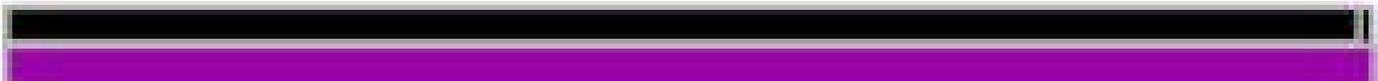




Electronic Access Conference

2002

THE U.S. Department of
EDUCATION





Return of Title IV Funds Updates and Overview of Version 1.1.1 Software



Agenda

- **Regulatory Updates**
- **Software Demo**
- **Questions?**



Regulatory Updates

- Negotiated Rulemaking
- NPRM – August 8, 2002
- Final – by November 1, 2002
 - Post-withdrawal disbursement timeframe
 - Institution required to take attendance
 - Leave of absence



Final Regulations - Return to Title IV (R2T4)

- Post-withdrawal disbursement (PWD) timeframe
 - When student or parent submits a timely response instructing the institution to make all or a portion of the PWD, the institution **MUST** disburse the funds within 120 days (new - increased from 90 days). 34 CFR 668.22(a)(4)(ii)(B)



Final Regulations

- Definition of “an institution that is required to take attendance.”
 - “An institution is required to take attendance if an outside entity (such as the institution’s accrediting agency or State agency) has a requirement, as determined by the entity, that the institution take attendance.”



“Required to take attendance”

- ONLY if outside entity specifically requires attendance taking
- Census taking -
 - If it is a “one-day snap-shot” the institution does not meet “required to take attendance” definition
 - Likewise, if outside entity does not consider its requirement to necessitate an institution to take attendance continuously for even a limited period, then institution not “required to take attendance”



“Required to take attendance”

- Census taking – (continued)
 - If the outside entity DOES consider its requirement to necessitate an institution to take attendance continuously for even a limited period, then the institution meets the definition of “required to take attendance” and, therefore, the last date of attendance (LDA) would be the “withdrawal date” used in the R2T4 determination.



“Required to take attendance”

- EXAMPLE #1: Institution A’s state agency requires it to take attendance for only the first 10 days of the term. This is considered a census period for the purpose of state grants.
- QUESTION: Would this institution meet the definition of “an institution that is required to take attendance”?



“Required to take attendance”

■ ANSWER: for Institution A –

- YES ! This is considered an institution required to take attendance for the first 10 days of class.
- For any students who withdraw during this limited period of required attendance taking, the institution must use the last date of attendance from its attendance records as the withdrawal date.
- For any students who withdraw after the limited period, the institution would meet the definition of “an institution NOT req’d to take attendance” (see 34 CFR 668.22(c))



“Required to take attendance”

■ EXAMPLE #1 – continued

- For a student where the institution could document that the student had academically-related activity after the period of required attendance taking -
 - If the student unofficially withdrew = midpoint
 - If the student followed the withdrawal policy = date the student either started the official WD policy or date he/she otherwise indicated intent to WD;
 - NOTE: The institution may always use the date of the academically-related activity as documented by the institution.



“Required to take attendance”

- EXAMPLE #2: Institution B awards aid from an outside entity where that outside entity requires a census “snap-shot” at the end of the first 10 days of scheduled class for all in-state students.
- QUESTION: Does this institution meet the definition of “an institution required to take attendance”?



“Required to take attendance”

- ANSWER: for Institution B. – It depends . . .
 - If the outside entity requires continuous attendance taking, then Institution B meets the definition of “an institution required to take attendance” for the duration of the limited period.
 - If the outside entity imposes census taking but does not require the institution to take attendance continuously or it does not consider census taking to require continuous attendance taking for the limited period, then Institution B meets the definition of “an institution not required to take attendance”.



Leave of absence

- **NEW RULE** - The number of days in an approved leave of absence (LOA), when added to the number of days in all other approved LOAs **CANNOT EXCEED 180** days in any 12-month period.



Leave of absence

■ EXAMPLE #1:

- Student has LOA approved for Jan – Feb, medically-related
- Student is selected for jury duty – total of 30 days (March)
- Student’s mother needs student to fill-in for her in the family business for 91 days

QUESTION: How does this differ from the previous guidance on approved LOAs?



Leave of absence

- ANSWER: Under the previous regulations, while the third request (to fill-in for mom) was due to unforeseen circumstances that request for a leave would not be permitted because it exceeds 30 days.
- Under the new final regulations, the third request could be made, as long as the time was limited to 90 days, so in total the number of days would not exceed 180 days within a 12-month period.



Leave of absence

- Institution's formal policy for LOA must;
 - Be in writing and publicized, (no change);
 - Requires students to provide a written, signed and dated request , THAT INCLUDES THE REASON FOR THE REQUEST, prior to the LOA. (Reason for request is NEW!)



Leave of absence

- Student can return prior to the scheduled end of the LOA for preparatory purposes –
 - As long as two conditions are met
 - No New Institutional Charges
 - No new Title IV aid



Leave of absence

- Term-based programs
 - LOA = temporary suspension of program, student must complete term to complete the payment period
 - No new institution charges and no new TIV aid
- Nonterm-based programs – (new)
 - New 34 CFR 668.4, Payment Period definition- period of time student completes both $\frac{1}{2}$ the credits and $\frac{1}{2}$ # of weeks of the AY
 - For Clock-hour – student must complete $\frac{1}{2}$ the # of clock hours in the program.



Leave of absence

- Nonterm-based programs – (new)
 - Student can start at the same point in the program where he/she stopped as a result of the LOA, or
 - Student can begin a new course (within the program) as long as there there is no additional charge but cannot complete the Payment Period until both $\frac{1}{2}$ the credits and $\frac{1}{2}$ the # of weeks are completed for which the student was previously paid TIV funds.



Re-entry w/in 180 days

- Changes to 34 CFR 668.4 (e)
- Applicable to nonterm and clock-hour programs only –
 - If a student withdraws and re-enters THE SAME PROGRAM w/in 180 days
 - The student remains in the same Payment Period
 - Student is eligible to receive TIV funds previously eligible to receive, INCLUDING funds returned to the program via R2T4.



Re-entry w/in 180 days

- **EXAMPLE #1:** - Student starts program, then withdraws (WD), then re-enters same program w/in 180 days, finally withdraws again.
- **QUESTION:** – How does the institution perform the Return calculation?
 - The institution calculates the unearned portion of TIV and returns the funds it is responsible to return to the program for the initial WD
 - If the student returns to same program w/in 180 days of the first WD, he/she returns to the same Payment Period and any TIV funds are restored.
 - When the student WD's again, a second R2T4 calculation is performed.



Re-entry w/in 180 days

- QUESTION: – Since the student may re-enter the same program within 180 days of the withdrawal date, may the institution delay performing the initial R2T4 calculation and returning any funds that the institution is required to return to the TIV programs until after the 180 days has past???
- ANSWER: – NO. 34 CFR 668.22(j) requires the institution to return unearned funds AS SOON AS POSSIBLE, but no later than 30 days after the date of the institution's determination of WD.



Re-entry w/in 180 days

- EXAMPLE #2: - Student re-enters w/in 180 days into the same program BUT after the start of a new award year
 - If the original determination made by the institution was that there was no cross-over award year, upon the student's re-entry, the student remains in the original award year
 - If the institution originally determined that there was a cross-over payment period, the institution would have determined the appropriate AY from which to make payment – when the student re-enters, payment is made out of the originally determined AY



Re-entry w/in 180 days

- EXAMPLE #3: - Student re-enters w/in 180 days into the same program BUT after the start of a new award year and more than 6 months of the program will occur in the second award year.
 - While the provisions of 34 CFR 690.64(a)(3) require that Pell be placed in the award year in which the 6 months occurs, the original determination of the institution would apply (see previous slide)



Re-entry after 180 days

- If a student re-enters the same program after 180 days from the withdrawal date; or re-enters a different program (regardless of the number of days from the initial WD) at either the same or another institution – the student begins a new Payment Period.



Death of an enrolled student

- Follow these steps -
 - A Return calculation Is required
 - If the results of the calculation indicate that the institution owes unearned funds to the program, the institution **MUST** return those TIV funds
 - No return is due from the student's estate
 - A post-withdrawal disbursement **MAY NOT** be made
 - Do not report to NSLDS, no referral to ED
 - Notify estate of cancellation benefits



Customer Service

- ED Customer Service
 - Types of questions handled:
 - ALL Guidance and Policy
 - Federal Calculation/NPRM questions
 - Please call: 1-800-433-7327



Software-Setup

- Program Institutional Charges
 - Define Institutional Charges the Student will actually incur
 - 3 defined components
 - Tuition and Fees
 - Room
 - Board
 - Can add additional items at setup or tab level
 - Can leave set to zero and then modify at record level

Sample Program Institutional Charges Setup

Program Institutional Charges [X]

User Modified: SYSADMIN Date Modified: 09/18/2002

Institutional Charges Code:

Year:

Program Title:

Program Type:

Description	Amount
TUITION AND FEES	\$ 0.00
ROOM	\$ 0.00
BOARD	\$ 0.00

Total:

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Sample School Calendar Profile Setup

School Calendar Profile [X]

User Modified: SYSADMIN Date Modified: 09/18/2002

School Information

School Calendar Profile Title: FALL 2002 ALL STUDENTS

School Calendar Profile Code: FALL02

Institutional Charges Code: FALL02 ...

Credit Hour Program:

Clock Hour Program:

Payment Period:

Period of Enrollment:

Payment Period or Period of Enrollment Start Date: 09/01/2002 [12] [ESC]

Payment Period or Period of Enrollment End Date: 12/31/2002 [12] [ESC]

Year: 2003 [v]

Total Clock Hours in Period Selected: []

Number of Days in the Payment Period: 122

Number of Allowable Break Days: 0

Net Days in the Payment Period: 122

Scheduled Break Days

Starting Date	Ending Date	Description

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Add Delete Save Retrieve...

OK Cancel Help



Software/Tabs

■ Tabs

– Demo Tab

- Required fields

– R2T4 Tab

- 2000-2010
- Unique key

- Year, Original SSN, School Calendar Profile Code



Software/Tabs

- Post Withdrawal Tab
 - Step 4 E > \$0
- Notes Tab
- User Data Tab
 - 4 pre-defined fields
 - GPA
 - Major
 - Over Payment Status
 - Withdrawal Reason



Software/Reports

■ Reports

– Tab

- Return of Title IV Funds Worksheet
- Return of Title IV Funds Notes
- Return of Title IV Funds Summary
- Post-Withdrawal Disbursement Tracking Sheet
- Print All



Software/Reports

- Global
 - Student Listing
 - Return Arrangements
 - Students To Be Notified Report
 - Students Notified Report
 - School Return Arrangement Report
 - » Arrangement Status 1-6 (All)



Customer Service

- CPS/WAN Technical Support
 - Types of Questions handled:
 - Installations
 - Setup
 - Entry
 - Print
 - 800-330-5947



QUESTIONS ???

Questions ?????

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Your presenters

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