than half time, Pell, and given the direct loan disbursement.

01:09:43.117 --> 01:09:46.407

the student ends up withdrawing in Module 1.

01:09:46.407 --> 01:09:48.767

e. And never attends module 2.

01:09:50.287 --> 01:09:53.467

They do not have to do a Pell recalculation. Nor adjust loan.

01:09:53.467 --> 01:09:56.937

funds 'cause this student was eligible for the amounts they receive.

01:09:56.937 --> 01:10:00.247

Since the coursework enrolled in as.

01:10:00.247 --> 01:10:03.287

of the schools freeze date R2T.

01:10:03.287 --> 01:10:06.807

4 freeze date was only for module one and.

01:10:06.807 --> 01:10:09.947

the student never attended at least one day in module.

01:10:09.947 --> 01:10:12.977

2. Only the days in module one are factored.

01:10:12.977 --> 01:10:15.137

in the R2T4 calculation.

01:10:17.427 --> 01:10:20.477

Example 5 is Pell only recipient with no.

01:10:20.477 --> 01:10:24.117 R2T4 freeze date. This semester has five.

01:10:24.117 --> 01:10:27.257

four week modules. They use Pell recalculation.

01:10:27.257 --> 01:10:30.397

date 10 days in the student enrolled.

01:10:30.397 --> 01:10:33.907

in two credit hour courses in all five modules.

01:10:33.907 --> 01:10:37.197

for a total of 10 hours. As of the PRD.

01:10:37.197 --> 01:10:40.377

date, the students started 2 hours in Module 1.

01:10:40.377 --> 01:10:43.607

e and was enrolled in 10 hours. The school.

01:10:43.607 --> 01:10:47.497

paid the student of three quarter time Pell, however.

01:10:47.497 --> 01:10:47.497

01:10:47.697 --> 01:10:50.987

The student completes module one starts.

01:10:50.987 --> 01:10:54.277

attending Module 2 but then decides to completely.

01:10:54.277 --> 01:10:57.327

withdraw. The school does have to perform a.

01:10:57.327 --> 01:11:00.347

mandatory power recalculation and pay the student less than.

01:11:00.347 --> 01:11:03.547

half time Pell because the student only started 4.

01:11:03.547 --> 01:11:06.587

hours in modules, one in Module 2.

01:11:06.587 --> 01:11:09.627

Now though, the student was only paid a less than half.

01:11:09.627 --> 01:11:12.657

time Pell amount which could equate to only the coursework in.

01:11:12.657 --> 01:11:16.187

mod one. Remember, since the student attended.

01:11:16.187 --> 01:11:18.107

at least one day in Module 2.

01:11:18.287 --> 01:11:21.327

The days in mod one and two are factored.

01:11:21.327 --> 01:11:24.597

into the R2T4 calculation again.

01:11:24.597 --> 01:11:28.057

this is an example of a school with no R2T4 freeze date.

01:11:28.057 --> 01:11:31.457

While our last example again somewhat similar.

01:11:31.457 --> 01:11:33.737

is going to have an R2T4 freeze date.

01:11:34.537 --> 01:11:38.027

With both Pell and direct loan funds.

01:11:38.027 --> 01:11:41.837

student enrolls in a semester with five four week modules.

01:11:41.837 --> 01:11:45.007

They use one Pell Recalculation date, 10 days in.

01:11:45.007 --> 01:11:48.147

and they also choose to use their Pell recalculation date as.

01:11:48.147 --> 01:11:51.567

the R2T4 Freeze date student enrolled.

01:11:51.567 --> 01:11:54.987

in 2-3 credit hour courses in Module 1.

01:11:54.987 --> 01:11:58.147

As of the R2T4 freeze date, they.

01:11:58.147 --> 01:12:01.167

pay the student halftime Pell and provided direct loan.

01:12:01.167 --> 01:12:04.417

disbursement. Now towards the end of module.

01:12:04.417 --> 01:12:04.747

1.

01:12:04.797 --> 01:12:08.147

The student decides to enroll in a three credit hour course in Mod 2.

01:12:08.147 --> 01:12:12.007

and a three credit hour course in Mod 3, however.

01:12:12.007 --> 01:12:15.987

after attending a few days and mod 2 the student completely.

01:12:15.987 --> 01:12:19.167

withdraw, the school does not have to do.

01:12:19.167 --> 01:12:22.257

Pell recalculation because.

01:12:22.257 --> 01:12:25.267

they only paid them. They have time Pell, which equates.

01:12:25.267 --> 01:12:28.347

to what they started in module one and.

01:12:28.347 --> 01:12:32.277

the loan funds did not have to be adjusted because at the time they receive.

01:12:32.277 --> 01:12:35.547

their direct loan disbursement, they were registered.

01:12:35.547 --> 01:12:36.517

or enrolled half time.

01:12:36.567 --> 01:12:39.657

Now, though, the student was only.

01:12:39.657 --> 01:12:42.807

enrolled in coursework in module one. As of the freeze date.

01:12:42.807 --> 01:12:46.017

Remember they were only enrolled in six hours in mod one. As of the freeze.

01:12:46.017 --> 01:12:49.177

date. Since the student attended at least one.

01:12:49.177 --> 01:12:52.557

day in Module 2 but never attended module.

01:12:52.557 --> 01:12:55.577

3, the school would include the days in module.

01:12:55.577 --> 01:12:58.617

one and two in the R2T4.

01:12:58.617 --> 01:13:01.797

calculation. So again, these different examples.

01:13:01.797 --> 01:13:05.067

we're trying to showcase freeze dates or no freeze dates.

01:13:05.067 --> 01:13:06.627

Some of the differences.

01:13:06.707 --> 01:13:09.797

And showing situations where sometimes one.

01:13:09.797 --> 01:13:12.877

way may again appear more beneficial for a

01:13:12.877 --> 01:13:14.197

student than others.

01:13:15.717 --> 01:13:19.547

As mentioned with ASAP, we want to point out there were COVID-19.

01:13:19.547 --> 01:13:22.817

flexibility's and still are related to R2T4.

01:13:22.817 --> 01:13:26.317

especially our May 15th 2020 electronic.

01:13:26.317 --> 01:13:29.387

announcement went into quite a bit of detail. Want to point out

01:13:29.387 --> 01:13:32.597

that as it stands now, these flexibilities will.

01:13:32.597 --> 01:13:36.147

be in place for any payment periods that begin between March 13th.

01:13:36.147 --> 01:13:39.627

and the last date that the national emergency is in effect.

01:13:39.627 --> 01:13:39.627

01:13:40.227 --> 01:13:43.817

And I'm sure we all hope that's going to happen soon, but until that does.

01:13:43.817 --> 01:13:47.277

these flexibility is about not having to return Title 4 funds.

01:13:47.277 --> 01:13:50.977

if students withdrew due to COVID-19 are still in place.

01:13:50.977 --> 01:13:50.977

01:13:52.037 --> 01:13:55.287

Several resources here to consider, especially.

01:13:55.287 --> 01:13:58.447

in the middle. We have our distance, education and innovation.

01:13:58.447 --> 01:14:01.687

Final Federal Register notice to take.

01:14:01.687 --> 01:14:04.847

note of within the Preamble and the actual regulations.

01:14:04.847 --> 01:14:07.887

can provide additional reference and information for.

01:14:07.887 --> 01:14:09.807

you on today's topics.

01:14:10.947 --> 01:14:14.337

And finally, if you do have any outstanding questions.

01:14:14.337 --> 01:14:17.357

that are not addressed through our Q and.

01:14:17.357 --> 01:14:20.797

A format at the end of today's session, please.

01:14:20.797 --> 01:14:23.897

note that you can submit your questions through our new.

01:14:23.897 --> 01:14:26.917

customer support process in FSA's.

01:14:26.917 --> 01:14:30.347

help center, and the link is listed here, remember.

01:14:30.347 --> 01:14:33.567

that when you are submitting a question through this format, one.

01:14:33.567 --> 01:14:36.817

of the items in a drop down box you will select is.

01:14:36.817 --> 01:14:40.277

a topic, and for questions related to today's.

01:14:40.277 --> 01:14:41.157

webinar.

01:14:41.397 --> 01:14:45.207

I want to stress please select the topic FSA.

01:14:45.207 --> 01:14:49.287

ask A fed slash policy with.

01:14:49.287 --> 01:14:52.307

that I hope you enjoyed today's webinar. I'm

01:14:52.307 --> 01:14:55.427

going to turn it back over to our training officer.

01:14:55.427 --> 01:14:58.567

Trevor Summers, who will lead our discussion.

01:14:58.567 --> 01:15:02.747

today with our Q& A format Trevor.

01:15:02.747 --> 01:15:02.747

01:15:03.577 --> 01:15:06.607

Thank you very much, David were looking over all the.

01:15:06.607 --> 01:15:09.977

questions that have been submitted throughout the presentation.

01:15:09.977 --> 01:15:13.567

and I think we're going to start here with questions related.

01:15:13.567 --> 01:15:16.727

to the satisfactory academic progress topic.

01:15:16.727 --> 01:15:19.787

And then once we get through as many of those as we can, will shift to the right.

01:15:19.787 --> 01:15:22.847

return of Title 4 funds. So I'll turn it over to my colleague.

01:15:22.847 --> 01:15:26.107

Anita to read some of the questions that came.

01:15:26.107 --> 01:15:29.427

in an then the presenters can answer.

01:15:29.427 --> 01:15:33.007

those as appropriate and Anita. I'll turn it over to you, thank.

01:15:33.007 --> 01:15:36.237

you trevor. OK, the first question that came in regarding ASAP.

01:15:36.237 --> 01:15:36.237

01:15:36.507 --> 01:15:39.517

Yes, does the counter option for pace allow?

01:15:39.517 --> 01:15:42.817

for flexibility for various enrollment intensity such?

01:15:42.817 --> 01:15:46.257

as full-time versus three quarter time? Can you opt?

01:15:46.257 --> 01:15:49.927

for calendar time for full time students but calculation?

01:15:49.927 --> 01:15:52.717

be based on credit hours for part time students?

01:15:54.567 --> 01:15:57.577

Evaluation does not account for calendar time.

01:15:57.577 --> 01:16:01.337

so our policy is that students within the same program.

01:16:01.337 --> 01:16:04.387

for students within the same program institution has to choose to.

01:16:04.387 --> 01:16:07.337

measure pace in calendar time or credit hours.

01:16:08.977 --> 01:16:12.047

OK, the second question is do.

01:16:12.047 --> 01:16:15.387

we only have to have a policy for?

01:16:15.387 --> 01:16:19.017

not attending a payment period and transfer's?

01:16:19.017 --> 01:16:23.327

impact on maximum timeframe if switching?

01:16:23.327 --> 01:16:26.607

to calculating on calendar time or regardless?

01:16:26.607 --> 01:16:30.257

of whether we are using credit hours or to calculate?

01:16:30.257 --> 01:16:34.127

the quantitative SAP schools?

01:16:34.127 --> 01:16:37.567

have to have a transfer policy regardless of using credit.

01:16:37.567 --> 01:16:39.217

or calendar time.

01:16:39.267 --> 01:16:40.427

For pace evaluation.

01:16:41.997 --> 01:16:45.587

Question #3 is how is it maximum timeframe determined?

01:16:45.587 --> 01:16:48.737

for doctoral students max time?

01:16:48.737 --> 01:16:51.787

Max frame for graduate students is defined by the school.

01:16:51.787 --> 01:16:54.907

that's based on the program length. The graduate programs are not held.

01:16:54.907 --> 01:16:56.957

150% next time frame.

01:16:58.677 --> 01:17:01.707

Alright, the next question is were.

01:17:01.707 --> 01:17:04.757

the new R2T4 regulations for modular programs.

01:17:04.757 --> 01:17:04.757

01:17:05.317 --> 01:17:08.467

Intended to be applicable to medical school, I'm.

01:17:08.467 --> 01:17:10.747

sorry this is not an SAP question, but.

01:17:12.067 --> 01:17:14.167

Clinical rotations are taught in modules.

01:17:14.827 --> 01:17:18.357

It's so for non attendance taking institutions were struggling to.

01:17:18.357 --> 01:17:21.797

determine when in R2T4 is necessary.

01:17:21.797 --> 01:17:24.817

The new definition of successful completion requires a.

01:17:24.817 --> 01:17:27.877

passing grade student earned all.

01:17:27.877 --> 01:17:31.007

apps. Normally they wouldn't be withdrawn.

01:17:31.007 --> 01:17:31.007

01:17:31.887 --> 01:17:32.497

Future.

01:17:33.307 --> 01:17:37.137

Stay in it sounds like they will be needed.

01:17:37.137 --> 01:17:39.207

They will need need to be calculated.

01:17:40.007 --> 01:17:43.497

Can you answer that one? Yeah, so this specific.

01:17:43.497 --> 01:17:46.517

regulations. The new exemptions that we put in place as.

01:17:46.517 --> 01:17:50.887

discussed, were not specifically designed.

01:17:50.887 --> 01:17:53.897

for specific programs beyond the fact that we.

01:17:53.897 --> 01:17:57.277

redefined our program with.

01:17:57.277 --> 01:18:00.497

modules stating that programs.

01:18:00.497 --> 01:18:03.747

that have modules are considered standard.

01:18:03.747 --> 01:18:06.957

or non standard term academic calendar.

01:18:06.957 --> 01:18:10.137

programs that are not subscription based with courses that don't go there.

01:18:10.137 --> 01:18:10.137

01:18:10.487 --> 01:18:13.547

Think beyond that, whether or not the exemptions.

01:18:13.547 --> 01:18:16.587

apply, you would have to meet the criteria.

01:18:16.587 --> 01:18:19.697

or the student would have to meet the criteria and there's no.

01:18:19.697 --> 01:18:23.387

additional exemptions provided based on the type.

01:18:23.387 --> 01:18:26.847

or the major that the student.

01:18:26.847 --> 01:18:30.317

is particularly in, whether it's medical school.

01:18:30.317 --> 01:18:33.537

or some other type of program. So the student.

01:18:33.537 --> 01:18:36.777

could have to successfully complete the requisite number.

01:18:36.777 --> 01:18:39.957

of hours or the modules with the requisite.

01:18:39.957 --> 01:18:42.627

number of days in order to meet those exemptions.

01:18:44.007 --> 01:18:47.597

Alright, the next question is does.

01:18:47.597 --> 01:18:50.957

the institution have the option to choose calendar time or?

01:18:50.957 --> 01:18:52.547

to measure in credit hours?

01:18:54.157 --> 01:18:57.737

Calendar time pace evaluation is just an additional flexibility.

01:18:57.737 --> 01:18:58.647

so you can choose.

01:19:00.077 --> 01:19:03.467

So the next question is, well, we can still use our 16.

01:19:03.467 --> 01:19:07.247

SAP policy, which includes pace, yes?

01:19:07.247 --> 01:19:10.367

an if school , excepts all transfer.

01:19:10.367 --> 01:19:13.527

credits. Do schools have the option to only count those?

01:19:13.527 --> 01:19:16.917

hours applicable to the program for a SAP purposes?

01:19:16.917 --> 01:19:16.917

01:19:17.617 --> 01:19:18.037

Yes.

01:19:19.257 --> 01:19:20.767

Alright, and the final question.

01:19:21.717 --> 01:19:24.077

Questions on statement that.

01:19:24.897 --> 01:19:27.927

Are optional is the maximum time frame rule.

01:19:27.927 --> 01:19:30.937

Also optional? Will a School need to establish.

01:19:30.937 --> 01:19:34.057

a maximum time frame based on these new rules, regardless if.

01:19:34.057 --> 01:19:36.647

we measure by credit hour or calendar?

01:19:37.917 --> 01:19:41.307

So I max time frame is not optional though certain programs.

01:19:41.307 --> 01:19:44.887

are exempt from pace evaluation, so schools still.

01:19:44.887 --> 01:19:47.877

have to determine Max time frame for all programs.

01:19:49.237 --> 01:19:53.007

Alright, so that concludes that section questions regarding SAP.

01:19:53.007 --> 01:19:56.067

and I believe we're going to move on to questions regarding.

01:19:56.067 --> 01:19:56.067

01:19:57.537 --> 01:19:59.307

R2T4 and Tasha.

01:20:04.817 --> 01:20:08.047

OK, this is a trevor and.

01:20:08.047 --> 01:20:11.627

I think I'm gonna read these questions from.

01:20:11.627 --> 01:20:14.827

regarding the R2T4.

01:20:14.827 --> 01:20:17.427

So the first question is.

01:20:18.047 --> 01:20:21.357

Has to do with the module environment if.

01:20:21.357 --> 01:20:24.657

the modules overlap, you don't count.

01:20:24.657 --> 01:20:28.537

the duplicated days for the 49% calculation.

01:20:28.537 --> 01:20:29.687

Is that correct?

01:20:31.117 --> 01:20:32.927

That would be correct.

01:20:34.187 --> 01:20:37.337

We're looking at the overall number of days that.

01:20:37.337 --> 01:20:40.477

are contained in a module or combination.

01:20:40.477 --> 01:20:43.757

of modules, so we wouldn't want to double count.

01:20:43.757 --> 01:20:46.807

the days in an overlap situation.

01:20:46.807 --> 01:20:46.807

01:20:48.687 --> 01:20:49.737

OK thanks.

01:20:50.897 --> 01:20:54.137

The next question has to do with modules are different links and it's.

01:20:54.137 --> 01:20:57.197

pretty lengthy, so bear with me while I read through it.

01:20:57.197 --> 01:21:00.397

for the days in the payment period if.

01:21:00.397 --> 01:21:03.557

we have multiple modules, let's say five week.

01:21:03.557 --> 01:21:06.577

a seven week in an 8 week module, we really don't.

01:21:06.577 --> 01:21:09.917

have days in between modules, however.

01:21:09.917 --> 01:21:13.637

a student could have a five week one module.

01:21:13.637 --> 01:21:17.297

and an 8 week second module, and.

01:21:17.297 --> 01:21:21.407

our standard term is 16 weeks or 112 days.

01:21:21.407 --> 01:21:21.407

01:21:21.887 --> 01:21:25.077

For that particular student, there would be days.

01:21:25.077 --> 01:21:28.177

between modules, but overall we don't have.

01:21:28.177 --> 01:21:31.207

scheduled days between modules, so.

01:21:31.207 --> 01:21:34.317

five weeks of 112 would not.

01:21:34.317 --> 01:21:37.337

be 49%. But if we subtract the days.

01:21:37.337 --> 01:21:40.457

between the five week in the eight week course, it would.

01:21:40.457 --> 01:21:43.617

be so maybe we only count the days in the specific.

01:21:43.617 --> 01:21:46.937

modules that the student was enrolled to complete when they stopped.

01:21:46.937 --> 01:21:48.777

or withdrew. Is that correct?

01:21:50.137 --> 01:21:53.187

No, so what we're looking at here is remember, this is just a.

01:21:53.187 --> 01:21:56.387

set formula to determine the overall number.

01:21:56.387 --> 01:21:59.427

of days in the payment period in.

01:21:59.427 --> 01:22:02.977

question. So we're going to look at the overall.

01:22:02.977 --> 01:22:06.007

days that the student could.

01:22:06.007 --> 01:22:09.187

potentially be enrolled in any course work within that.

01:22:09.187 --> 01:22:12.407

payment period, and then from that total number.

01:22:12.407 --> 01:22:15.567

which is the full length we're going to back out any schedule.

01:22:15.567 --> 01:22:18.837

breaks of five consecutive days or more, and then.

01:22:18.837 --> 01:22:20.657

any breaks.

01:22:20.707 --> 01:22:25.337

That currently exist between each.

01:22:25.337 --> 01:22:28.897

module that are in that.

01:22:28.897 --> 01:22:32.107

are within the overall payment period. So if.

01:22:32.107 --> 01:22:35.277

all of your modules are set up such that there is no breaks in.

01:22:35.277 --> 01:22:38.377

between, then there wouldn't be any breaks to exclude, but if.

01:22:38.377 --> 01:22:41.657

you have five modules within your overall payment period.

01:22:41.657 --> 01:22:45.077

and there is always two days.

01:22:45.077 --> 01:22:48.197

between each module, a break between then you could.

01:22:48.197 --> 01:22:51.477

exclude those two days from between each of the modules.

01:22:51.477 --> 01:22:51.477

01:22:51.537 --> 01:22:54.907

So we're not looking at the modules the students are enrolled.

01:22:54.907 --> 01:22:58.527

in to determine the number of days to exclude.

01:22:58.527 --> 01:23:01.707

we're looking at the overall days that.

01:23:01.707 --> 01:23:05.067

are in between the modules.

01:23:05.067 --> 01:23:08.117

in the overall payment period, and I don't know if David.

01:23:08.117 --> 01:23:11.397

Greg wanted to jump in with a little bit more guidance.

01:23:11.397 --> 01:23:14.587

on. But yeah, you want to be careful we're not looking.

01:23:14.587 --> 01:23:17.687

at specifically the modules the student is.

01:23:17.687 --> 01:23:20.867

in as far as if there's a break in between.

01:23:20.867 --> 01:23:24.097

those. Again, we're looking at the overall length.

01:23:24.097 --> 01:23:25.537

of the payment period.

01:23:26.647 --> 01:23:30.097

And using that in this calculation to determine.

01:23:30.097 --> 01:23:33.967

whether or not the student is exempt for R2T4for purposes.

01:23:33.967 --> 01:23:33.967

01:23:35.727 --> 01:23:38.777

And I'll just add something to that. This is David Musser. That was a.

01:23:38.777 --> 01:23:41.877

good question and.a Good answer. Dave bartnicki.

01:23:41.877 --> 01:23:45.137

Yeah, this isn't really important point.

01:23:45.137 --> 01:23:48.217

and one that we've heard a number of questions about in the.

01:23:48.217 --> 01:23:52.237

past few months since the regulations were published, the.

01:23:52.237 --> 01:23:55.437

total number of days that the denominator for the purpose.

01:23:55.437 --> 01:23:58.677

of determining whether the student is a completer, whether they are.

01:23:58.677 --> 01:24:01.807

exempt from being treated as a withdrawal and having to.

01:24:01.807 --> 01:24:04.847

complete the RR2T4 for calculation, that's always.

01:24:04.847 --> 01:24:07.047

using the total number of days in.

01:24:07.107 --> 01:24:10.337

In both modules and full term courses.

01:24:10.337 --> 01:24:13.857

for the period in question. So that's always your denominator.

01:24:13.857 --> 01:24:16.977

for determining the 49% point and then you just.

01:24:16.977 --> 01:24:20.127

look at which modules the student successfully.

01:24:20.127 --> 01:24:23.477

completed and use that as the numerator so.

01:24:23.477 --> 01:24:26.617

that we tried. We are doing our best to make that.

01:24:26.617 --> 01:24:30.557

a straightforward calculation. These things are never exactly straightforward.

01:24:30.557 --> 01:24:33.787

but you're not looking at your not using.

01:24:33.787 --> 01:24:37.457

as the denominator the days that the student is actually scheduled to.

01:24:37.457 --> 01:24:37.457

01:24:37.517 --> 01:24:40.937

To be enrolled in, you're looking at all the days in the period.

01:24:40.937 --> 01:24:40.937

01:24:42.587 --> 01:24:46.267

OK thanks. Will go to the next question regarding.

01:24:46.267 --> 01:24:49.317

enrollment reporting. The question as submitted.

01:24:49.317 --> 01:24:52.417

said, will students still be reported?

01:24:52.417 --> 01:24:55.547

on the enrollment report as withdrawn if they?

01:24:55.547 --> 01:24:58.617

are no longer an R2T4?

01:24:58.617 --> 01:25:01.957

due to half time enrollment or?

01:25:01.957 --> 01:25:05.077

47%? Not sure if the questioner meant 49%.

01:25:05.077 --> 01:25:07.917

and 49 or 47, but it came in that way.

01:25:10.437 --> 01:25:13.667

So for our purposes.

01:25:13.667 --> 01:25:17.287

for our R2T4, we would say the student is not a.

01:25:21.817 --> 01:25:24.967

As far as from the enrollment.

01:25:24.967 --> 01:25:28.327

purposes, Dave or, Greg, I'm not sure if that we've.

01:25:28.327 --> 01:25:30.167

addressed this formally.

01:25:31.947 --> 01:25:35.037

So I'm also interested in Greg's thoughts on this.

01:25:35.037 --> 01:25:38.397

one, but in these situations.

01:25:38.397 --> 01:25:41.517

there's really two. I think two different scenarios.

01:25:41.517 --> 01:25:44.777

In one case that you hear from.

01:25:44.777 --> 01:25:47.917

the student that he or she is just choosing to withdraw.

01:25:47.917 --> 01:25:51.177

at. Let's give an example. Let's say that the student completes a module.

01:25:51.177 --> 01:25:54.337

successfully, completes a module that constitutes more.

01:25:54.337 --> 01:25:57.897

than 49% of the period, right? They got a passing grade.

01:25:57.897 --> 01:26:01.007

so then the student informs you the.

01:26:01.007 --> 01:26:02.717

institution I'm withdrawing.

01:26:02.767 --> 01:26:06.087

I'm not. I'm not continuing in this payment period, and I don't intend.

01:26:06.087 --> 01:26:09.157

to continue in a subsequent payment period, so that's.

01:26:09.157 --> 01:26:12.717

a student who withdrew, right? But that student?

01:26:12.717 --> 01:26:15.837

is you have to report that.

01:26:15.837 --> 01:26:19.547

student as a withdrawal the next time that you submit your enrollment reporting.

01:26:19.547 --> 01:26:22.557

but you would treat that student just like you would.

01:26:22.557 --> 01:26:26.297

treat a student who withdrew between terms.

01:26:26.297 --> 01:26:29.657

Because, let's say a student, and under normal circumstances.

01:26:29.657 --> 01:26:32.687

completed a term, they got their great. They got a “B”.

01:26:32.687 --> 01:26:33.497

or whatever.

01:26:33.657 --> 01:26:36.667

And then three days later, the student said I'm withdrawing I'm.

01:26:36.667 --> 01:26:40.147

leaving this program and I'm not coming back essentially the same.

01:26:40.147 --> 01:26:43.447

The same process would apply here when a student.

01:26:43.447 --> 01:26:46.507

has successfully completed that module, we treat them.

01:26:46.507 --> 01:26:49.597

as their having completed for purposes of R2T4.

01:26:49.597 --> 01:26:52.687

but they're leaving so.

01:26:52.687 --> 01:26:55.747

you still have to report them. You would just do that in accordance with your normal.

01:26:55.747 --> 01:26:59.367

procedures for reporting a student withdrawn after.

01:26:59.367 --> 01:27:00.737

they've completed a term.

01:27:03.197 --> 01:27:04.577

Yeah I would. I would agree with that.

01:27:06.097 --> 01:27:09.407

Yeah, I would agree to do and it is important to note.

01:27:09.407 --> 01:27:12.497

that just because someone

01:27:12.497 --> 01:27:15.537

is listed as withdrawn in NSLDS.

01:27:15.537 --> 01:27:19.097

does not mean that there's necessarily an R2T4 for calculation.

01:27:19.097 --> 01:27:22.127

within their file or tide to that withdrawals so.

01:27:22.127 --> 01:27:25.167

that's a good point to make you.

01:27:25.167 --> 01:27:28.797

will also have some situations Dave and I think I mentioned it earlier my example.

01:27:28.797 --> 01:27:32.037

if the student was only scheduled to attend.

01:27:32.037 --> 01:27:35.207

two modules and they completed those modules.

01:27:35.207 --> 01:27:36.247

even though.

01:27:36.877 --> 01:27:40.187

They are done with attendance in that particular.

01:27:40.187 --> 01:27:43.397

payment period there, and there's no R2T4 for that, has to.

01:27:43.397 --> 01:27:47.507

e done in that case. They're not considered a withdrawal because the intention is that they are coming back

01:27:50.217 --> 01:27:53.377

Next period, so you're right schools.

01:27:53.377 --> 01:27:56.637

We have to look carefully at this just because in.

01:27:56.637 --> 01:27:59.667

R2T4 doesn't have to be done doesn't mean that the student is.

01:27:59.667 --> 01:28:01.867

not listed as withdrawan inNSLDS.

01:28:03.457 --> 01:28:06.717

OK, thanks david. I like to go to the next question.

01:28:06.717 --> 01:28:09.797

which is what if a student?

01:28:09.797 --> 01:28:12.837

successfully completes module one which.

01:28:12.837 --> 01:28:16.157

is over 49% of the payment period an.

01:28:16.157 --> 01:28:19.637

earns a “B” then continues and completes.

01:28:19.637 --> 01:28:23.067

module 2 but earns an F in module 2.

01:28:23.067 --> 01:28:27.647

Is this no longer considered in R2T4 situation?

01:28:27.647 --> 01:28:27.647

01:28:29.647 --> 01:28:33.027

Correct, so when you're evaluating?

01:28:33.027 --> 01:28:36.447

a student who withdraws the 1st.

01:28:36.447 --> 01:28:39.487

t thing and there's modules involved or the on the.

01:28:39.487 --> 01:28:42.677

student hasn't graduated early the hours.

01:28:42.677 --> 01:28:45.817

or days early, then the school does need to.

01:28:45.817 --> 01:28:48.937

evaluate the exemption criteria to determine if the.

01:28:48.937 --> 01:28:52.347

student falls under that. If in evaluating the student has in.

01:28:52.347 --> 01:28:55.357

fact successfully completed a module, or.

01:28:55.357 --> 01:28:58.437

modules with the number of days equaling 49%.

01:28:58.437 --> 01:28:59.787

or more.

01:28:59.837 --> 01:29:03.637

Then correct R2T4 four would not apply.

01:29:03.637 --> 01:29:03.637

01:29:04.977 --> 01:29:08.487

OK thanks. Just two or three more questions.

01:29:08.487 --> 01:29:12.417

The next question is with the R2T4 exemptions.

01:29:12.417 --> 01:29:16.047

does it literally have to be a passing grade students?

01:29:16.047 --> 01:29:19.237

with earned Fs completed that class?

01:29:19.237 --> 01:29:22.617

an the enrollment period? They just did not pass it?

01:29:22.617 --> 01:29:25.967

This is different than a student who received an F for a non.

01:29:25.967 --> 01:29:27.907

completion of the class.

01:29:28.677 --> 01:29:32.317

Yes, they must be passing grades.

01:29:32.317 --> 01:29:35.497

for our definition of successful completion means.

01:29:35.497 --> 01:29:38.857

that the student has earned a passing grade.

01:29:38.857 --> 01:29:38.857

01:29:39.697 --> 01:29:42.937

And one quick clarification. There 2 dave.

01:29:42.937 --> 01:29:45.947

so that Dave is exactly right if.

01:29:45.947 --> 01:29:49.247

you're talking about meeting the exemption for successfully completing.

01:29:49.247 --> 01:29:52.297

a module, it needs to be a passing grade in.

01:29:52.297 --> 01:29:55.527

order to consider it successful completion. However, let's.

01:29:55.527 --> 01:29:59.517

say that you've got two modules and the student.

01:29:59.517 --> 01:29:59.517

01:30:01.017 --> 01:30:04.127

Doesn't complete the first one, but continues on to the second one.

01:30:04.127 --> 01:30:07.167

Let's say the student gets an F in the first one.

01:30:07.167 --> 01:30:10.347

and then it continues on to the second one and then gets all.

01:30:10.347 --> 01:30:13.607

the way to the end of the second one and gets an earned F your school.

01:30:13.607 --> 01:30:17.007

has a policy for using earned Fs that differentiates.

01:30:17.007 --> 01:30:20.707

between students who completed the period and students who completed.

01:30:20.707 --> 01:30:24.007

who didn't complete the period. Maybe you say that the second is.

01:30:24.007 --> 01:30:27.187

a W and the earned F is an F, so let's.

01:30:27.187 --> 01:30:29.377

say in that case the student completed.

01:30:31.177 --> 01:30:34.527

both modules completed module two with an earned?

01:30:34.527 --> 01:30:37.707

F and they and they were not scheduled to attend any.

01:30:37.707 --> 01:30:41.067

further classes after. So that rule still.

01:30:41.067 --> 01:30:44.307

applies and we want to be really clear about that when you.

01:30:44.307 --> 01:30:47.347

get an earned F at the end of all of the.

01:30:47.347 --> 01:30:50.597

modules that you were scheduled to attend, then you're still.

01:30:50.597 --> 01:30:53.767

treated as having completed the period and there's no R2T4

01:30:53.767 --> 01:30:56.907

required. But what we want to be really careful about is.

01:30:56.907 --> 01:31:00.547

people. People need to understand that the exemption criteria.

01:31:00.547 --> 01:31:03.647

for completing just one module or a combination of modules.

01:31:03.647 --> 01:31:06.137

over 49% that requires a passing grade.

01:31:06.187 --> 01:31:09.217

Paid, but when your student gets to the end of all the students classes.

01:31:09.217 --> 01:31:12.677

they were scheduled to attend and then the last one they get that earned F.

01:31:12.677 --> 01:31:14.617

That student is also still a completer.

01:31:15.727 --> 01:31:19.337

Yeah, it's important to note that these exemptions are in addition to.

01:31:19.337 --> 01:31:22.727

a lot of our current guidance that still in effect.

01:31:22.727 --> 01:31:26.107

OK, thanks the next question.

01:31:26.107 --> 01:31:29.437

is the freeze date different?

01:31:29.437 --> 01:31:32.117

from the Pell Recalculation date?

01:31:33.157 --> 01:31:36.347

Yes, they are not one in the same the Pell.

01:31:36.347 --> 01:31:40.257

Recalculation data specifically used when determining.

01:31:40.257 --> 01:31:43.277

the students enrollment status for Pell.

01:31:43.277 --> 01:31:46.887

an teach purposes actually and

01:31:46.887 --> 01:31:50.087

It's used in that respect and the R2T4

01:31:50.087 --> 01:31:53.337

freeze date or what we're calling the R2T4 freeze date.

01:31:53.337 --> 01:31:56.347

is used specifically if the school.

01:31:56.347 --> 01:31:59.747

chooses to determine the number of scheduled days in modules.

01:31:59.747 --> 01:32:03.067

for the R2T4 calculations, they could be the exact.

01:32:03.067 --> 01:32:03.957

same date.

01:32:04.007 --> 01:32:07.457

Or, as I mentioned, they could be different dates established.

01:32:07.457 --> 01:32:10.477

by the school. OK, and we just had one more.

01:32:10.477 --> 01:32:13.497

quick come in and this will be our last question do the.

01:32:13.497 --> 01:32:16.887

new regulations and negate this statement the student?

01:32:16.887 --> 01:32:20.337

is scheduled for classes in both modules one and 2, 3.

01:32:20.337 --> 01:32:23.397

weeks before the end of module one. He drops all those.

01:32:23.397 --> 01:32:27.217

courses in Module 2. Then he completes module one the

01:32:27.217 --> 01:32:30.417

student is considered to have completed the period because.

01:32:30.417 --> 01:32:33.537

he was not scheduled to attend any other courses when he ceased

01:32:33.537 --> 01:32:34.527

attendance

01:32:34.577 --> 01:32:38.327

No calculation is required. Pell must be recalculated.

01:32:38.327 --> 01:32:41.487

only review with those classes on module one is that.

01:32:41.487 --> 01:32:44.947

still correct? That is not going to.

01:32:44.947 --> 01:32:48.307

That's our existing policy. As I mentioned in an earlier.

01:32:48.307 --> 01:32:51.567

slide. That is what our current regulations and our current.

01:32:51.567 --> 01:32:54.627

guidance discuss is. As of July 1, 2021

01:32:54.627 --> 01:32:57.677

or IF schools early implemented, they would need.

01:32:57.677 --> 01:33:01.177

to follow our new definition around determining the scheduled days.

01:33:01.177 --> 01:33:04.307

within modules that the student either attends at least.

01:33:04.307 --> 01:33:06.727

one day or those modules.

01:33:06.967 --> 01:33:10.567

That have impacted the students Title 4 eligibility by looking.

01:33:10.567 --> 01:33:13.577

at what the students enrollment status.

01:33:13.577 --> 01:33:16.617

was as a freeze. Dates or monitoring the students enrollment.

01:33:16.617 --> 01:33:19.677

status throughout their payment period.

01:33:19.677 --> 01:33:23.007

So yes, that particular guidance that was being referenced.

01:33:23.007 --> 01:33:26.167

will be going away effective July 1, 2021.

01:33:26.167 --> 01:33:29.777

OK, thanks David, that's the majority of the questions.

01:33:29.777 --> 01:33:32.977

and that's all our time. So I just wanted to share.

01:33:32.977 --> 01:33:35.997

some closing comments. We wanted to thank everyone for.

01:33:35.997 --> 01:33:37.827

joining us in today's webinar

01:33:37.877 --> 01:33:40.887

If you have remaining questions, you can submit them through our.

01:33:40.887 --> 01:33:44.387

customer portal helpdesk at FSA partners.

01:33:44.387 --> 01:33:47.947

.ed.gov backslash help center or.

01:33:47.947 --> 01:33:51.547

you can see the last bullet on this slide we.

01:33:51.547 --> 01:33:54.647

encourage you to also participate.

01:33:54.647 --> 01:33:57.987

in the two remaining sessions. Distance education.

01:33:57.987 --> 01:34:01.127

And institutional eligibility that will be presented.

01:34:01.127 --> 01:34:04.807

by Greg Martin of Ope an David Muster of FSA.

01:34:04.807 --> 01:34:07.907

on Monday, April 26 from 2:00 PM to.

01:34:07.907 --> 01:34:09.117

3:30 PM.

01:34:09.487 --> 01:34:12.637

And subscription based programs, also presented by.

01:34:12.637 --> 01:34:16.367

Greg Martin and David Musser on Monday, May 10th.

01:34:16.367 --> 01:34:19.377

from 2:00 PM to 3:30 PM, Thank.

01:34:19.377 --> 01:34:22.497

you everyone for your attendance and those good questions have.

01:34:22.497 --> 01:34:23.267

a great day.

01:34:23.297 --> 01:34:33.297

01:34:33.297 --> 01:34:39.267