



Changing Regulations Bring About New Processes

**October 27, 2021
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Agenda

- Overview
- Modules
- R2T4 Changes/Exemptions
- Distance Education
- Program Participation Agreement
- Institutional Eligibility

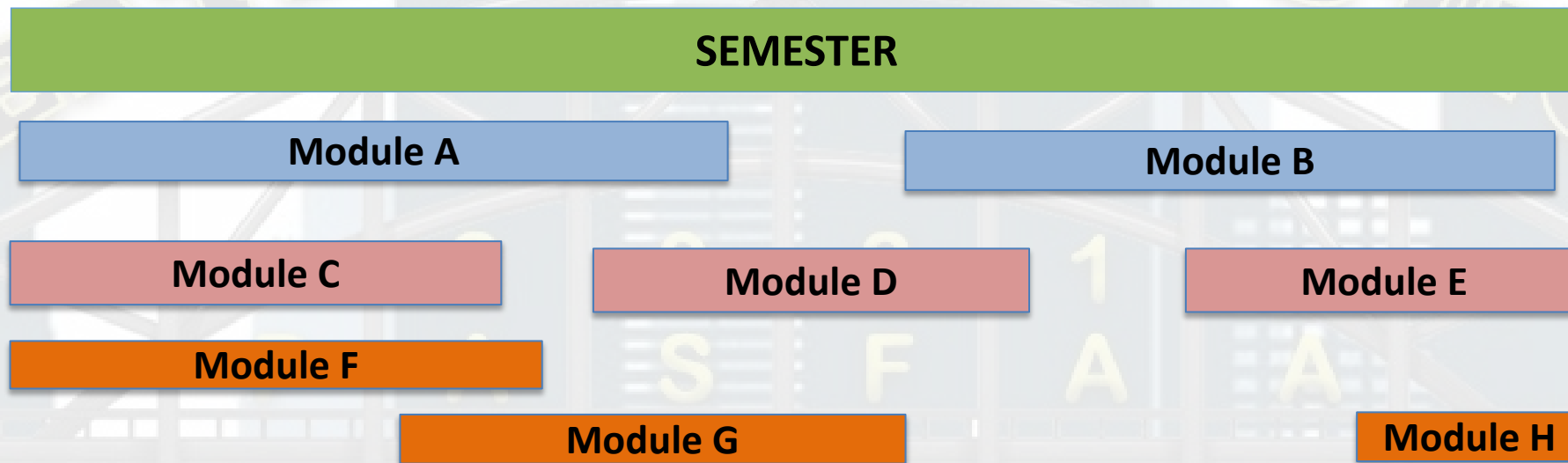
Overview

- Notice of Proposed Rulemaking (NPRM) published April 2, 2020
- Comment period ended May 4, 2020
- Final Rules published September 2, 2020
- Effective July 1, 2021
- Early implementations of all provisions

Program Offered in Modules

- A program is offered in modules if the program uses a standard term or nonstandard-term academic calendar, is not a subscription-based program, and a course or courses in the program do not span the entire length of the payment period or period of enrollment.
- Anytime a course is shorter than the payment period or period of enrollment, the program is offered in modules.

What Do Modules Look Like?



Effective Date for R2T4 Changes

If you did not early implement, new rules apply to all students who withdraw or otherwise cease attendance or graduate on or after the July 1, 2021:

- Even if that is in the middle of summer payment period
- Based on timing of the withdrawal or ceasing attendance, not payment period start date
- Based on LDA (withdrawal date), not the DOD (date of determination)
 - If calendar midpoint is assigned for unofficial withdrawals, midpoint date will determine which R2T4 rules apply
- Applies to credit-hours and clock-hours programs

Exceptions: A Student Is NOT Considered Withdrawn If:

Old Regulations	Current Regulations
<ul style="list-style-type: none">• The institution obtains written confirmation that the student will attend a later module in the same payment period or period of enrollment	<ul style="list-style-type: none">• The institution obtains written confirmation that the student will attend a later module in the same payment period or period of enrollment;• The student completes the requirements for graduation;• The student successfully completes one or more modules that, together, comprise at least 49% of the days in the payment period; or• The student successfully completes coursework equal to or greater than the coursework required for half-time enrollment

R2T4 Exemption: Completing Graduation Requirements

A student is NOT a withdrawal if the student completes all requirements for graduation from his/her/their program before completing the days or hours in the period the student was scheduled to complete

- Aid recalculation rules apply
- Applies to all programs (with or without modules), including clock-hours programs

Clock-Hours Program and Early Graduation

- If a clock-hours student graduates without successfully completing all the established hours in the program:
 - Student is not a withdrawal
 - School must re-prorate the amount of Title IV aid
 - Only pay student for hours successfully completed
- Re-proration adjustment applies only to clock-hours programs when the student completes the hours early (not weeks)
 - Does not apply to credit-hour programs
- Additional information on this guidance will be coming soon

Non-Term Programs and Early Graduation

Payment Period – Clock-Hours Program

300 Clock-Hours/11 weeks

150 Clock-Hours/4 weeks

- Completed graduation requirements
- Ceased attendance
- Not a withdrawal

R2T4 Exemption - 49%

- In a program offered in modules, a student is NOT considered a withdrawal if the student successfully completes Titles IV-Eligible coursework in:
 - One module that includes 49% or more of the number of countable days in the period; or
 - Combination of modules that when combined contain 49% or more of the number of countable days in the period

R2T4 Exemption- 49%

Countable days in the period

- Includes all days in all modules offered during the period
- Excludes:
 - Scheduled breaks of five or more consecutive days
 - All days between modules
- Not same as calculation of days in period for R2T4 denominator
- Cannot be rounded up

How to Look at Days for Determining Countable Days for the 49%

106-Day Semester		
50-Day Session	3-Day Break	53-Day Session

Student registered for one 3-credit course in Session I and one 3-credit course in Session II. Student successfully completes the Session I course and the student drops Session II during the three-day break.

What is the countable days percent?

How to Look at Days for Determining Countable Days for the 49%

106-Day Semester		
50-Day Session	3-Day Break	53-Day Session

50/103=48.5%

Excluded

R2T4 Exemption - Half-Time

- In standard-term and nonstandard-term programs offered in modules, a student is NOT considered a withdrawal if the student successfully completes Title IV-eligible coursework:
 - Equal to or greater than coursework required for school's definition of a half-time student for the period
- Title IV-eligible courses include only courses that count toward degree or certificate completion requirements including required electives (audited courses are not Title IV-eligible courses)

Does This Require an R2T4 Based on the Rules We Showed You?

Summer Term: May 17 – July 30
75 days

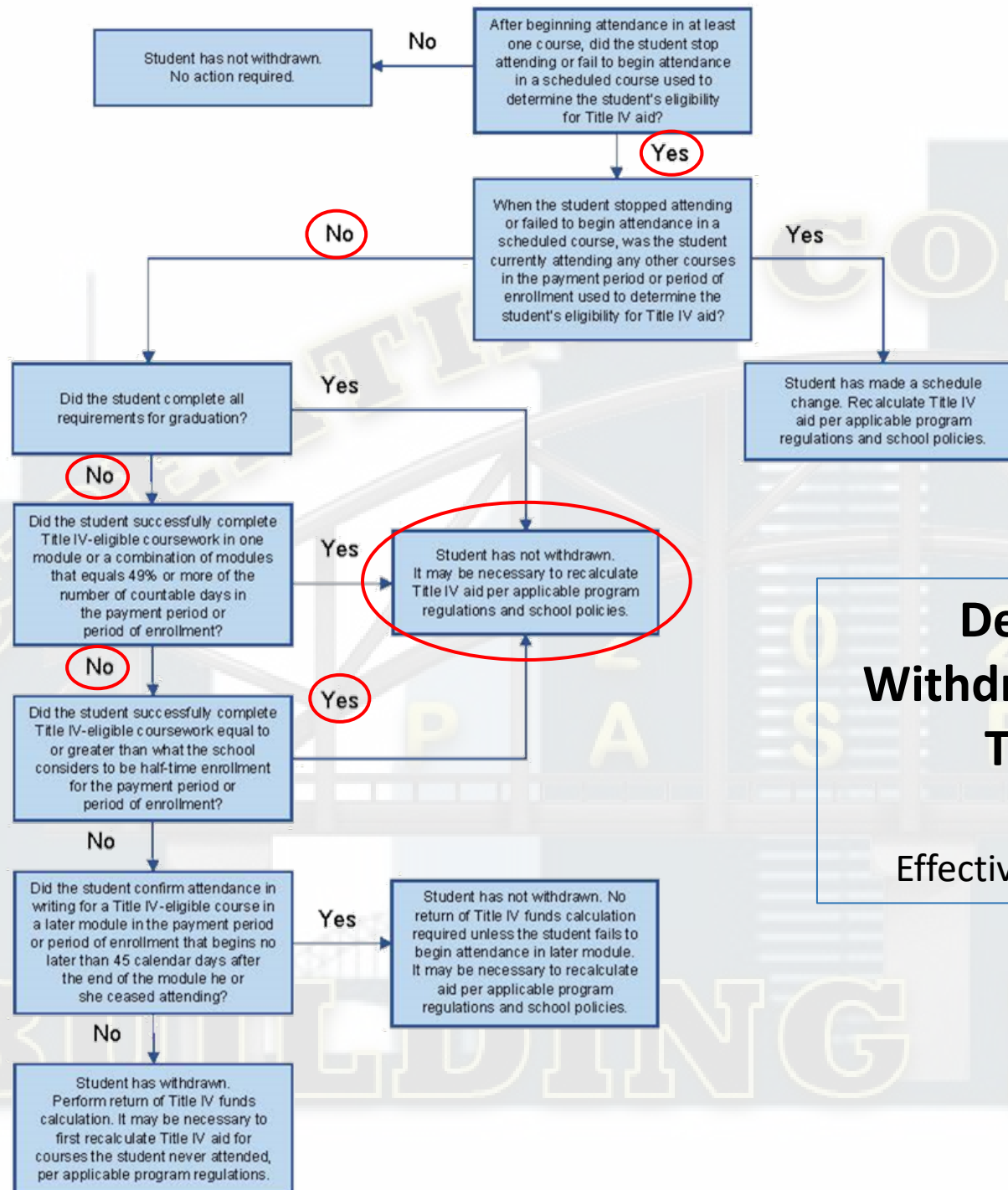
Mod 1: 6 credits
24 days

Break
3 days

Mod 2: 6 credits
24 days

Mod 3: 6 credits
24 days

Student was registered for 6 credits in each Module 3 and completes Module 1 with a passing grade in all 6 credits and drops from Module 2 during the one week of Module 2. The student is not in a full semester course.



Determining Whether a Student Has Withdrawn from a Standard- or Nonstandard Term Program Offered in Modules

Effective July 1, 2021, with Possible Early Implementation

R2T4 Denominator: Days Scheduled to Attend

- 668.22(l)(9): “A student in a program offered in modules is scheduled to complete the days in a module if the student’s coursework in that module was **used to determine the amount of the student’s eligibility for Title IV funds** for the payment period or period of enrollment.”
- This is a significant change as previous regulations required schools to use all days the student was scheduled to attend, even if the student did not begin attendance in a module.

R2T4 Denominator: Days Scheduled to Attend

- Only exclude scheduled breaks of five or more consecutive days
- Exclude breaks that occur after the student is no longer enrolled during the period
- Exclude breaks that, when combined with a module the student is not schedule to attend, become five or more consecutive days
- Do not exclude breaks of less than five days, such as days between modules

R2T4 Denominator: Days Scheduled to Attend

School has two options to determine number of days student was scheduled to complete in the period that contains modules:

1. **No R2T4 Freeze Date:** Using student's enrollment status that was eventually used to determine amount of student's Title IV aid for the period. Adding and dropping classes throughout the period could cause the number of days to change up until the student's withdrawal
2. **R2T4 Freeze Date:** Using student's enrollment schedule at a fixed point based on registration/enrollment practices of most students

R2T4 Denominator: No R2T4 Freeze Date

- Must determine number of days student was scheduled to complete in the period by looking at the coursework used to determine the amount of the student's Title IV aid eligibility for the period
- Must include all days in a module in R2T4 denominator if the student:
 - Attended at least one day in the module; or
 - Did not attend at least one day in the module, but the module was eventually included when determining the Title IV aid amount
- Types of aid the student receives may affect number of days used in R2T4 Calculation

R2T4 Denominator: Example 1

106-Day Semester		
53-Day Session	3-Day Break	50-Day Session

Student registered for one 3-credit course in Session I and one 3-credit course in Session II. Student is awarded a half-time disbursement of Pell and no other Title IV. Student drops 25 days into Session I.

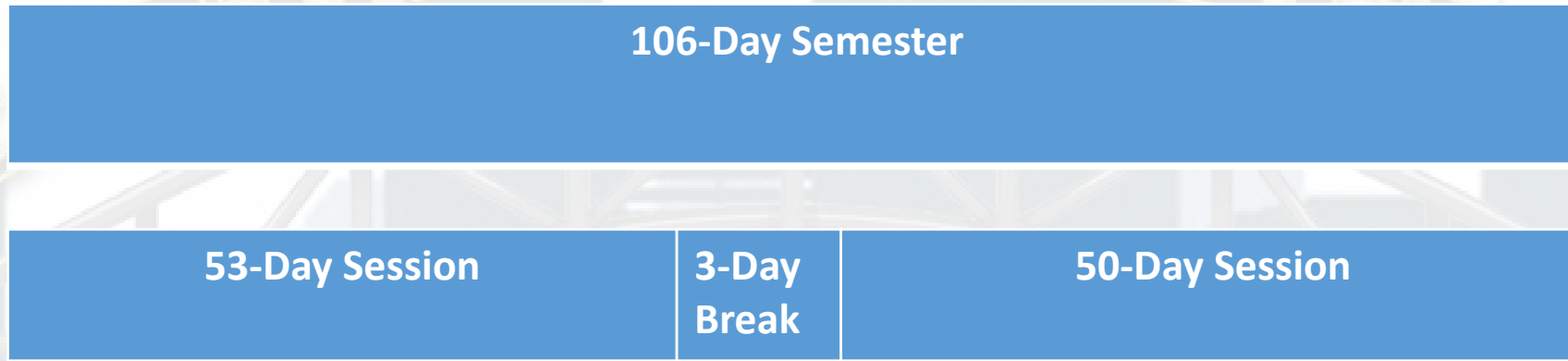
How many days are used in the denominator of the R2T4 calculation?

R2T4 Denominator: Example 1

Since the school is required to complete a Pell recalculation and the Pell is reduced to less than half time, only the 50 days in Session 1 will be included in the denominator of the R2T4 calc.

$$25/53 = 47.2\%$$

R2T4 Denominator: Example 2



Student registered for one 3-credit course in Session I and one 3-credit course in Session II. Student is awarded a half-time disbursement of Pell and Direct Loans. Student completes Session I and drops prior to Session II. How many days are used in the denominator of the R2T4 calculation?

R2T4 Denominator: Example 2

The school must perform a Pell recalculation and reduce the Pell amount to less than half time. However, since the student received Federal Direct Loans, the full 106 days will be used in the denominator of the R2T4 calculation.

$$50/106 = 47.2\%$$

Written Confirmation of Future Attendance

- Not considered a withdrawal if:
 - For a non-term program, school obtains written confirmation from student at the time that would have been a withdrawal:
 - Indicating date, he/she/they will resume attendance; and
 - That date is no later than 60 calendar days after student ceased attendance
 - For a subscription-based program, school obtains written confirmation from student at time that would have been a withdrawal:
 - Indicating date, he/she/they will resume attendance; and
 - That date occurs within the same period and is no later than 60 calendar days after the student ceased attendance.

Written Confirmation of Future Attendance

- In standard-term and nonstandard-term program offered in modules, excluding subscription-based program, not considered a withdrawal if:
 - School obtains written confirmation from student at the time that would have been withdrawal of the date he/she/they will attend a module that begins later in the same period; and
 - That module begins no later than 45 calendar days after end of module the student ceased attending
 - Old requirement with a new timeframe

Academic Engagement

Current Regulations

- No definition of academic engagement in regulation
- R2T4 regulation in 34 CFR 668.22 set requirements for activities that may be considered “academic attendance” or “attendance at an academically-related activity”
 - Used as the basis for establishing a student’s withdrawal date
 - Pertain only to 34 CFR 668.22

Academic Engagement

- Most of 34 CFR §668.22(l)(7) relating to requirements for academic attendance and attendance at academically-related activities was incorporated into a definition of “academic engagement” under 34 CFR part §600
 - Applicable to R2T4 and other applications within 34 CFR part §600 and 34 CFR part §668
 - Specifies that academic engagement includes interactive tutorials or webinars
 - Clarifies that merely logging into a class or online tutorial is not academic engagement

Clock Hours

- 50 to 60 minutes in a 60-minute period of attendance in a synchronous or asynchronous class, lecture, or recitation where there is opportunity for direct interaction between the instructor and students; or an asynchronous learning activity involving academic engagement in which the student interacts with technology that can monitor and document the amount of time that the student participates in the activity.
 - Clarifies that programs offered via distance education may be measured in clock hours
 - Requires that institutions be capable of monitoring a student's participation during 50 out of 60 minutes in each hour

Credit Hours Definition

- An amount of student work defined by an institution, as approved by the institution's accrediting agency or state approval agency, that is consistent with commonly accepted practice in postsecondary education
- Reasonably approximates not less than
 - One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different period of time; or
 - At least an equivalent amount of work as required in paragraph (1)(i) of this definition for other academic activities as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours
- May take into account a variety of delivery methods, measurements of student work, academic calendars, disciplines, and degree levels

Distance Education

- Definition refers to “the instructor or instructors” rather than simply “the instructor”
- Defines an instructor as an individual responsible for delivering course content and who meets the qualifications for instruction established by the institution’s accrediting agency
- Eliminates references to the various types of media described under the current definition, e.g., DVDs, CD-ROMs etc., and replaces those references with the phrase “other media”

Distance Education

- Substantive interaction would be defined under distance education as engaging students in teaching, learning, and assessment, consistent with the content under discussion, and including two of the following:
 1. Providing direct instruction
 2. Assessing or providing feedback on a student's coursework
 3. Providing information or responding to questions about the content of a course or competency
 4. Facilitating a group discussion regarding the content of a course or competency, or
 5. Other instructional activities approved by the Institution's or program's accrediting agency

Distance Education

Regular interaction

- Institutions must ensure regular interaction between a student and an instructor or instructors
 - Prior to the student's completion of a course or competency, provide the opportunity for substantive interactions with the student on a predictable and regular basis commensurate with the length of time and the amount of content in the course or competency
 - Monitor the student's academic engagement and success and ensure that an instructor is responsible for proactively engaging in substantive interaction with the student when needed, or upon request by the student

Program Participation Agreement (Clock Hours)

Reasonable relationship between program length and entry level requirements:

- Considered reasonable if the number of clock hours in the program does not exceed the greater of:
 - One hundred and fifty percent (150%) of the minimum number of clock hours required for training in the recognized occupation for which the program prepares the student, as established by the state in which the institution is located, if the state has established such a requirement, or as established by any federal agency; or
 - The minimum number of clock-hours required for training in the recognized occupation for which the program prepares the student as established in a state adjacent to the state in which the institution is located

Thank you!
Any Questions??



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