Dear all

As of Last Friday, the Department released the last part of its 2011-12 Student Financial Aid Handbook (SFA-HB).

The entire publication is marked with NEW notes in all of its sections.

However, pages 5-92 – 5-101 are significantly marked as new since the new approach to modules is introduced in this publication.

RGM in prior emails to its clients have covered this issue, however, since it is now published on the SFA-HB, we believe that is worth to revisit these new requirements in reference to all courses that are though in modules.

Extracted from pages 5-92 (2011-12 SFA-HB)

***Withdrawals from programs offered in modules***

Previously, under guidance provided in Dear Colleague Letter GEN-00-24, if a student attending a standard, term-based program of­fered in modules ceased attendance after completing one module, the stu­dent was not considered to have withdrawn, and the school was not re­quired to perform a Return calculation. This is no longer the case. Under the October 29, 2010, final regulations, for all programs offered in mod­ules, a student is a withdrawal for Title IV purposes if the student ceases attendance at any point prior to completing the payment period or period of enrollment, unless the school obtains written confirmation from the student at the time of the withdrawal that he or she will attend a module that begins later in the same payment period or period of enrollment

In addition, for a student in a nonterm or nonstandard-term pro­gram offered in modules, a student is considered to have withdrawn from the program if the student is not scheduled to begin another course with­in the payment period or period of enrollment for more than 45 calendar days after the end of the module the student ceased attending, unless the student is on an approved leave of absence. So, for a student in a nonterm or nonstandard term program offered in modules who ceases attendance, the student is a withdrawal for Title IV purposes unless the school obtains written confirmation from the student at the time of the withdrawal that he or she will attend a module that begins later in the same payment pe­riod or period of enrollment, provided the later module the student will attend begins no later than 45 calendar days after the end of the module the student ceased attending.

If a school obtains a written confirmation of future attendance but the student does not return as scheduled, the student is considered to have withdrawn from the payment period or period of enrollment and the student’s withdrawal date and the total number of calendar days in the payment period or period of enrollment would be the withdrawal date and total number of calendar days that would have applied if the stu­dent had not provided written confirmation of future attendance.

Extracted from pages 5-93 (2011-12 SFA-HB)

**Determining if a program is offered in modules**

A program is offered in modules if, for a payment period or period of enrollment, a course or courses in the program do not span the entire length of the payment period or period of enrollment. The determination of whether a program is offered in modules is made on a payment peri­od-by-payment period or period of enrollment-by-period of enrollment basis, as appropriate, and is student specific. So, while some payment pe­riods or periods of enrollment in a student’s program may be considered to be offered in modules, others may not. If all the courses in a program for a particular payment period or period of enrollment, as applicable, span the entire length of the period, the program is never considered to be offered in modules for that period for any student who withdraws dur­ing the period.

Conversely, if none of the courses in a program for a particular pay­ment period or period of enrollment span the entire length of the period, the program is always considered to be offered in modules for that period for any student who withdraws during the period. If some courses in the program for a particular payment period or period of enrollment span the entire length of the period but some do not, the program is considered to be offered in modules only for those students who are scheduled to attend at least one course that does not span the entire length of the period, and withdraw during the period.

Extracted from pages 5-94 (2011-12 SFA-HB)

**How to determine whether a student in a program offered in modules has withdrawn**

Schools can determine whether a student enrolled in a series of modules is a withdrawal by asking the following questions.

1) After beginning attendance in the payment period or period of enrollment, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend? If the answer is no, this is not a withdrawal. If the an­swer is yes, go to question 2.

2) When the student ceased to attend or failed to be­gin attendance in a course he or she was scheduled to attend, was the student still attending any other courses? If the answer is yes, this is not a withdrawal; however other regulatory provisions concerning recalculation may apply. If the answer is no, go to question 3.

3) Did the student confirm attendance in a course in a module beginning later in the period (for nonterm and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)? If the answer is yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds re­quirements apply.

Extracted from pages 5-95 (2011-12 SFA-HB)

**Examples of using the three questions to determine whether a student who is scheduled to complete two courses in each of the first two of three modules within a payment period has withdrawn**

**Scenario 1**

The student begins attendance in both courses in the first module, but ceases to attend both courses after just a few days and does not confirm that he will return to any courses in mod­ules two or three. The student is a withdrawal because he or she ceased to attend courses he or she was scheduled to attend (Yes to question 1); was not still attending any other courses (No to question 2); and did not confirm attendance in a course in a module beginning later in the period (No to question 3).

**Scenario 2**

If, however, the student begins attendance in both courses in the first module, but drops just one of the courses after just a few days, the student is not a withdrawal. Although the stu­dent ceased to attend a course he or she was scheduled to attend (Yes to question 1), the stu­dent was still attending another course (Yes to question 2). Of course, the student’s eligibility must be recalculated.

**Scenario 3**

If the student completes both courses in module one, but officially drops both courses in module two while still attending the courses in module one, the student is not a withdrawal. Because the student officially dropped both courses in module two before they began, the student did not cease to attend or fail to begin attendance in a course he or she was sched­uled to attend (No to question 1). However, because the student did not begin attendance in all courses, other regulatory provisions concerning recalculation may apply.

**RGM Examples:**

This is a payment period that includes 8 subjects/courses going from 21 **calendar** days to 84days

|  |  |  |
| --- | --- | --- |
| a-21 | d-55 | h-29 |
| b-21 | e-84 |
| c-21 | f-21 | g-63 |

Dropping out of school on the tenth day of classes, within the first 21 days

The student will not be considered withdraw and R2T4 would not apply **IF** the institution obtains written confirmation from the student at the time of the withdrawal that he or she will attend a module that begins later in the same payment pe­riod or period of enrollment, provided the later module the student will attend begins no later than 45 calendar days after the end of the module the student ceased attending.

That means that the student plans to return to course “d”, “e”, “f” or “g” but not “h” since “h” does not start until after 45 days from the end of the first 21 days.

If the student enrolls in subject “e” and drops from subjects “d” and “f” the student still enrolled because the subject spans till the end of the PP.

If the student drops from subject “e” prior to the start date of subjects “g” and “h”, the school may obtain the statement from the student that will be attending later on in the PP and the student is considered in school and not a withdraw and R2T4 would not apply.

If the student does not returns as scheduled, the student will be considered withdrawn as of the date of the original LDA

Second sample

Payment period of 16 weeks (16\*7=112 calendar days)

Each subject is 4 weeks (28 days) running one at a time

|  |  |  |  |
| --- | --- | --- | --- |
| A | B | c | d |

If the student withdraws any time within the “a” course, the written intent to return if not “b” must be “c’ because “d” is 56 days from the end of “a”.

**FINAL NOTE:**

Cosmetology and barber programs would not be affected by these changes since their courses are not provided by individual subjects, modules or courses. Those programs follow state guidelines requiring subject matter completion.

Any other program degree or not-degree granting, term or not term will be subject to these changes if the payment period in which the student withdraw has modules, subjects or courses that do not span (last or have a duration) from the first day to the last day of the payment period.

***For those courses depending on the individual student curricula and time of withdrawing, the institution could be in a position to recalculate aid eligibility first, before a R2T4 is calculated.***

We need your assistance to determine if you have modules/subjects/courses shorter than your payment periods.

If no, that would be that all the subjects last the entire payment period no further action is would be needed. May we please ask to reply to this email indicating that you do not have subjects shorter than your payment period.

IF YES, PLEASE PROVIDE US WITH THE FOLLOWING:

Active program name with subjects shorter than a payment period

List each subject providing the following for each subject

|  |  |
| --- | --- |
| Lecture Hours |  |
| Lab/Clinic Hours |  |
| Externship Hours |  |
| Homework hours |  |
| Total Hours |  |
| Total credit hours |  |

Length of subject in Instructional weeks

Any Item that does not apply, please enter N/A

The RGM system will use the data provided to calculate and recalculate student eligibility and R2T4