WEBVTT

00:00:06.971 --> 00:00:16.971

00:00:16.971 --> 00:00:26.981

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00:02:26.981 --> 00:02:36.981

00:02:46.631 --> 00:02:46.981

00:02:47.001 --> 00:02:50.531

Good morning or good afternoon depending on where you are.

00:02:50.531 --> 00:02:53.711

Welcome to the last of three webinars presented.

00:02:53.711 --> 00:02:56.991

by the Office of Postsecondary Education these.

00:02:56.991 --> 00:03:00.401

webinars provide an overview of the changes to the regulatory.

00:03:00.401 --> 00:03:03.571

requirements included in the distance education.

00:03:03.571 --> 00:03:06.621

and Innovation Regulations which were published.

00:03:06.621 --> 00:03:09.811

on September 2nd of 2020 and.

00:03:09.811 --> 00:03:13.191

have an effective date of July 1 of 2021.

00:03:13.191 --> 00:03:16.491

each webinar. Our address is a separate.

00:03:16.491 --> 00:03:18.951

set of topics from these regulations.

00:03:19.071 --> 00:03:22.761

And today's webinar will address subscription based programs.

00:03:22.761 --> 00:03:22.761

00:03:23.311 --> 00:03:26.441

This session will be recorded and a recording.

00:03:26.441 --> 00:03:29.501

of these sessions will be provided in a future.

00:03:29.501 --> 00:03:32.711

announcement on FSA Partners Dot Ed Dot gov.

00:03:32.711 --> 00:03:36.121

meanwhile, you can access today's.

00:03:36.121 --> 00:03:39.431

Powerpoint presentation by going to the link provided.

00:03:39.431 --> 00:03:42.541

on your screen, then scroll all the way to.

00:03:42.541 --> 00:03:45.681

the end to find this session today.

00:03:45.681 --> 00:03:49.101

s webinar will be in listen only mode.

00:03:49.101 --> 00:03:52.121

You will be able to ask questions through the Q and.

00:03:52.121 --> 00:03:55.561

feature by clicking on the Q& A icon.

00:03:55.561 --> 00:03:55.561

00:03:55.621 --> 00:03:58.731

At the top right corner of your webinar screen.

00:03:58.731 --> 00:04:02.011

at as time permits, we will.

00:04:02.011 --> 00:04:05.051

conclude the web and are with a Q& A session.

00:04:05.051 --> 00:04:05.051

00:04:05.921 --> 00:04:09.291

Today's webinar will be presented by David Musser of Federal.

00:04:09.291 --> 00:04:12.381

Student Aid, and Greg Martin of the Office of.

00:04:12.381 --> 00:04:15.551

Postsecondary Education. So now I will turn.

00:04:15.551 --> 00:04:17.131

it over to Dave.

00:04:19.741 --> 00:04:22.771

Thanks Natasha, and thanks to everyone who's joining us today.

00:04:22.771 --> 00:04:25.891

for the third and final webinar in our series on the September.

00:04:25.891 --> 00:04:27.691

2nd, 2020 regulations.

00:04:28.391 --> 00:04:31.641

This webinar is a continuation from our most recent presentations.

00:04:31.641 --> 00:04:34.811

on satisfactory academic progress and return of Title 4 funds.

00:04:34.811 --> 00:04:37.861

on April 12th and distance education and institutional.

00:04:37.861 --> 00:04:40.951

eligibility on April 26th. Today will cover.

00:04:40.951 --> 00:04:44.031

a new topic from the same set of regulations, but this time will.

00:04:44.031 --> 00:04:47.271

be looking at subscription based programs, a new type of program.

00:04:47.271 --> 00:04:50.181

and academic calendar introduced in those regulations.

00:04:51.781 --> 00:04:55.071

So here are two presenters for today. I'll be starting us off.

00:04:55.071 --> 00:04:58.301

My name is David Musser and I'm the director of the policy innovation.

00:04:58.301 --> 00:05:01.421

and Dissemination Group at the Federal at the Office of Federal Student.

00:05:01.421 --> 00:05:04.661

Aid, and I'm here with Greg Martin, director of the policy.

00:05:04.661 --> 00:05:07.651

Development Group in the Office of Postsecondary Education.

00:05:10.211 --> 00:05:12.351

So let's start by going through our agenda for today.

00:05:12.911 --> 00:05:16.541

We'll start out with a brief introduction of the September 2nd regulations.

00:05:16.541 --> 00:05:19.761

and then spend some time explaining what a subscription period is.

00:05:19.761 --> 00:05:23.381

and why you might want to use it. Then we'll discuss the characteristics.

00:05:23.381 --> 00:05:26.421

of subscription based academic calendars and move into a.

00:05:26.421 --> 00:05:29.621

fairly lengthy discussion of the requirements for students to complete.

00:05:29.621 --> 00:05:33.181

coursework in these programs. In order to receive subsequent subsequent.

00:05:33.181 --> 00:05:34.871

disbursements of title IV aid.

00:05:35.491 --> 00:05:38.501

Finally, will explain how satisfactory academic progress.

00:05:38.501 --> 00:05:41.601

return Title 4 funds and attendance requirements apply for these.

00:05:41.601 --> 00:05:44.741

programs and will walk you through some examples and at.

00:05:44.741 --> 00:05:47.841

the end will provide a few references for you to use if you have anymore questions.

00:05:47.841 --> 00:05:49.041

after the presentation.

00:05:51.781 --> 00:05:54.901

So these regulations were part of a negotiated rulemaking process that.

00:05:54.901 --> 00:05:58.241

began in 2018 and resulted in regulations that were published.

00:05:58.241 --> 00:06:01.581

on September 2nd, 2020. The rules become effective.

00:06:01.581 --> 00:06:04.291

for all institutions on July 1st, 2021.

00:06:05.341 --> 00:06:08.411

It's worth noting that institutions have the option of early implementing.

00:06:08.411 --> 00:06:11.431

summer. All of the regulations at their discretion now if.

00:06:11.431 --> 00:06:14.631

you decide to early implement any of these provisions, it's a good practice.

00:06:14.631 --> 00:06:17.711

to clearly document your institution's decision and the date that it.

00:06:17.711 --> 00:06:21.371

was made, including a statement signed by someone at your institution.

00:06:21.371 --> 00:06:24.591

with the authority to make these types of decisions but department.

00:06:24.591 --> 00:06:27.631

does not have any specific rules about how to document your decision.

00:06:27.631 --> 00:06:29.421

to implement regulations early.

00:06:30.121 --> 00:06:33.171

Additionally, because the use of subscription based academic calendars.

00:06:33.171 --> 00:06:36.411

is entirely optional, as we'll discuss in a moment, but July.

00:06:36.411 --> 00:06:39.641

1st implementation date does not create any new requirements.

00:06:39.641 --> 00:06:42.791

for these rules, unless schools choose to offer subscription.

00:06:42.791 --> 00:06:43.771

based programs.

00:06:46.361 --> 00:06:49.421

So let's start at the beginning. What is a subscription based?

00:06:49.421 --> 00:06:52.571

program? So this will probably be a new concept for most.

00:06:52.571 --> 00:06:55.611

of you, so we're going to take some time to describe what these programs.

00:06:55.611 --> 00:06:58.871

are and what the regulatory requirements apply.

00:06:58.871 --> 00:07:01.241

for you to offer them for Title 4 purposes.

00:07:03.961 --> 00:07:07.661

So when we think about term based programs, we tend to think about, establish, start and.

00:07:07.661 --> 00:07:11.041

end dates for coursework. In fact, that goes to the very essence.

00:07:11.041 --> 00:07:12.531

of what a term is.

00:07:13.121 --> 00:07:16.411

The title for programs have similar rules for term based programs.

00:07:16.411 --> 00:07:19.621

than for non term programs in large part because the time frame.

00:07:19.621 --> 00:07:22.011

for each course in these programs is fixed.

00:07:22.881 --> 00:07:26.151

But in recent years it's become easier to offer programs that are self.

00:07:26.151 --> 00:07:29.251

paced where students have greater control and flexibility over.

00:07:29.251 --> 00:07:32.531

the time and place that they pursue coursework additionally.

00:07:32.531 --> 00:07:36.011

schools have become more creative about when and how they offer courses.

00:07:36.011 --> 00:07:36.011

00:07:36.571 --> 00:07:39.751

An example of that is the incorporation of modules into more and more.

00:07:39.751 --> 00:07:43.181

terms and innovation that we discussed in great detail in our earlier.

00:07:43.181 --> 00:07:45.181

webinar on Return of Title 4 funds.

00:07:46.151 --> 00:07:49.171

Some schools have taken that innovation even further and have begun.

00:07:49.171 --> 00:07:52.291

charging students for a defined period of calendar time without.

00:07:52.291 --> 00:07:55.651

reference to the specific courses or competencies that the student is working.

00:07:55.651 --> 00:07:58.771

on during that time frame. These sorts of programs.

00:07:58.771 --> 00:08:02.871

have been commonly described as subscription based students, essentially.

00:08:02.871 --> 00:08:06.371

subscribes to receive certain instruction, certain instructional.

00:08:06.371 --> 00:08:10.051

services for a school, and they are allowed to work on the coursework that they.

00:08:10.051 --> 00:08:12.161

choose during that time period.

00:08:14.881 --> 00:08:18.511

The department created specific requirements for subscription based programs.

00:08:18.511 --> 00:08:21.721

in an effort to accommodate some of these characteristics, including.

00:08:21.721 --> 00:08:25.141

the flexibility that students have to work on the coursework at work on.

00:08:25.141 --> 00:08:27.331

their coursework at the time of their choosing.

00:08:28.181 --> 00:08:31.771

So the second bullet on this slide is really important subscription.

00:08:31.771 --> 00:08:34.871

programs, maybe competency based, but that's not actually.

00:08:34.871 --> 00:08:38.711

a requirement. Many of the first subscription based programs.

00:08:38.711 --> 00:08:41.911

were in fact competency based, but the subscription based.

00:08:41.911 --> 00:08:45.011

framework could be used in other kinds of programs, the.

00:08:45.011 --> 00:08:48.111

two things are not the same, and programs using traditional.

00:08:48.111 --> 00:08:51.371

instructional methods like in class instruction could also qualify.

00:08:51.371 --> 00:08:54.491

as subscription based programs. There's no particular.

00:08:54.491 --> 00:08:57.541

restriction on the type of modality that schools use to offer.

00:08:57.541 --> 00:08:59.381

subscription based programs either.

00:08:59.631 --> 00:09:02.731

They could be offered on campus through distance education or.

00:09:02.731 --> 00:09:04.291

using correspondence courses.

00:09:07.191 --> 00:09:10.281

So subscription based programs will be defined in 30.

00:09:10.281 --> 00:09:13.441

CFR 668.2, and that's where you can.

00:09:13.441 --> 00:09:16.681

find all of the specific regulatory requirements for using.

00:09:16.681 --> 00:09:20.011

a subscription based academic calendar for Title 4 purposes.

00:09:20.011 --> 00:09:23.241

The major requirements are all on this slide, but bear.

00:09:23.241 --> 00:09:26.321

with me because I'm going to dig into each of these in more detail in just.

00:09:26.321 --> 00:09:29.711

a moment. A subscription based program is a standard.

00:09:29.711 --> 00:09:33.021

or non standard term program. It charges a student.

00:09:33.021 --> 00:09:36.111

for each term on a subscription basis, with the expectation that.

00:09:36.111 --> 00:09:39.511

the student completes a specified number of credit hours or the equivalent.

00:09:39.511 --> 00:09:40.461

during that term.

00:09:41.071 --> 00:09:44.421

It does not require coursework to begin or end within the.

00:09:44.421 --> 00:09:47.851

established term dates. And finally it's associated.

00:09:47.851 --> 00:09:50.861

with a single enrollment status. For example full time.

00:09:50.861 --> 00:09:54.321

or half time that applies to a student throughout the program.

00:09:54.321 --> 00:09:54.321

00:09:57.601 --> 00:10:01.461

So I want to pause here to explain something I mentioned earlier treating.

00:10:01.461 --> 00:10:04.511

a program as a subscription based program is totally optional.

00:10:04.511 --> 00:10:07.651

You never have to use this format to offer your programs.

00:10:07.651 --> 00:10:10.761

Subscription based programs can always be offered using a non.

00:10:10.761 --> 00:10:14.021

term academic calendar which shares many characteristics.

00:10:14.021 --> 00:10:15.551

with subscription based programs.

00:10:16.161 --> 00:10:19.351

Additionally, some schools might use subscription pricing, but.

00:10:19.351 --> 00:10:22.561

still require courses to start and end within established.

00:10:22.561 --> 00:10:25.811

fixed term dates. In that case, the program would not.

00:10:25.811 --> 00:10:29.021

be considered subscription based and instead the normal rules.

00:10:29.021 --> 00:10:32.351

for traditional term based programs would apply where.

00:10:32.351 --> 00:10:35.731

aware of several institutions that have made this approach work in competency.

00:10:35.731 --> 00:10:39.151

based programs by requiring students to decide on the competencies.

00:10:39.151 --> 00:10:42.301

that they'll work on as the period starts and then demonstrate.

00:10:42.301 --> 00:10:45.671

that they've mastered those competencies by the end of the subscription period.

00:10:45.671 --> 00:10:45.671

00:10:46.231 --> 00:10:49.421

Those programs are not required to use the subscription.

00:10:49.421 --> 00:10:52.471

based academic calendar and are not subject to any of.

00:10:52.471 --> 00:10:55.541

the disburssement limitations that Greg is going to explain in just.

00:10:55.541 --> 00:10:59.081

a few minutes. Those are considered traditional term based programs.

00:10:59.081 --> 00:11:02.301

because the course work starts and ends in this in the same term.

00:11:02.301 --> 00:11:02.301

00:11:05.171 --> 00:11:08.311

So remember we said before that subscription based programs are term.

00:11:08.311 --> 00:11:11.751

based programs and it really is that simple a subscription.

00:11:11.751 --> 00:11:14.791

period is either a standard term or a non standard term.

00:11:14.791 --> 00:11:18.251

Subscription period is synonymous with term and payment period.

00:11:18.251 --> 00:11:21.761

and we're going to use those terms interchangeably throughout this presentation.

00:11:21.761 --> 00:11:21.761

00:11:22.591 --> 00:11:25.641

So it follows that each subscription period is subject to all of.

00:11:25.641 --> 00:11:29.181

the requirements for terms, including requirements for standard terms.

00:11:29.181 --> 00:11:32.301

So for example, a subscription period and a program using.

00:11:32.301 --> 00:11:35.641

semesters must be between 4 and 21 weeks of instruction.

00:11:35.641 --> 00:11:38.661

you under the department's revised term length guidance.

00:11:38.661 --> 00:11:41.521

in the November 5th, 2019 electronic announcement.

00:11:42.461 --> 00:11:45.661

So each subscription period is also subject to all the requirements.

00:11:45.661 --> 00:11:49.491

for calculating full time enrollment and within those requirements.

00:11:49.491 --> 00:11:52.731

institutions can define enrollment status as they would with any.

00:11:52.731 --> 00:11:55.881

other type of term based program. Similarly, the.

00:11:55.881 --> 00:11:59.051

rules the normal rules for the use of SAY, BBAY.

00:11:59.051 --> 00:12:02.391

One, or BBAY two apply for direct loans as.

00:12:02.391 --> 00:12:05.431

to the requirements for Pell Grant formulas 1,2 and three each of.

00:12:05.431 --> 00:12:07.761

which also applied to term based programs.

00:12:08.391 --> 00:12:11.421

The big difference here between subscription periods in traditional.

00:12:11.421 --> 00:12:15.261

terms is that there are no modules and subscription based programs.

00:12:15.261 --> 00:12:18.561

Students are always treated as being enrolled throughout the subscription.

00:12:18.561 --> 00:12:19.661

period or term.

00:12:20.231 --> 00:12:23.531

The big difference is the requirement for the completion of credits, which will discuss.

00:12:23.531 --> 00:12:25.371

a little bit later in the presentation.

00:12:28.371 --> 00:12:32.161

Now, one of the most important requirements for subscription based programs.

00:12:32.161 --> 00:12:35.441

is related to the way students or charge for tuition and fees.

00:12:35.441 --> 00:12:38.641

in subscription based programs. Students must always.

00:12:38.641 --> 00:12:41.841

be charged a flat rate for tuition and fees for each subscription.

00:12:41.841 --> 00:12:44.891

period. The regulations do not prescribe how much.

00:12:44.891 --> 00:12:47.941

a student is charged, but they always require the charge to.

00:12:47.941 --> 00:12:49.171

be a single rate.

00:12:49.971 --> 00:12:53.441

Now that said, there are some important exceptions to that general rule.

00:12:53.441 --> 00:12:56.541

First, if a school offered subscription periods of.

00:12:56.541 --> 00:12:59.561

varying lengths in the same program, it's permitted to.

00:12:59.561 --> 00:13:02.871

charge different amounts based on the length of the term for.

00:13:02.871 --> 00:13:06.521

example, at the school charged $1000 for a 10 week period.

00:13:06.521 --> 00:13:09.561

it could also charge the $1500 for a 15.

00:13:09.561 --> 00:13:12.701

week period given the additional time and instructional resources.

00:13:12.701 --> 00:13:15.661

that would be associated with those additional weeks of instructional time.

00:13:16.601 --> 00:13:19.841

Additionally, charges can be different in different versions of the same.

00:13:19.841 --> 00:13:23.641

program we’ll explain this in more detail in a few slides.

00:13:23.641 --> 00:13:27.041

but for now, suffice to say that schools can offer different versions.

00:13:27.041 --> 00:13:32.161

of the same subscription based programs at different enrollment statuses, for example halftime.

00:13:32.161 --> 00:13:34.421

and full time versions of the same program.

00:13:35.101 --> 00:13:38.651

Schools are permitted to charge different amounts for these different versions.

00:13:38.651 --> 00:13:42.021

again to reflect the different institutional instructional.

00:13:42.021 --> 00:13:45.201

resources devoted to a student who is expected to complete full.

00:13:45.201 --> 00:13:48.501

time coursework. Each period and students who are expected to complete.

00:13:48.501 --> 00:13:51.541

only half time coursework each period. Here we.

00:13:51.541 --> 00:13:54.821

give another simple example where the school charges $1000.

00:13:54.821 --> 00:13:58.101

per subscription period for the halftime version of a program, and.

00:13:58.101 --> 00:14:01.701

$2000 per period for the full time version of the program.

00:14:01.701 --> 00:14:04.751

Now the last bullet here is perhaps the most important.

00:14:04.751 --> 00:14:05.611

on the slide.

00:14:05.931 --> 00:14:09.401

Charges for a program cannot vary based on the specific.

00:14:09.401 --> 00:14:12.521

number of courses or comments that the student is.

00:14:12.521 --> 00:14:15.561

working on during a specific period. That's what we mean.

00:14:15.561 --> 00:14:18.581

by a flat rate. In this you can't charge.

00:14:18.581 --> 00:14:21.701

charge based on the number of courses the student is actually working on.

00:14:21.701 --> 00:14:22.821

during the period.

00:14:26.091 --> 00:14:29.221

So those are some important restrictions on how you can charge.

00:14:29.221 --> 00:14:32.411

students in the subscription based program. But there are also some pretty.

00:14:32.411 --> 00:14:35.601

big flexibility's that come with those restrictions there.

00:14:35.601 --> 00:14:38.671

are no restrictions whatsoever on time frames when for.

00:14:38.671 --> 00:14:42.311

when students start and end coursework in a subscription based program.

00:14:42.311 --> 00:14:45.331

Courses or competencies can overlap with one another they.

00:14:45.331 --> 00:14:48.891

can overlap and they can overlap between different subscription periods.

00:14:48.891 --> 00:14:52.291

The flexibility is so great that it allows students enrolled.

00:14:52.291 --> 00:14:55.531

in subscription based programs to essentially take any coursework.

00:14:55.531 --> 00:14:57.011

in any modality.

00:14:57.071 --> 00:14:59.041

But of course over any time frame.

00:14:59.591 --> 00:15:03.021

The only restriction here is that this subscription periods themselves.

00:15:03.021 --> 00:15:06.051

can't overlap. This is similar to how terms can't.

00:15:06.051 --> 00:15:08.291

overlap in a traditional term based format.

00:15:11.591 --> 00:15:15.111

Now, if you attended our last presentation on distance education and institutional.

00:15:15.111 --> 00:15:18.351

eligibility, you might remember that we said that the distance education.

00:15:18.351 --> 00:15:21.441

requirements for regular and substantive interaction apply at the course.

00:15:21.441 --> 00:15:24.631

or competency level, not the program level that.

00:15:24.631 --> 00:15:26.931

applies for subscription based programs too.

00:15:27.501 --> 00:15:31.331

For each course are competent state that the institution treats this distance education.

00:15:31.331 --> 00:15:34.651

The institution must ensure regular and substantive interaction between.

00:15:34.651 --> 00:15:37.791

students and instructors. Check out that presentation for.

00:15:37.791 --> 00:15:39.741

more information about those requirements.

00:15:43.481 --> 00:15:46.951

Alright, so this slide explains another important aspect of subscription.

00:15:46.951 --> 00:15:50.391

based programs for title for purposes students.

00:15:50.391 --> 00:15:53.511

in subscription based programs always have the same enrollment.

00:15:53.511 --> 00:15:56.791

status. The school will use the same enrollment status.

00:15:56.791 --> 00:15:59.871

for every period in which the student enrolls, regardless.

00:15:59.871 --> 00:16:03.151

of the number of specific courses or conferences in which the student.

00:16:03.151 --> 00:16:06.271

actually enrolls during the term. And there's an exception to.

00:16:06.271 --> 00:16:09.391

this that will talk about for Pell Grant purposes when you.

00:16:09.391 --> 00:16:11.591

have to look at exactly what the student attended.

00:16:11.651 --> 00:16:13.221

But put that aside for a second.

00:16:14.221 --> 00:16:17.291

Along with this, the school needs to have a general expectation.

00:16:17.291 --> 00:16:20.321

that students complete coursework that's commensurate with their enrollment.

00:16:20.321 --> 00:16:23.361

status. So if your student is enrolled full time and

00:16:23.361 --> 00:16:26.391

you define full time, is 12 credits. Even if you give.

00:16:26.391 --> 00:16:29.431

the student a lot of flexibility about which courses they enroll.

00:16:29.431 --> 00:16:32.671

in an when they enroll, the student should still be expected.

00:16:32.671 --> 00:16:34.981

to complete at least 12 credits per term.

00:16:35.801 --> 00:16:39.231

Finally, you also need to document at least once per academic.

00:16:39.231 --> 00:16:42.291

year that your student actually intends to complete at.

00:16:42.291 --> 00:16:45.761

least half time coursework, and this is done by establishing.

00:16:45.761 --> 00:16:49.031

an academic plan for the student. For that period, the.

00:16:49.031 --> 00:16:52.191

department doesn't prescribe what an academic plan needs to include.

00:16:52.191 --> 00:16:55.731

or how it's established, but it needs to be in place to demonstrate.

00:16:55.731 --> 00:16:59.301

the students intent to take at least half time coursework if.

00:16:59.301 --> 00:17:02.491

a school can't document the students intent to complete at least half.

00:17:02.491 --> 00:17:06.521

time coursework, the student would not be eligible for direct loan funds.

00:17:06.521 --> 00:17:06.521

00:17:06.571 --> 00:17:09.681

And the school would need to exclude miscellaneous personal expenses.

00:17:09.681 --> 00:17:12.891

from the students. Cost of attendance, and they can only include room and board.

00:17:12.891 --> 00:17:16.021

from the students. Cost for a limited time. So it's important to have that.

00:17:16.021 --> 00:17:19.101

academic year academic plan in place so that.

00:17:19.101 --> 00:17:22.111

you can ensure and document the student is going to be attending at least.

00:17:22.111 --> 00:17:22.921

half time.

00:17:26.431 --> 00:17:29.531

Now, even though students may always have the same enrollment status in the.

00:17:29.531 --> 00:17:32.771

subscription based program, schools can offer different versions.

00:17:32.771 --> 00:17:37.711

of the same program that are associated with different enrollment. Status is, for example, an.

00:17:37.711 --> 00:17:41.391

institution could offer full time 3/4 time halftime and.

00:17:41.391 --> 00:17:44.511

less than half time versions of the same subscription based program.

00:17:44.511 --> 00:17:47.781

These are considered different programs for title.

00:17:47.781 --> 00:17:48.771

for purposes.

00:17:49.471 --> 00:17:52.781

In this case, each version of the program would have a different published.

00:17:52.781 --> 00:17:55.901

length. Each program has the same number of credits.

00:17:55.901 --> 00:17:59.051

so a student enrolled at a lesser enrollment status is necessarily.

00:17:59.051 --> 00:18:00.971

going to take more time to complete it.

00:18:01.811 --> 00:18:05.041

Transfers between versions of the same program are also not.

00:18:05.041 --> 00:18:08.111

considered withdrawals. That's important here because you don't want to have.

00:18:08.111 --> 00:18:11.141

to do a return of title for calculation every time a student switches.

00:18:11.141 --> 00:18:12.731

between these kinds of programs.

00:18:13.341 --> 00:18:16.741

It's worth noting here that for title for purposes a student remains.

00:18:16.741 --> 00:18:19.981

in the same enrollment status throughout the subscription period.

00:18:19.981 --> 00:18:23.221

and can only switch statuses in a new subscription period.

00:18:23.221 --> 00:18:23.221

00:18:24.211 --> 00:18:27.481

Now, perhaps most importantly, the credit completion requirements.

00:18:27.481 --> 00:18:30.661

for disbursement purposes are cumulative for students who transfer.

00:18:30.661 --> 00:18:33.741

between different programs, and Greg will explain a little bit more.

00:18:33.741 --> 00:18:35.711

about how that works in a few moments.

00:18:36.931 --> 00:18:40.601

So schools can offer different versions of the same subscription based program.

00:18:40.601 --> 00:18:44.161

and students can transfer between transfer between these different versions.

00:18:44.161 --> 00:18:47.691

in order to switch enrollment status from time to time, but.

00:18:47.691 --> 00:18:50.711

the regulations actually limit the number of transfers between.

00:18:50.711 --> 00:18:53.791

different versions of the same program in the subscription based.

00:18:53.791 --> 00:18:56.901

format, students are only permitted to switch between.

00:18:56.901 --> 00:18:59.921

different versions of the same program once per academic.

00:18:59.921 --> 00:19:02.961

year. Students cannot switch enrollment statuses each.

00:19:02.961 --> 00:19:06.181

term the same way that they can, and traditional term based programs.

00:19:06.181 --> 00:19:06.181

00:19:06.871 --> 00:19:10.161

Now, having said all this, I want to note that schools are not required.

00:19:10.161 --> 00:19:13.581

to have different versions of the same subscription based program if.

00:19:13.581 --> 00:19:16.711

you offer a subscription based program and you want to have only.

00:19:16.711 --> 00:19:19.781

a full time version of that program, that's fine, it's.

00:19:19.781 --> 00:19:22.801

just that all of your students will be expected to attend full time.

00:19:22.801 --> 00:19:23.981

in that program.

00:19:27.251 --> 00:19:30.771

And finally, just a few notes about program eligibility and reporting.

00:19:30.771 --> 00:19:34.131

Subscription based programs are subject to the exact same program.

00:19:34.131 --> 00:19:37.471

eligibility requirements as all other programs, including program.

00:19:37.471 --> 00:19:41.291

length and the requirement to offer a degree or other recognized credential.

00:19:41.291 --> 00:19:41.291

00:19:41.891 --> 00:19:45.061

There are currently no differences in program approval or.

00:19:45.061 --> 00:19:48.561

reporting requirements for subscription programs either, and.

00:19:48.561 --> 00:19:52.171

if an institution offers multiple versions of the same subscription program.

00:19:52.171 --> 00:19:55.441

they only have to report the one with the highest enrollment status.

00:19:55.441 --> 00:19:58.601

and the shortest published length on the E app, and that's.

00:19:58.601 --> 00:20:01.781

similar to the way that schools currently report full time and part time clock.

00:20:01.781 --> 00:20:02.721

hour programs.

00:20:03.311 --> 00:20:06.391

Finally, we included this bullet at the end because it's important.

00:20:06.391 --> 00:20:09.461

that you're going to that. Schools ensure that they use the correct.

00:20:09.461 --> 00:20:13.261

published length when they reported students enroll enrollment.

00:20:13.261 --> 00:20:16.441

to NSLDS. Since you might have multiple versions.

00:20:16.441 --> 00:20:19.681

of the same program, you're going to have to monitor which version the student is.

00:20:19.681 --> 00:20:22.701

in, and you're going to have to report the correct published length whenever.

00:20:22.701 --> 00:20:25.821

you do your enrollment reporting for students in subscription.

00:20:25.821 --> 00:20:26.871

based programs.

00:20:29.971 --> 00:20:33.181

OK, now let's talk about subscription based academic.

00:20:33.181 --> 00:20:34.751

calendars and how they work.

00:20:37.891 --> 00:20:41.441

So as most of you probably know, the department has traditionally recognized.

00:20:41.441 --> 00:20:44.681

three types of academic calendars standard term programs.

00:20:44.681 --> 00:20:47.371

non standard term programs, an non term programs.

00:20:48.031 --> 00:20:51.641

Each of those types of academic calendars is associated with certain characteristics.

00:20:51.641 --> 00:20:54.721

and requirements. For example, standard term programs.

00:20:54.721 --> 00:20:57.781

need to have a terms of a certain length, and they have to use semesters.

00:20:57.781 --> 00:21:00.901

trimesters or quarters, non standard term programs.

00:21:00.901 --> 00:21:04.261

can have terms of any length, but if the term links are not relatively.

00:21:04.261 --> 00:21:07.521

consistent, there can be. There can be some significant limitations.

00:21:07.521 --> 00:21:10.661

on how a school disperses title for aid in particular direct loan.

00:21:10.661 --> 00:21:12.461

funds, and I'll get into that in a second.

00:21:13.271 --> 00:21:16.581

Non term programs do not use terms at all and.

00:21:16.581 --> 00:21:19.701

in those programs, disbursement of title for aid is based.

00:21:19.701 --> 00:21:21.921

on a students progress through the program.

00:21:22.811 --> 00:21:25.901

Subscription based programs essentially comprise a fourth type of.

00:21:25.901 --> 00:21:29.591

academic calendar that can only be used in.

00:21:29.591 --> 00:21:33.081

when you have a subscription based academic calendar, so.

00:21:33.081 --> 00:21:36.521

if you offer a subscription based program, you have to use a subscription.

00:21:36.521 --> 00:21:39.821

based calendar, but you cannot use a subscription based calendar.

00:21:39.821 --> 00:21:42.851

in any other context, so it's tied to all.

00:21:42.851 --> 00:21:46.041

of the requirements that we just described about having a subscription.

00:21:46.041 --> 00:21:47.811

based program in the first place.

00:21:48.611 --> 00:21:50.631

Now, this last bullet is really important.

00:21:51.251 --> 00:21:54.381

Because the department treats each treats each subscription.

00:21:54.381 --> 00:21:57.421

period as a term subscription based programs are.

00:21:57.421 --> 00:22:01.001

subject to all of the requirements for term based programs except.

00:22:01.001 --> 00:22:04.761

the requirement for coursework to start and end within a specified time frame.

00:22:04.761 --> 00:22:04.761

00:22:07.221 --> 00:22:10.451

So before we go on, let me give you a bit more background about academic.

00:22:10.451 --> 00:22:13.631

terms in general and I wanna explain a little bit more about how these.

00:22:13.631 --> 00:22:17.001

rules might apply to subscription based programs so.

00:22:17.001 --> 00:22:20.251

you should recall that in programs that use of standard terms.

00:22:20.251 --> 00:22:23.301

and non standard terms that are substantially equal and have.

00:22:23.301 --> 00:22:26.541

at least nine weeks of instructional time and length the payment.

00:22:26.541 --> 00:22:29.931

period for purposes of all title IV programs is the term.

00:22:29.931 --> 00:22:32.971

So that's the simplest way to do it. That's the most straightforward.

00:22:32.971 --> 00:22:36.131

However, in programs using nonstandard terms.

00:22:36.131 --> 00:22:38.051

that are not substantially equal.

00:22:38.101 --> 00:22:41.301

There are actually two different definitions for payment periods based.

00:22:41.301 --> 00:22:44.361

which title IV program you're talking about for Title.

00:22:44.361 --> 00:22:47.571

four grant programs. The payment period is the term, but.

00:22:47.571 --> 00:22:50.761

for direct loans the payment period is the time that it takes a student.

00:22:50.761 --> 00:22:54.101

to complete half the hours and weeks in the academic year or program.

00:22:54.101 --> 00:22:57.171

whichever is shorter. And you might recognize that second.

00:22:57.171 --> 00:23:00.191

one because it looks more like the requirements for a non.

00:23:00.191 --> 00:23:01.191

term program.

00:23:02.081 --> 00:23:05.151

This separate treatment is extremely complicated even for.

00:23:05.151 --> 00:23:08.231

a traditional term based program, and it's going to be even more.

00:23:08.231 --> 00:23:11.581

complicated in a subscription based program, so technically.

00:23:11.581 --> 00:23:14.931

even though nothing prevents you from offering a subscription based program.

00:23:14.931 --> 00:23:18.471

that has non standard terms that are not substantially equal doing.

00:23:18.471 --> 00:23:21.731

some doing so would require that you have two separate.

00:23:21.731 --> 00:23:24.791

forms of monitoring your students progression. One form of.

00:23:24.791 --> 00:23:27.831

monitoring for your title for grant programs and one for your direct.

00:23:27.831 --> 00:23:31.071

loan disbursements. So we're not going to get into how that might work.

00:23:31.071 --> 00:23:35.071

in this presentation because it's going to. It would take more time than we have remaining today.

00:23:35.071 --> 00:23:35.071

00:23:35.131 --> 00:23:38.201

But it's just a caution if you're interested in offering a subscription based.

00:23:38.201 --> 00:23:41.781

program, you need to take this into account and think about how you're structuring.

00:23:41.781 --> 00:23:45.241

your subscription periods to make sure that they are structured in.

00:23:45.241 --> 00:23:48.711

standard terms or nonstandard terms that are substantially equal.

00:23:48.711 --> 00:23:52.081

Unless you want to have additional complication and how your dispersed.

00:23:52.081 --> 00:23:52.951

title for aid.

00:23:56.441 --> 00:23:59.551

So for the visual learners among you, we wanted to offer a visual.

00:23:59.551 --> 00:24:02.841

representation about how coursework can be structured in a subscription.

00:24:02.841 --> 00:24:05.851

based program and the flexibility that these programs can.

00:24:05.851 --> 00:24:08.881

offer students. So on this slide we have an example of.

00:24:08.881 --> 00:24:12.321

a student who is in the second year of four year subscription based program.

00:24:12.321 --> 00:24:12.321

00:24:13.231 --> 00:24:16.261

So you can see the blue rectangles on this slide those.

00:24:16.261 --> 00:24:19.321

are the subscription periods themselves, and those are the periods for.

00:24:19.321 --> 00:24:22.211

which the student calculates and disperses title IV aid.

00:24:22.771 --> 00:24:25.901

As we mentioned earlier, the subscription periods cannot overlap.

00:24:25.901 --> 00:24:29.421

and they generally have to follow the requirements for standard or non standard term.

00:24:29.421 --> 00:24:30.241

programs.

00:24:30.941 --> 00:24:34.171

Now below those blue rectangles you can see a whole array.

00:24:34.171 --> 00:24:37.321

or yellow rectangles, and those are the actual courses.

00:24:37.321 --> 00:24:40.651

that a particular student might be working on. Over these two subscription.

00:24:40.651 --> 00:24:43.671

periods. On some of them you can see a little arrow.

00:24:43.671 --> 00:24:46.781

so for English, 201 for example, it has an arrow pointing to the.

00:24:46.781 --> 00:24:49.911

left and that means the class actually started in a prior.

00:24:49.911 --> 00:24:54.031

subscription period. And has crossed into this first one similarly.

00:24:54.031 --> 00:24:57.231

economics 302, English 202, an psychology 206.

00:24:57.231 --> 00:25:00.321

extend from subscription period.

00:25:00.321 --> 00:25:02.761

4 into the following period.

00:25:02.951 --> 00:25:06.341

The classes overlap one another. They overlap subscription periods.

00:25:06.341 --> 00:25:09.351

and they can take place at almost anytime within whatever limits.

00:25:09.351 --> 00:25:11.201

that the school decides to set on them.

00:25:14.471 --> 00:25:17.491

So what are the real differences between traditional term based?

00:25:17.491 --> 00:25:20.971

programs and subscription based programs? Well, first.

00:25:20.971 --> 00:25:24.171

in a traditional term based program, students can enroll at different.

00:25:24.171 --> 00:25:27.571

levels. Every term. You could have a student who enrolls full time and fallen.

00:25:27.571 --> 00:25:30.681

halftime in spring, but if you're in a subscription based.

00:25:30.681 --> 00:25:33.961

program, you have to maintain a single enrollment status throughout.

00:25:33.961 --> 00:25:37.161

the program. Unless the student transfers no more often.

00:25:37.161 --> 00:25:40.271

than once per academic year to a version of the same program.

00:25:40.271 --> 00:25:42.881

with a different enrollment status, and we've already gone through that.

00:25:45.221 --> 00:25:48.891

And on this slide we have a second significant difference so.

00:25:48.891 --> 00:25:52.411

in a traditional term based program, there are no requirements for completion.

00:25:52.411 --> 00:25:55.581

of credits to receive title for Disbursements, except to the extent.

00:25:55.581 --> 00:25:58.811

that the student has to have an adequate pace of completion.

00:25:58.811 --> 00:26:01.121

for satisfactory academic progress purposes.

00:26:02.301 --> 00:26:05.571

But in this second bullet you can see a crucial difference in.

00:26:05.571 --> 00:26:08.581

subscription based program. Students have to meet certain course.

00:26:08.581 --> 00:26:11.591

completion requirements in order to receive subsequent disbursements.

00:26:11.591 --> 00:26:14.871

of title for aid. For every subscription period after the second period.

00:26:14.871 --> 00:26:18.011

of the student attends for the program. Now that's quite.

00:26:18.011 --> 00:26:21.141

different from your traditional term based program where students receive.

00:26:21.141 --> 00:26:24.431

aid each term based on their enrollment for that term.

00:26:24.431 --> 00:26:27.931

regardless of whether they complete coursework again, putting aside.

00:26:27.931 --> 00:26:31.311

satisfactory academic progress requirements, this is probably.

00:26:31.311 --> 00:26:34.321

the most important aspect of a subscription based program.

00:26:34.321 --> 00:26:34.321

00:26:34.371 --> 00:26:37.661

And Greg is going to spend quite a bit of time on this in the next few minutes.

00:26:37.661 --> 00:26:37.661

00:26:40.591 --> 00:26:43.921

So you might be thinking at this point that subscription based programs actually.

00:26:43.921 --> 00:26:47.501

might sound a little bit more like non term programs than you thought.

00:26:47.501 --> 00:26:50.961

But there are also some important differences between non term programs.

00:26:50.961 --> 00:26:54.321

and subscription based programs in a non term program.

00:26:54.321 --> 00:26:57.701

a student does not complete a payment period and begin the next period.

00:26:57.701 --> 00:27:00.721

until they've completed the hours and weeks in the prior period.

00:27:00.721 --> 00:27:00.721

00:27:01.631 --> 00:27:05.001

In a subscription based program, a student can complete a subscription.

00:27:05.001 --> 00:27:08.341

period and begin the next period. It's just that they can't.

00:27:08.341 --> 00:27:11.481

receive a disbursement for the subsequent subscription period.

00:27:11.481 --> 00:27:14.691

if they haven't met the course completion requirement, so.

00:27:14.691 --> 00:27:17.881

whereas in a non term program you haven't even begun the next payment.

00:27:17.881 --> 00:27:21.121

period until you've completed the course work in a subscription based.

00:27:21.121 --> 00:27:24.461

program, you may begin the next one, but you're just not going to get paid.

00:27:24.461 --> 00:27:27.551

title IV aid for it until you've completed the requisite number.

00:27:27.551 --> 00:27:28.291

of credits.

00:27:30.751 --> 00:27:34.001

Another difference is that in a non term program a student is always.

00:27:34.001 --> 00:27:37.061

considered full time and a payment period is the period of time.

00:27:37.061 --> 00:27:40.581

that it takes to complete half the week, half the hours and half the weeks in an.

00:27:40.581 --> 00:27:43.721

academic year or program, whichever is shorter but.

00:27:43.721 --> 00:27:47.341

in a subscription based program, the school has a lot more discretion.

00:27:47.341 --> 00:27:50.741

The programs can use enrollment statuses other than full time.

00:27:50.741 --> 00:27:53.931

for example 3/4 time or half time and the payment.

00:27:53.931 --> 00:27:57.061

period is generally the term. But note again.

00:27:57.061 --> 00:28:00.241

the asterisk. Here for programs that where subscription periods are.

00:28:00.241 --> 00:28:01.671

not substantially equal.

00:28:01.721 --> 00:28:04.721

As I mentioned before, those would be much more complicated.

00:28:06.881 --> 00:28:09.991

With that I will turn it over to Greg to walk us through.

00:28:09.991 --> 00:28:13.461

the course completion requirements of first subscription based programs.

00:28:13.461 --> 00:28:17.231

and a few other considerations that we want you to keep in mind, Greg.

00:28:17.231 --> 00:28:17.231

00:28:17.891 --> 00:28:18.701

Thanks Dave.

00:28:19.331 --> 00:28:22.541

And I want to welcome you all and.

00:28:22.541 --> 00:28:26.241

thank you for spending part of your day with us, OK?

00:28:26.241 --> 00:28:29.291

as Dave said, I'm going to get into a discussion of course completion.

00:28:29.291 --> 00:28:30.001

requirements.

00:28:31.371 --> 00:28:34.521

And this is sort of a review here, but students in a subscription based.

00:28:34.521 --> 00:28:37.711

program are paid in accordance with enrollment status that is.

00:28:37.711 --> 00:28:38.871

set for their program.

00:28:39.891 --> 00:28:43.061

And for the first two subscription periods that a student attends.

00:28:43.061 --> 00:28:46.121

there are no course completion required. There's no course completion.

00:28:46.121 --> 00:28:49.201

requirement, and we'll see how that might sound. A little bit odd to you, but as we.

00:28:49.201 --> 00:28:52.401

get into the examples, you see how that plays out in.

00:28:52.401 --> 00:28:55.961

order to receive a disbursement of title for aid that is associated.

00:28:55.961 --> 00:28:59.231

with that subsequent payment period, student has to have completed.

00:28:59.231 --> 00:29:02.401

the cumulative number of credit hours that are equal to the total number.

00:29:02.401 --> 00:29:05.431

of hours for which the student was enrolled in all the previously.

00:29:05.431 --> 00:29:08.441

attended terms. However, we exclude the number of.

00:29:08.441 --> 00:29:11.801

hours for which the student was enrolled in the most recently.

00:29:11.801 --> 00:29:14.851

attended term, and again, this might seem confusing now, but hopefully.

00:29:14.851 --> 00:29:14.851

00:29:15.081 --> 00:29:18.291

It will become a little more clear as we look at some examples.

00:29:18.291 --> 00:29:18.291

00:29:23.871 --> 00:29:27.051

E subscription period that the student attends is associated.

00:29:27.051 --> 00:29:30.351

with a number of credit hours based on the students enrollment status, remember?

00:29:30.351 --> 00:29:33.731

Dave talking about the fact that you established the enrollment.

00:29:33.731 --> 00:29:37.121

status for the student and that stays.

00:29:37.121 --> 00:29:40.411

with the student. So for example, if we have a program.

00:29:40.411 --> 00:29:43.681

that is a full time program so remembered a set of.

00:29:43.681 --> 00:29:46.821

the of the progress defined fully is entirely as full time.

00:29:46.821 --> 00:29:50.221

That's the only option then everybody in it is enrolled full time.

00:29:50.221 --> 00:29:53.781

So in this case the program is full time the institutions definition.

00:29:53.781 --> 00:29:55.311

of full time is 12.

00:29:55.361 --> 00:29:58.451

Hours each subscription period, then is necessarily.

00:29:58.451 --> 00:30:01.501

associated with 12 hours and that will be with the students.

00:30:01.501 --> 00:30:04.871

expected to have earned as the student progresses.

00:30:04.871 --> 00:30:08.031

through the program, the number of hours associated with each term.

00:30:08.031 --> 00:30:08.031

00:30:08.671 --> 00:30:12.161

are added to the cumulative total needed for the student to receive.

00:30:12.161 --> 00:30:15.291

any aid with to receive the next disbursement.

00:30:15.291 --> 00:30:16.831

when we come up with the next thing period.

00:30:20.851 --> 00:30:24.601

If the student has completed a sufficient number of hours, qualifies.

00:30:24.601 --> 00:30:28.281

him or her for the disbursement for subscription period, the.

00:30:28.281 --> 00:30:31.321

disbursement can be made up to 10 days prior to the beginning of that.

00:30:31.321 --> 00:30:34.541

period. Otherwise, the school must wait until.

00:30:34.541 --> 00:30:37.761

the student has completed the necessary credit hours so.

00:30:37.761 --> 00:30:41.181

let's think about that for a moment. You're all familiar, probably with the general.

00:30:41.181 --> 00:30:44.371

rules that we have or cash management role that we have for.

00:30:44.371 --> 00:30:47.911

term based programs where you can pay up to 10 days.

00:30:47.911 --> 00:30:51.001

paid the disbursement up to 10 days prior to the beginning of that.

00:30:51.001 --> 00:30:52.021

payment period.

00:30:52.061 --> 00:30:55.181

It's generally the case here. However, if the student does not.

00:30:55.181 --> 00:30:58.211

qualify for that payment at the beginning of the payment.

00:30:58.211 --> 00:31:01.611

period because he or she has not earned the requisite number of hours.

00:31:01.611 --> 00:31:05.411

then you have to wait until that number of hours has.

00:31:05.411 --> 00:31:06.181

occured.

00:31:07.531 --> 00:31:11.431

Now, once the number of credit hours required to receive a disbursement.

00:31:11.431 --> 00:31:14.441

for that subscription period is equal to or exceeds the.

00:31:14.441 --> 00:31:17.541

number of credit hours that we need, the student is.

00:31:17.541 --> 00:31:20.631

no longer eligible for title 4 aid in that program. So once.

00:31:20.631 --> 00:31:23.781

you've completed the number of hours in the program, then.

00:31:23.781 --> 00:31:27.271

or they are, I should say, rather, the number of credits required.

00:31:27.271 --> 00:31:30.491

to receive that disbursement exceeds the equals.

00:31:30.491 --> 00:31:33.921

or exceeds the number of credits required to complete the program. Students no longer.

00:31:33.921 --> 00:31:37.441

eligible, and we'll see how that plays out as well when we look at some of the examples.

00:31:37.441 --> 00:31:37.441

00:31:40.511 --> 00:31:43.941

Let's start with the course completion example. Here we have a standard term program.

00:31:43.941 --> 00:31:47.921

that uses semester hours, so pretty straightforward enrollment status.

00:31:47.921 --> 00:31:47.921

00:31:49.071 --> 00:31:52.301

Established for this program is full time and the schools.

00:31:52.301 --> 00:31:55.341

is going to define full time as 12 semester.

00:31:55.341 --> 00:31:58.811

hours. You can see here that we have three subscription.

00:31:58.811 --> 00:32:02.461

periods displayed. Subscription period one is the.

00:32:02.461 --> 00:32:05.821

is the fall and that's the first academic year fall.

00:32:05.821 --> 00:32:09.221

There are 12 hours associated with it. We have the second subscription period.

00:32:09.221 --> 00:32:12.271

which is spring still associated with our first academic year.

00:32:12.271 --> 00:32:15.361

We need 12 hours. 12 hours are associated with that as.

00:32:15.361 --> 00:32:18.661

well. And finally we have the third subscription period falling.

00:32:20.241 --> 00:32:23.071

And that's the fault in there are 12 hours associated with it.

00:32:27.681 --> 00:32:30.791

So as we said before, and this just shows a graphically in.

00:32:30.791 --> 00:32:34.111

the first subscription period, the student attends, there are no completion.

00:32:34.111 --> 00:32:37.131

requirements, and that's because this is the first. This is the first.

00:32:37.131 --> 00:32:40.431

period the students attending, so obviously nothing has to have been.

00:32:40.431 --> 00:32:43.831

completed prior to that, because this is our initial.

00:32:43.831 --> 00:32:46.971

This is our initial period enrollment student receives full.

00:32:46.971 --> 00:32:50.171

disbursements of Pell, Grant and direct loan for that period of time.

00:32:50.171 --> 00:32:53.271

and you can see here in green this is our subscription period. It is the.

00:32:53.271 --> 00:32:56.981

fall. It does correspond with the term as Dave said was necessary earlier.

00:32:56.981 --> 00:32:56.981

00:32:57.031 --> 00:33:00.701

We have 12 credit hours associated with this subscription.

00:33:00.701 --> 00:33:03.861

period and there is no completion requirement.

00:33:03.861 --> 00:33:03.861

00:33:04.841 --> 00:33:08.111

Student receives their full disbursements. The student completes six credit.

00:33:08.111 --> 00:33:11.211

hours during the first subscription period, and you can see here that.

00:33:11.211 --> 00:33:14.031

we have the two. The two others are displayed, not yet complete.

00:33:18.201 --> 00:33:21.271

Let's take a look at the second subscription period here. There is still.

00:33:21.271 --> 00:33:24.571

no completion requirement. Remember that the that.

00:33:24.571 --> 00:33:27.751

the we don't look at the subscription period directly.

00:33:27.751 --> 00:33:31.051

before the one we're talking about here, so we're allowed.

00:33:31.051 --> 00:33:34.231

to sort of we are allowed, not the count that one. So let's take a look.

00:33:34.231 --> 00:33:37.351

at the second subscription period. Here the student is going.

00:33:37.351 --> 00:33:40.401

to receive full disbursements of Pell Grants.

00:33:40.401 --> 00:33:41.611

and direct loans.

00:33:42.381 --> 00:33:46.011

credits completed at the beginning of the term are 6.

00:33:46.011 --> 00:33:49.031

, and even though there are only 6, because we're not going to count that one.

00:33:49.031 --> 00:33:52.321

the student can student can receive.

00:33:52.321 --> 00:33:55.371

a disbursement for that period of time. So note here that.

00:33:55.371 --> 00:33:58.491

we have credit hours associated with this term being 12 and.

00:33:58.491 --> 00:34:01.671

the completion requirement is still 0. Now we're going to move.

00:34:01.671 --> 00:34:04.231

into that third subscription period on the next slide.

00:34:07.581 --> 00:34:11.511

First, I should say we're going to talk about why there is no credit completion hour, no

00:34:11.511 --> 00:34:14.911

credit completion requirement for the second subscription period, which was spring.

00:34:14.911 --> 00:34:18.021

So remember that we said to go into exclude the credits that.

00:34:18.021 --> 00:34:21.231

are associated with the most recently attended term.

00:34:21.231 --> 00:34:24.251

when you are determining the number that are required to.

00:34:24.251 --> 00:34:25.421

receive a disbursement.

00:34:26.191 --> 00:34:28.791

So the most recently attended term was the fall.

00:34:30.581 --> 00:34:33.681

And so it's 12 credit hours are going to be excluded.

00:34:33.681 --> 00:34:36.971

Remember there was nothing in the beginning because that was the first subscription period.

00:34:36.971 --> 00:34:40.001

Now, where in the second subscription period, and.

00:34:40.001 --> 00:34:43.261

we don't have to count the preceding.

00:34:43.261 --> 00:34:44.311

subscription period.

00:34:45.851 --> 00:34:49.351

Now we can see here that we paid. We're going to go into the into the third.

00:34:49.351 --> 00:34:52.531

and the third subscription period. The student attends there.

00:34:52.531 --> 00:34:56.071

is a completion requirement to receive tile for disbursements, so.

00:34:56.071 --> 00:34:59.191

the student must complete the credits associated with all previous.

00:34:59.191 --> 00:35:02.531

terms except for the most recent, the student completed 4.

00:35:02.531 --> 00:35:05.741

hours in the second subscription period for a total of 10.

00:35:05.741 --> 00:35:05.741

00:35:06.721 --> 00:35:09.861

So now we don't. We can. We can eliminate that.

00:35:09.861 --> 00:35:12.921

previous one right? Because you don't look at the previous one, but.

00:35:12.921 --> 00:35:16.481

the student is now required to complete all of the credits.

00:35:16.481 --> 00:35:19.501

that are cumulative except for that preceding one so.

00:35:19.501 --> 00:35:22.781

with now we're forced to go back to the first one, and you can see that the credits.

00:35:22.781 --> 00:35:25.831

associated with that are 12. We now have a.

00:35:25.831 --> 00:35:28.951

credit completion requirement here of.

00:35:28.951 --> 00:35:31.621

12 credit hours for this third subscription period.

00:35:34.561 --> 00:35:38.031

Let's take a look at how this plays out. So to receive that disbursement.

00:35:38.031 --> 00:35:41.241

during the third subscription period the student must have completed.

00:35:41.241 --> 00:35:44.471

at least 12 hours. Remember, this might seem a little confusing.

00:35:44.471 --> 00:35:48.651

because they're thinking, well, we're we're xing out the preceding.

00:35:48.651 --> 00:35:51.791

subscription period, and we're not including it, and that's true or not.

00:35:51.791 --> 00:35:55.151

But now we have to go back to all of the cumulative hours before.

00:35:55.151 --> 00:35:58.451

that. And you see, we have 12. So we do have to look at that first.

00:35:58.451 --> 00:36:01.791

one our students only completed 10. So that's where we are now.

00:36:01.791 --> 00:36:03.671

The student completed six in the first.

00:36:04.041 --> 00:36:07.391

First subscription period student completed 4 now.

00:36:07.391 --> 00:36:10.401

we are still having 12 credit hours associated with.

00:36:10.401 --> 00:36:13.611

each term. The completion requirement is 12 because we have to go back.

00:36:13.611 --> 00:36:16.731

to the first subscription period there. But our students only.

00:36:16.731 --> 00:36:19.251

completed 10, so that's where we stand currently.

00:36:24.441 --> 00:36:27.641

Student cannot receive title for disbursements at the beginning.

00:36:27.641 --> 00:36:30.681

of a subscription period 3 but they can.

00:36:30.681 --> 00:36:34.221

still earn the credits that are necessary to receive the disbursement during the term.

00:36:34.221 --> 00:36:34.221

00:36:35.021 --> 00:36:38.291

So the student completes two more credits here by the.

00:36:38.291 --> 00:36:41.451

10th week of this term, and when the student has completed those.

00:36:41.451 --> 00:36:45.031

credits, we now have 12 cumulative credits and the institution.

00:36:45.031 --> 00:36:48.311

can make that disbursement. So let's look at the graphic again.

00:36:48.311 --> 00:36:51.391

Here we're looking at what we've already looked at. We see that.

00:36:51.391 --> 00:36:54.911

we had six hours completed in the first subscription.

00:36:54.911 --> 00:36:58.351

period. We didn't have any requirement for completion in the second subscription.

00:36:58.351 --> 00:37:00.551

period, and we have.

00:37:01.551 --> 00:37:02.461

At that point.

00:37:03.441 --> 00:37:05.091

4 additional hours completed.

00:37:05.911 --> 00:37:09.141

And now we're moving on to the third description.

00:37:09.141 --> 00:37:12.311

period here, and we see that we're in the fall, and.

00:37:12.311 --> 00:37:15.651

credits associate, or 12. The completion requirement is 12.

00:37:15.651 --> 00:37:18.691

We only have 10, so you can see here.

00:37:18.691 --> 00:37:21.771

as Dave pointed out earlier. This is showing that.

00:37:21.771 --> 00:37:25.231

concept that even though the student doesn't have those.

00:37:25.231 --> 00:37:28.301

all those hours and those hours were associated with the.

00:37:28.301 --> 00:37:31.731

previous term. Here, the student wants a student does complete.

00:37:31.731 --> 00:37:34.961

those additional 2 hours, and he's doing so in this third subscription.

00:37:34.961 --> 00:37:37.131

period that this person can be made.

00:37:37.311 --> 00:37:38.981

So we get to.

00:37:40.171 --> 00:37:43.321

We get into this subscription period, we get to the 10th week of.

00:37:43.321 --> 00:37:46.681

this subscription period. The student is now earned those additional 2 hours.

00:37:46.681 --> 00:37:49.961

he or she has the 12 hours and that this person may be made.

00:37:49.961 --> 00:37:49.961

00:37:56.141 --> 00:37:59.391

So far we've talked about the fact that the student comes in and.

00:37:59.391 --> 00:38:02.731

the students attending a given enrollment status such as.

00:38:02.731 --> 00:38:05.951

full time, and that's the way that you work subscription.

00:38:05.951 --> 00:38:09.051

based programs. Student agrees to a.

00:38:09.051 --> 00:38:12.451

enrollment status and that is enforced. However, we do have.

00:38:12.451 --> 00:38:15.581

some provisions for students changing enrollment status, the.

00:38:15.581 --> 00:38:18.731

nature of subscription based programs are such that.

00:38:18.731 --> 00:38:21.851

this isn't allowed all the time as it is with.

00:38:21.851 --> 00:38:21.851

00:38:22.551 --> 00:38:25.791

With the traditional program where the student might go in the fall for.

00:38:25.791 --> 00:38:28.901

halftime and then in the spring for full time and then.

00:38:28.901 --> 00:38:31.951

go back and forth, but we do we.

00:38:31.951 --> 00:38:35.201

don't. We're not exactly 100% rigid here. We do allow for some.

00:38:35.201 --> 00:38:38.281

changes, so the student is permitted to transfer to.

00:38:38.281 --> 00:38:41.381

a version of the same subscription program with.

00:38:41.381 --> 00:38:45.021

a different enrollment status, no more than once a year, so.

00:38:45.021 --> 00:38:48.321

this is an important concept. Remember the student here is.

00:38:48.321 --> 00:38:50.691

now considered to be.

00:38:51.571 --> 00:38:54.721

Transferred to a version of the same subscription based program.

00:38:54.721 --> 00:38:57.941

with a different enrollment status and this is only allowable.

00:38:57.941 --> 00:39:01.311

once per academic year at the beginning of the payment period.

00:39:01.311 --> 00:39:04.821

and when the student changes enrollment status. The cumulative credit.

00:39:04.821 --> 00:39:08.041

completion requirement continues to follow them. It continues.

00:39:08.041 --> 00:39:11.171

to increase with each new subscription period, but it's going to increase.

00:39:11.171 --> 00:39:14.321

at a different rate, and we're going to show how that works.

00:39:14.321 --> 00:39:16.921

on some with some examples that are upcoming here.

00:39:19.291 --> 00:39:22.801

So here we have an example of a change in enrollment status, the.

00:39:22.801 --> 00:39:25.961

same program is shown that we showed in the prior.

00:39:25.961 --> 00:39:28.981

example. Full time is 12 credit hours halftime.

00:39:28.981 --> 00:39:29.891

is 6 hours.

00:39:30.951 --> 00:39:34.261

After the fall subscription period, the student decides.

00:39:34.261 --> 00:39:37.311

that the full time program course load is too much.

00:39:37.311 --> 00:39:40.491

and now wants to switch to a halftime version of the program, so.

00:39:40.491 --> 00:39:43.851

here we can see that laid out for you this subscription.

00:39:43.851 --> 00:39:46.991

period for the first for the fall, or.

00:39:46.991 --> 00:39:50.001

subscription period one is shown there in blue.

00:39:50.001 --> 00:39:53.271

and the credits that credit hours associated with that. Because it's full time.

00:39:53.271 --> 00:39:56.311

are indicated at 12. Now the students going to switch to.

00:39:56.311 --> 00:39:59.391

halftime so we have subscription period 2.

00:40:01.631 --> 00:40:04.651

Shown, but now the credit hours associated are no longer.

00:40:04.651 --> 00:40:07.661

12. There six because the student has switched to.

00:40:07.661 --> 00:40:10.971

a halftime version of the program and he or she stays.

00:40:10.971 --> 00:40:14.041

in that version for the ensuing fall and we still have.

00:40:14.041 --> 00:40:16.611

six hours associated with that subscription period.

00:40:21.041 --> 00:40:24.421

Now we're going to assume that our student is progressing at the same rate.

00:40:24.421 --> 00:40:27.501

as a student. In our original example, only difference here.

00:40:27.501 --> 00:40:29.451

is that we have a different enrollment status.

00:40:30.081 --> 00:40:33.591

So the question we're asking is, will, the student qualify for disbursement.

00:40:33.591 --> 00:40:36.611

when the third subscription period begins? So let's take a.

00:40:36.611 --> 00:40:37.421

look at that.

00:40:38.811 --> 00:40:42.431

Going back to the fall here, we see this subscription period.

00:40:42.431 --> 00:40:42.431

00:40:44.391 --> 00:40:47.451

One with in the first academic year.

00:40:47.451 --> 00:40:50.541

so we're going to look at these three. These three subscription periods played.

00:40:50.541 --> 00:40:53.561

out, and we're going to find out here that you don't have to answer. The question is answered for.

00:40:53.561 --> 00:40:57.131

you and the question, and the answer is no, but we're going to describe why.

00:40:57.131 --> 00:41:00.241

so only the hours from the most recent period are.

00:41:00.241 --> 00:41:03.461

excluded from the number the student must complete to receive.

00:41:03.461 --> 00:41:06.681

a new disbursement. The rest is cumulative, so the hours.

00:41:06.681 --> 00:41:09.721

from spring are excluded, but the hours from fall are

00:41:09.721 --> 00:41:13.161

still included. So let's take a look at how that plays out. We see this subscription.

00:41:13.161 --> 00:41:14.041

period here.

00:41:14.081 --> 00:41:17.231

For fall there are 12 credit hours associated with that.

00:41:17.231 --> 00:41:20.751

We don't have to look at the.

00:41:20.751 --> 00:41:20.751

00:41:21.661 --> 00:41:24.771

Directly preceding subscription period, which in this case is.

00:41:24.771 --> 00:41:26.431

going to be the spring.

00:41:27.241 --> 00:41:30.521

And now we're in fall, so this subscription period 3 is.

00:41:30.521 --> 00:41:33.581

academic year 2 fall. There are only six hours.

00:41:33.581 --> 00:41:36.621

associated with it, but remember that.

00:41:36.621 --> 00:41:39.781

we still that the students cumulative progress.

00:41:39.781 --> 00:41:42.901

is still following us, right? Just because you switched to

00:41:42.901 --> 00:41:46.061

a program with a different enrollment status doesn't mean you can forget about those.

00:41:46.061 --> 00:41:49.201

cumulative requirements. And when the student was there in fall, that.

00:41:49.201 --> 00:41:52.331

was a full time requirement. We can't make that go away.

00:41:52.331 --> 00:41:55.401

So although we don't have to look back the spring, we do have to look.

00:41:55.401 --> 00:41:58.121

at the cumulative and that is going to be 12, so.

00:41:58.171 --> 00:42:01.481

You'll note here that although the credit hours associated.

00:42:01.481 --> 00:42:04.601

with this particular term, we arein that's subscription period 3.

00:42:04.601 --> 00:42:08.181

three or six, we still have the completion requirement of 12.

00:42:08.181 --> 00:42:11.031

and thus far, or student has only earned 10 hours.

00:42:15.161 --> 00:42:18.251

THe still needs to complete two more hours in.

00:42:18.251 --> 00:42:21.411

order to qualify for the next set of title for disbursement. So.

00:42:21.411 --> 00:42:24.591

as we saw in the previous example, once the student completes those.

00:42:24.591 --> 00:42:27.751

hours, the school can make the disbursements for that third.

00:42:27.751 --> 00:42:31.631

subscription period, and we see that displayed for you below.

00:42:31.631 --> 00:42:34.711

We still have the first years, the first subscription period, rather which.

00:42:34.711 --> 00:42:38.141

was based on full time, and we have 12 credit hours associated.

00:42:38.141 --> 00:42:41.431

with it. We note the student completed six hours, the 2nd.

00:42:41.431 --> 00:42:44.671

subscription period. Our student completed four. We're now in a third.

00:42:44.671 --> 00:42:45.811

and we're looking back.

00:42:45.871 --> 00:42:49.121

We don't have to include the credits for the previous.

00:42:49.121 --> 00:42:49.121

00:42:49.771 --> 00:42:53.341

Subscription period, but we are responsible for the cumulative.

00:42:53.341 --> 00:42:56.721

number of credits required and those are 12 so.

00:42:56.721 --> 00:42:59.781

you can see here in this third subscription period that.

00:42:59.781 --> 00:43:03.241

once our student completes the two hours he or, she is missing.

00:43:03.241 --> 00:43:04.531

The disbursement can be made.

00:43:09.031 --> 00:43:12.141

Now we're going to imagine the student continues in the program and look.

00:43:12.141 --> 00:43:15.201

at how does the change in the enrollment status affect.

00:43:15.201 --> 00:43:18.521

that student as we move forward so you can see here.

00:43:18.521 --> 00:43:21.561

what we already looked at, we had that first subscription period. The student.

00:43:21.561 --> 00:43:24.901

completing six hours. But there were 12 hours associated.

00:43:24.901 --> 00:43:27.981

with it, and the second subscription period. Now the student.

00:43:27.981 --> 00:43:31.441

has moved to a halftime version of the program only.

00:43:31.441 --> 00:43:34.751

six hours or associated with it. Or student completes 4.

00:43:34.751 --> 00:43:34.751

00:43:35.471 --> 00:43:37.041

And then you can see here.

00:43:38.761 --> 00:43:41.851

That in the next subscription period we.

00:43:41.851 --> 00:43:45.031

have credits associated with the with the with.

00:43:45.031 --> 00:43:48.221

this being 6 and, our student has also completed 4.

00:43:48.221 --> 00:43:48.221

00:43:53.551 --> 00:43:56.781

The credits associated with the most recent period are excluded.

00:43:56.781 --> 00:44:00.221

but for the hours from the first two payment periods.

00:44:00.221 --> 00:44:03.661

that would be for the academic year 1 fall.

00:44:03.661 --> 00:44:06.721

And academic year 1 spring. Those are 12 because remember.

00:44:06.721 --> 00:44:09.961

that the student was full time, so they credits.

00:44:09.961 --> 00:44:13.321

associated with that payment here, were 12 and then for spring.

00:44:13.321 --> 00:44:16.721

there were six there now added together for a total of.

00:44:16.721 --> 00:44:19.861

total of 18 hours and see how that works there.

00:44:19.861 --> 00:44:23.261

you have the fall in the spring you see the 12 associated and

00:44:23.261 --> 00:44:24.791

the six associated.

00:44:24.901 --> 00:44:28.651

So we need 18 our student still has only completed 6.

00:44:28.651 --> 00:44:31.711

in that fall and four in that spring we.

00:44:31.711 --> 00:44:35.031

don't have to look at that next.

00:44:35.031 --> 00:44:35.821

payment period.

00:44:36.611 --> 00:44:39.861

But subscription payment period for our subscription.

00:44:39.861 --> 00:44:42.881

period 3 and academic year two we have.

00:44:42.881 --> 00:44:45.931

six associated, but the completion requirement is.

00:44:45.931 --> 00:44:48.941

still 18 because we don't have to look at the last one, but we.

00:44:48.941 --> 00:44:50.961

do have to look at the.

00:44:51.151 --> 00:44:54.321

Cumulative right, so that is 18 and.

00:44:54.321 --> 00:44:57.501

as of this point the credits completed be at the beginning.

00:44:57.501 --> 00:45:00.251

of this term are only 14.

00:45:04.971 --> 00:45:08.151

So the student will not qualify for title 4.

00:45:08.151 --> 00:45:11.451

disbursements for academic Year 2 spring.

00:45:11.451 --> 00:45:13.361

until they complete four more hours.

00:45:13.941 --> 00:45:17.231

Now, this could this could happen even after that payment period.

00:45:17.231 --> 00:45:20.371

ends. So you see here let's go right back down to that last.

00:45:20.371 --> 00:45:23.511

subscription period subscription Period 3 award.

00:45:23.511 --> 00:45:26.951

year two in the spring. The credit hours associated are only 6.

00:45:26.951 --> 00:45:30.131

, but we still have that completion requirement of 18 that being.

00:45:30.131 --> 00:45:31.371

our cumulative number.

00:45:31.961 --> 00:45:35.211

The credits completed at the beginning of the term were 14.

00:45:35.211 --> 00:45:38.251

and we're asking, will the student complete the requisite?

00:45:38.251 --> 00:45:41.401

number of hours to get to 18? We hope so if.

00:45:41.401 --> 00:45:43.671

that happens, the student will be eligible for the disbursement.

00:45:48.211 --> 00:45:51.551

Now let's move to a discussion of satisfactory academic progress.

00:45:51.551 --> 00:45:53.581

R 2T4 and attendance.

00:45:57.351 --> 00:46:00.461

Satisfactory progress.

00:46:00.461 --> 00:46:03.661

There isn't a big difference here between subscription.

00:46:03.661 --> 00:46:07.091

based programs and other programs, but a lot of what we're.

00:46:07.091 --> 00:46:10.041

going to have to do with this AP remains the same.

00:46:11.301 --> 00:46:15.061

Ann is in line with what you do for other term based programs.

00:46:15.061 --> 00:46:18.181

for instance checking ASAP at the end of the term still.

00:46:18.181 --> 00:46:21.261

required. You can still have warning periods, but to have those you.

00:46:21.261 --> 00:46:24.321

must check at the end of each term do you can.

00:46:24.321 --> 00:46:27.781

also have probationary periods if there are appeal procedures.

00:46:27.781 --> 00:46:31.041

established with this program and you still need to have a policy.

00:46:31.041 --> 00:46:34.961

to account for repeats, withdrawals, incompletes and transfer credits.

00:46:34.961 --> 00:46:34.961

00:46:37.031 --> 00:46:40.121

An SAP for subscription based programs does.

00:46:40.121 --> 00:46:43.141

include all sap measurements, except you're not required to.

00:46:43.141 --> 00:46:46.611

have a quantitative pace measurement that's laid out.

00:46:46.611 --> 00:46:49.691

in the September 2nd, 2020 final.

00:46:49.691 --> 00:46:52.881

rule. And if you think about that, there being no requirement.

00:46:52.881 --> 00:46:56.071

for pace, it makes sense, because remember what?

00:46:56.071 --> 00:46:59.081

we're doing with these. With these programs, there are certain.

00:46:59.081 --> 00:47:02.161

amount of credits associated with the enrollment status.

00:47:02.161 --> 00:47:05.431

For each subscription period, and the student has to attain that number.

00:47:05.431 --> 00:47:07.651

of hours in order to be eligible.

00:47:07.751 --> 00:47:08.941

For the next disbursement.

00:47:09.491 --> 00:47:12.581

So because that's in place then a pace.

00:47:12.581 --> 00:47:13.871

requirement really is not.

00:47:14.991 --> 00:47:18.131

An issue the student simply cannot be paid until he or she gets.

00:47:18.131 --> 00:47:22.131

that requisite number of hours. So in that regard it's similar to what

00:47:22.131 --> 00:47:25.351

we have with a non term program. So because of this, you're not.

00:47:25.351 --> 00:47:28.391

required to have a past measurement, but all these other aspects of.

00:47:28.391 --> 00:47:31.541

SAP apply the courses begun in one term.

00:47:31.541 --> 00:47:34.801

and completed in a subsequent term will be factored into the next.

00:47:34.801 --> 00:47:37.851

SAP evaluation checkpoint that follows the.

00:47:37.851 --> 00:47:39.171

completion of that course.

00:47:46.291 --> 00:47:48.371

Now I will take a look at the return of title IV funds.

00:47:49.051 --> 00:47:50.061

And this is a.

00:47:50.661 --> 00:47:54.051

I think rather straightforward. You pretty much following the.

00:47:54.051 --> 00:47:57.401

guidelines for any term based program, so you kind of just going to forget here.

00:47:57.401 --> 00:48:00.571

that you're in a in a subscription based environment and follow.

00:48:00.571 --> 00:48:03.631

the R2T4 rules that attend to term based programs in.

00:48:03.631 --> 00:48:05.891

general, including the use of the payment period.

00:48:06.761 --> 00:48:09.931

When you have a standard term the term or the .

00:48:09.931 --> 00:48:13.491

payment period is always going to be the term for the R2T4 period.

00:48:13.491 --> 00:48:16.771

The denominator will include all days in the normal.

00:48:16.771 --> 00:48:20.131

term timeframe, excluding scheduled breaks of five consecutive.

00:48:20.131 --> 00:48:23.371

days or more, so you're already familiar with that rule term.

00:48:23.371 --> 00:48:26.611

length doesn't change if a student starts the course in one.

00:48:26.611 --> 00:48:30.131

term while, completing in another, so remember examples, that's possible.

00:48:30.131 --> 00:48:33.141

in a subscription based program, but.

00:48:33.141 --> 00:48:36.251

it doesn't change the stated length of the term, it's important.

00:48:36.251 --> 00:48:37.141

to remember that.

00:48:37.331 --> 00:48:41.251

When thinking about it in the context of R2T4 you.

00:48:41.251 --> 00:48:44.731

would use the full formal charges that are associated with each term.

00:48:44.731 --> 00:48:44.731

00:48:45.441 --> 00:48:48.781

Charges are not adjusted due to changes in enrollment status.

00:48:48.781 --> 00:48:48.781

00:48:50.711 --> 00:48:53.721

Programs can be required to take attendance or not required to take.

00:48:53.721 --> 00:48:56.871

attendance. So just as you may have a.

00:48:56.871 --> 00:49:00.001

traditional program measured in standard terms where.

00:49:00.001 --> 00:49:03.581

attendance taking is not required or it is required.

00:49:03.581 --> 00:49:06.621

that could that could also be the case here with subscription.

00:49:06.621 --> 00:49:09.781

based programs and you will be following the normal.

00:49:09.781 --> 00:49:13.191

criteria to determine aid dispersed or aid that could have been dispersed.

00:49:13.191 --> 00:49:16.341

and only aid it is intended for subscription period.

00:49:16.341 --> 00:49:19.451

will be included in an R2T4 calculation for that period.

00:49:19.451 --> 00:49:19.451

00:49:24.331 --> 00:49:25.901

Another important concept here that.

00:49:26.601 --> 00:49:29.751

Subscription based programs are not programs.

00:49:29.751 --> 00:49:31.641

that are considered to be offered in modules.

00:49:32.471 --> 00:49:36.031

So you don't have to worry about all of the module considerations.

00:49:36.031 --> 00:49:39.091

that you might have to in a more traditional environment where you.

00:49:39.091 --> 00:49:42.101

might have a an academic year comprised.

00:49:42.101 --> 00:49:45.511

of two semesters broken up into maybe a maybe.

00:49:45.511 --> 00:49:48.541

a 16 week semester with two eight week modules, you're not going to.

00:49:48.541 --> 00:49:51.631

have that in a subscription based period, so.

00:49:51.631 --> 00:49:54.831

you don't have to worry about those rules. You don't have to worry about the 49%.

00:49:54.831 --> 00:49:57.921

in the 1/2 time completion minimums all of.

00:49:57.921 --> 00:50:00.231

that is not germane to these types of programs.

00:50:01.481 --> 00:50:04.741

However, the exemption for completing all requirements for graduation.

00:50:04.741 --> 00:50:08.021

does apply to all programs and includes subscription based programs.

00:50:08.021 --> 00:50:08.021

00:50:14.001 --> 00:50:14.511

00:50:15.861 --> 00:50:19.181

Students in a subscription based program or considered withdrawn.

00:50:19.181 --> 00:50:22.381

if they're unable to resume attempt attendance within a payment period.

00:50:22.381 --> 00:50:25.541

or period of enrollment for more than 60 days after.

00:50:25.541 --> 00:50:28.511

they've ceased attendance, unless they're approved for an LOA.

00:50:29.981 --> 00:50:33.001

And another thing to remember here is that subscription based programs.

00:50:33.001 --> 00:50:36.271

do not have to permit a student to complete coursework.

00:50:36.271 --> 00:50:39.281

the student began prior to the leave of absence as.

00:50:39.281 --> 00:50:42.811

is the requirement for a standard term based program.

00:50:42.811 --> 00:50:42.811

00:50:52.471 --> 00:50:55.871

In many ways, subscription based programs are the same as other programs.

00:50:55.871 --> 00:50:59.131

For instance, you need to document at least one day of academic.

00:50:59.131 --> 00:51:02.591

attendance for student to qualify for title 4 aid during the period.

00:51:02.591 --> 00:51:05.611

If the student doesn't ever attend, just as it is with any other.

00:51:08.011 --> 00:51:11.401

Type of program is stood never established. Eligibility for that.

00:51:11.401 --> 00:51:14.411

payment period and it's the same for a subscription based program.

00:51:14.411 --> 00:51:14.411

00:51:16.071 --> 00:51:19.211

We talk about attendance for this purpose and for R2.

00:51:19.211 --> 00:51:22.641

T4 requirements, we maean participation in an academically.

00:51:22.641 --> 00:51:26.021

related event involving academic engagement and.

00:51:26.021 --> 00:51:29.531

we define that now in 34 CFR 600.2.

00:51:29.531 --> 00:51:29.531

00:51:30.681 --> 00:51:33.841

For Pell Grant you must be able to document that the student.

00:51:33.841 --> 00:51:36.891

attended sufficient courses or competencies to comprise.

00:51:36.891 --> 00:51:40.271

the students enrollment status. For example, 12 credit hours.

00:51:40.271 --> 00:51:40.271

00:51:40.911 --> 00:51:44.711

If the student attends less than the minimum number of courses or competencies.

00:51:44.711 --> 00:51:47.741

the Pell Grant might need to be reduced. So the rule.

00:51:47.741 --> 00:51:51.221

for Pell Grants actually statutory that student needs to have actually.

00:51:51.221 --> 00:51:54.651

begun all the credits for which the enrollment status is based.

00:51:54.651 --> 00:51:57.941

does apply here for subscription based period subscription.

00:51:57.941 --> 00:51:59.101

based programs as well.

00:52:04.851 --> 00:52:07.961

Each course in a subscription based program can only be counted.

00:52:07.961 --> 00:52:10.981

once for the purpose of establishing attendance for Pell Grant.

00:52:10.981 --> 00:52:12.471

Another title 4 eligibility.

00:52:13.131 --> 00:52:16.151

However, a course can be counted as attended, even if.

00:52:16.151 --> 00:52:19.331

it does not begin during the payment period in which it is counted.

00:52:19.331 --> 00:52:22.371

it's kind of different concept here with subscription.

00:52:22.371 --> 00:52:25.431

based programs. Here we haven't laid out graphically for you and.

00:52:25.431 --> 00:52:28.861

you can see in the blue we have those.

00:52:28.861 --> 00:52:32.171

hours that are associated with the subscription.

00:52:32.171 --> 00:52:35.431

period. 3 This is the second academic year for the fall.

00:52:35.431 --> 00:52:37.361

12 credits being associated with it.

00:52:38.321 --> 00:52:41.341

And we can see that in the case of English, that.

00:52:41.341 --> 00:52:41.341

00:52:42.171 --> 00:52:45.441

That course may well have begun prior to this subscription period.

00:52:45.441 --> 00:52:49.061

however could still be counted in this subscription period calculus.

00:52:49.061 --> 00:52:51.331

occurs all within the subscription period.

00:52:51.951 --> 00:52:56.181

You can see the chemistry here does begin in this fall.

00:52:56.181 --> 00:52:59.261

subscription period, but the student is carrying over into the spring and.

00:52:59.261 --> 00:53:02.601

that's not a problem with a subscription based program.

00:53:02.601 --> 00:53:05.641

Economics is the same, so you can see here that we do our12.

00:53:05.641 --> 00:53:08.751

associated with the fall in. The important thing here is that.

00:53:08.751 --> 00:53:11.921

we can only ever pay for those credits.

00:53:11.921 --> 00:53:15.621

one time. Now you can also see the credits associated.

00:53:15.621 --> 00:53:19.141

with the spring for academic year 2.

00:53:19.141 --> 00:53:22.231

12 credits are associated with it as well. You can see for instance that art.

00:53:22.231 --> 00:53:22.231

00:53:22.281 --> 00:53:25.291

That art does begin in the previous period, but that's not a problem we.

00:53:25.291 --> 00:53:28.451

can count it in the spring, however, we just can't.

00:53:28.451 --> 00:53:31.591

count it twice. What Wouldn't be appropriate would be to count that as part.

00:53:31.591 --> 00:53:34.811

of the enrollment status necessary for 12.

00:53:34.811 --> 00:53:37.911

credit hours in the fall, and then counted again for spring. That would not be.

00:53:37.911 --> 00:53:40.971

allowed, but here we're only going to count it for spring, so we have.

00:53:40.971 --> 00:53:43.991

art, economics, English, and psychology for a total of 12.

00:53:43.991 --> 00:53:45.221

credits in the spring.

00:53:49.641 --> 00:53:52.181

Now let's take a look at some examples. Insert, put all this together.

00:53:55.781 --> 00:53:57.971

Our first example. We were four year.

00:53:58.911 --> 00:54:00.271

Semester based program.

00:54:01.011 --> 00:54:02.301

And the total is.

00:54:03.241 --> 00:54:06.431

96 hours and we have.

00:54:06.431 --> 00:54:09.761

our academic year of 24 hours and 30 weeks some instructions.

00:54:09.761 --> 00:54:12.931

so pretty straightforward there for direct loans. The schools using a scheduled.

00:54:12.931 --> 00:54:16.551

academic year or SAY but somewhere as a trailer again, a fairly.

00:54:16.551 --> 00:54:20.451

common common academic year set up full time is.

00:54:20.451 --> 00:54:24.011

defined as 12 semester hours the summer subscription.

00:54:24.011 --> 00:54:27.311

is optional and Pell grants are calculated using.

00:54:27.311 --> 00:54:30.331

Formula One, and I think that's good we've shown.

00:54:30.331 --> 00:54:33.531

that here that you can apply Pell Grant Formula One.

00:54:33.531 --> 00:54:34.771

to subscription based.

00:54:34.821 --> 00:54:38.301

Programs, if they are standard term so.

00:54:38.301 --> 00:54:38.301

00:54:38.941 --> 00:54:42.101

Here we're going to see it all. This play itself out we've.

00:54:42.101 --> 00:54:45.111

got first first year SAY

00:54:45.111 --> 00:54:48.711

and Summer is a trailer you can see here that the number of hours required.

00:54:48.711 --> 00:54:51.831

a number of hours enrolled rather are 12 required.

00:54:51.831 --> 00:54:54.971

for disbursement are zero. Because this is our first payment period.

00:54:54.971 --> 00:54:58.261

and the hours earned for the fall.

00:54:58.261 --> 00:55:01.501

are nine. And because this is our first payment period or.

00:55:01.501 --> 00:55:04.951

subscription period, I should say the cumulative.

00:55:04.951 --> 00:55:07.971

hours are also nine and you can look at these disbursements.

00:55:07.971 --> 00:55:08.961

you should like.

00:55:09.651 --> 00:55:12.901

Sense because we have a sub there and unsub and.

00:55:12.901 --> 00:55:16.151

we've got half of a Pell Grant payment for.

00:55:16.151 --> 00:55:19.541

payment for the payment period being 1/2 the Pellunder.

00:55:19.541 --> 00:55:19.541

00:55:20.531 --> 00:55:22.401

Formula One.

00:55:24.161 --> 00:55:27.601

And now we're going to move to the to.

00:55:27.601 --> 00:55:30.781

the subscription period #2, which is the spring, and we still have.

00:55:30.781 --> 00:55:34.161

hours and roll here, 12 required for disbursement.

00:55:34.161 --> 00:55:37.561

We don't have any required for this person, because remember, we're looking to.

00:55:37.561 --> 00:55:40.761

cumulative, but we're excluding the previous.

00:55:40.761 --> 00:55:43.891

period. So because of that we have zero and the number.

00:55:43.891 --> 00:55:44.811

of hours earned.

00:55:45.371 --> 00:55:48.201

Cumulative hours earned at this point or 21.

00:55:52.211 --> 00:55:55.351

And we are now looking at the second disbursement, same.

00:55:55.351 --> 00:55:58.471

as the first disbursement, else $1.00 less because of the way.

00:55:58.471 --> 00:56:01.531

Pell Grant works out, the students not enrolled for summer.

00:56:01.531 --> 00:56:04.651

We're now looking to these second schedule academic year.

00:56:04.651 --> 00:56:07.661

with summer as a trailer. And here we have.

00:56:07.661 --> 00:56:10.591

fall, and this is.

00:56:11.591 --> 00:56:15.341

Subscription period #3 the hours enrolled or 12.

00:56:15.341 --> 00:56:18.521

and required for disbursements are going to be.

00:56:18.521 --> 00:56:21.561

12 and why is that? Because remember, we're looking back.

00:56:21.561 --> 00:56:24.581

to the previous term. And for subscription period we get.

00:56:24.581 --> 00:56:27.791

to exclude that. Doesn't that doesn't count, but we are.

00:56:27.791 --> 00:56:31.451

required to look at what is cumulative cumulatively.

00:56:31.451 --> 00:56:31.451

00:56:32.581 --> 00:56:34.631

Necessary at this point, and because.

00:56:35.191 --> 00:56:38.281

Remember that there were twelve in the first in the.

00:56:38.281 --> 00:56:41.661

first payment period. We have to look at that. We can exclude the second one.

00:56:41.661 --> 00:56:44.151

so we now have 12.

00:56:44.861 --> 00:56:46.771

Hours required for disbursement.

00:56:48.851 --> 00:56:52.061

Hours that are hours earned.

00:56:52.061 --> 00:56:55.561

and cumulative hours earned. So the hours around for this.

00:56:55.561 --> 00:56:58.801

For this in this payment period are nine and cumulatively.

00:56:58.801 --> 00:57:02.081

they're 30, so we're dispersing again are.

00:57:02.081 --> 00:57:05.211

you can see our sub and unsub and our Pell disbursement

00:57:05.211 --> 00:57:08.281

for the payment period or three. 3173 same.

00:57:08.281 --> 00:57:11.501

thing happens here. In spring we went.

00:57:11.501 --> 00:57:14.761

down again. We see the hours enrolled being 12 required for disbursement.

00:57:14.761 --> 00:57:17.361

are now 24. We can exclude.

00:57:18.821 --> 00:57:21.871

Exclude the previous payment period, but not the ones before.

00:57:21.871 --> 00:57:25.411

that. So cumulatively we have 24 necessary here hours.

00:57:25.411 --> 00:57:28.531

earned in this payment period or subscription period, are 12 and.

00:57:28.531 --> 00:57:31.751

cumulative cumulative hours are now 42 we.

00:57:31.751 --> 00:57:32.831

get our disbursement.

00:57:33.821 --> 00:57:37.121

And then we move to the summer.

00:57:37.121 --> 00:57:40.331

In this case, the student does go in summer and you can see here.

00:57:40.331 --> 00:57:43.431

that if you look at these disbursements, we've done.

00:57:43.431 --> 00:57:46.591

the loan over 3 payment.

00:57:46.591 --> 00:57:49.821

periods. That's not a problem. Students also getting a pellfor summer.

00:57:49.821 --> 00:57:52.411

Also pretty straightforward.

00:57:53.291 --> 00:57:56.501

And we've got 12 hours enrolled.

00:57:56.501 --> 00:57:59.571

36 required for disbursement, and the student does.

00:57:59.571 --> 00:58:02.781

earn 6 in this payment period for a cumulative.

00:58:02.781 --> 00:58:03.941

number of 48.

00:58:09.441 --> 00:58:12.551

Now we're going to carry example one forward.

00:58:12.551 --> 00:58:15.691

We still have that we still have that same.

00:58:15.691 --> 00:58:18.851

program set up and.

00:58:18.851 --> 00:58:21.871

let's take a look at what we're doing here. Now we're moving into.

00:58:21.871 --> 00:58:22.581

the third.

00:58:23.891 --> 00:58:27.021

The third SAY summer summer

00:58:27.021 --> 00:58:30.481

is still a trailer, so we're now in our.

00:58:30.481 --> 00:58:30.481

00:58:31.801 --> 00:58:34.951

Subscription period #6 and we can see things.

00:58:34.951 --> 00:58:38.291

moving forward here. We have total hours enrolled 12 required for.

00:58:41.491 --> 00:58:44.601

Disbursement are now 48 And the hours earned in this period will be 9.

00:58:44.601 --> 00:58:48.041

an for a cumulative cumulative total of 57.

00:58:48.041 --> 00:58:51.191

So our disbursements are made. We have no problem thus far we have.

00:58:51.191 --> 00:58:54.421

the requisite number of hours we need to make disbursements now.

00:58:54.421 --> 00:58:56.661

let's move into the spring if that same.

00:58:57.871 --> 00:59:01.011

About same SAY Why so? Now we're in subscription.

00:59:01.011 --> 00:59:04.311

period #7 with the spring we have again.

00:59:04.311 --> 00:59:05.171

12 hours.

00:59:06.471 --> 00:59:07.631

That are.

00:59:08.971 --> 00:59:12.241

The students enrolled in rather we now have required for disbursement.

00:59:12.241 --> 00:59:13.691

60 hours, right?

00:59:14.261 --> 00:59:18.081

And the hours earned in this in this.

00:59:18.081 --> 00:59:18.081

00:59:19.761 --> 00:59:22.881

Subscription period will be 12 for total of 69, but let's.

00:59:22.881 --> 00:59:25.311

look down to disbursement disbursement #7.

00:59:26.301 --> 00:59:29.371

We needed 60 hours.

00:59:29.371 --> 00:59:32.481

At this point. You'll note in subscription period 7 in order to.

00:59:32.481 --> 00:59:35.791

make our disbursement if you look back at the cumulative number of hours.

00:59:35.791 --> 00:59:39.511

earned previously, you've only got 57 so.

00:59:40.091 --> 00:59:43.241

We cannot make the disbursement for the spring until the student.

00:59:43.241 --> 00:59:46.291

has completed an additional 3 hours. So at the point of.

00:59:46.291 --> 00:59:49.351

which the student does complete those additional 3 hours and remember this.

00:59:49.351 --> 00:59:52.501

subscription based environment, they can still be working on.

00:59:52.501 --> 00:59:55.541

those hours from the previous subscription period into.

00:59:55.541 --> 00:59:58.581

the next subscription period. That's what's happening here as soon as.

00:59:58.581 --> 01:00:02.111

the student gets those hours, we can go ahead with disbursement #7

01:00:02.111 --> 01:00:05.531

there's no enrollment for summer, so we're not looking at that now.

01:00:05.531 --> 01:00:08.861

we're coming up to subscription period 8.

01:00:08.861 --> 01:00:11.321

and you'll note that the.

01:00:11.591 --> 01:00:14.721

Total number of hours that have been earned cumulatively are 69.

01:00:14.721 --> 01:00:17.801

However, we need 72 and

01:00:17.801 --> 01:00:20.941

Disbursement 8cannot take place until after that student has completed an.

01:00:20.941 --> 01:00:24.241

additional 3 hours and once that has a occurred we.

01:00:24.241 --> 01:00:27.441

can make that disbursement for what

01:00:27.441 --> 01:00:30.461

is the what's going to be the fall of the fourth SAY?

01:00:30.461 --> 01:00:32.991

Why now we move into the spring?

01:00:33.571 --> 01:00:37.261

And the we see the students taking 12 hours.

01:00:37.261 --> 01:00:40.421

required for disbursement at this point are 84.

01:00:40.421 --> 01:00:43.621

But you'll note the student does have 84 at the beginning of that term.

01:00:43.621 --> 01:00:46.691

We can go ahead and make the disbursement. You see those disbursements.

01:00:46.691 --> 01:00:48.861

made at this point, the program is completed.

01:00:53.931 --> 01:00:57.311

Now another example, we have a two year semester based program.

01:00:57.311 --> 01:00:57.311

01:00:58.731 --> 01:01:02.121

Of 48 hours and we have an academic.

01:01:02.121 --> 01:01:05.381

year of 24 semester hours with 30 weeks of instruction so.

01:01:05.381 --> 01:01:08.441

a fairly straightforward academic year. And this.

01:01:08.441 --> 01:01:11.741

time for direct loans. The school is going to use borrower based academic.

01:01:11.741 --> 01:01:15.311

Year two will be the AY two since they don't have an SAY

01:01:15.311 --> 01:01:15.311

01:01:16.431 --> 01:01:19.761

The school does not meet the cohort default.

01:01:19.761 --> 01:01:23.221

rate exemption exemption for a single disbursement, so that means.

01:01:23.221 --> 01:01:26.531

if they're doing it in a dispersing a term only, or just disbursing everything.

01:01:26.531 --> 01:01:30.091

within a term, then they're going to have to break that up into two separate.

01:01:30.091 --> 01:01:33.641

disbursements, because they don't meet the cohort

01:01:33.641 --> 01:01:34.531

default rate.

01:01:35.281 --> 01:01:38.761

Cut off for making a disbursement as a single disbursement.

01:01:38.761 --> 01:01:41.791

full time is still defined as 12 credit hours.

01:01:41.791 --> 01:01:44.581

In this case, summer subscription periods are required.

01:01:45.471 --> 01:01:47.131

That's at the discretion of the school.

01:01:47.911 --> 01:01:50.741

Pell grants are still going to be calculated using Formula One.

01:01:51.301 --> 01:01:54.611

And in the final period, we're going to have the student enrolled half time.

01:01:54.611 --> 01:01:57.841

and being reported to NSLDS as enrolled half time.

01:01:57.841 --> 01:02:00.941

so we can work our way through this program. Here, let's start with.

01:02:00.941 --> 01:02:04.251

the first BBAY and we are in spring.

01:02:04.251 --> 01:02:08.121

with that BBAY student starting in the spring, 12 hours.

01:02:08.121 --> 01:02:08.121

01:02:09.021 --> 01:02:09.831

Are enrolled.

01:02:11.151 --> 01:02:14.201

The students enrolled for 12 hours or other required for disbursement this.

01:02:14.201 --> 01:02:16.441

0 because this is the first.

01:02:17.411 --> 01:02:20.481

Period, the students enrolled in the first description period, so there is no.

01:02:20.481 --> 01:02:24.051

requirement the number of hours student earns at this point are 9.

01:02:24.051 --> 01:02:27.341

and nine are cumulative, because again, we're in our first.

01:02:27.341 --> 01:02:31.171

first subscription period. You can see the disbursements there very.

01:02:31.171 --> 01:02:34.741

straightforward. Not going to go into each of those, but you can see they have been made.

01:02:34.741 --> 01:02:37.841

Let's now move to summer again. The student enrolled for 12.

01:02:37.841 --> 01:02:38.611

credit hours.

01:02:39.611 --> 01:02:42.831

And we see zero required for disbursement. And why is that again?

01:02:42.831 --> 01:02:46.741

we can look back to the previous or the preceding.

01:02:46.741 --> 01:02:50.551

subscription period, and we're not required to count those hours so.

01:02:50.551 --> 01:02:50.551

01:02:51.121 --> 01:02:54.191

The second subscription period here the required amount.

01:02:54.191 --> 01:02:55.971

for disbursement is still 0.

01:02:58.021 --> 01:03:01.361

This student in this case earns 9 hours in the summer.

01:03:01.361 --> 01:03:04.421

just as he earned 9 hours in the previous spring.

01:03:04.421 --> 01:03:07.521

But now we have a cumulative 18 hours earned.

01:03:07.521 --> 01:03:09.601

disbursements have been made.

01:03:10.251 --> 01:03:13.451

Let's move to the second BBAY.

01:03:13.451 --> 01:03:16.581

which is starting in the fall and again we have 12.

01:03:16.581 --> 01:03:19.621

hours there. Student is enrolled in and at this.

01:03:19.621 --> 01:03:23.071

time for the first time. Now we have some hours required for disbursement.

01:03:23.071 --> 01:03:26.641

And why is that? Because while we can skip the previous.

01:03:26.641 --> 01:03:26.641

01:03:27.291 --> 01:03:30.411

Subscription period or not, and we're sort of not include that.

01:03:30.411 --> 01:03:33.721

one. We are now responsible for the cumulative.

01:03:33.721 --> 01:03:36.771

number of hours, and so we have to look back to the 12 that were.

01:03:36.771 --> 01:03:39.931

required for the first. We skip a second, so 12 plus zero is.

01:03:39.931 --> 01:03:43.071

12 so 12 are required for disbursement.

01:03:43.071 --> 01:03:43.901

at this point.

01:03:44.891 --> 01:03:49.401

The student earns 12 during this payment period for a cumulative of 30.

01:03:49.401 --> 01:03:49.401

01:03:50.391 --> 01:03:54.081

And you can see the disbursements made. Now let's move on to the spring.

01:03:54.081 --> 01:03:57.281

We have enrollment again in 12 hours.

01:03:57.281 --> 01:04:00.541

and this time required for disbursement or 24 hours.

01:04:00.541 --> 01:04:03.971

because we're looking at the cumulative number of hours.

01:04:03.971 --> 01:04:07.701

that are necessary without.

01:04:07.701 --> 01:04:10.881

looking at the previous subscription period. So we can forget.

01:04:10.881 --> 01:04:14.291

about that previous one, which is the fall there. But the.

01:04:14.291 --> 01:04:17.521

two prior to that are 12 and 12. So we have 24.

01:04:19.671 --> 01:04:22.051

And the hours earned here.

01:04:23.511 --> 01:04:27.021

Are going to be 12 hours for a cumulative cumulative.

01:04:27.021 --> 01:04:30.151

number of hours of 42, meaning that after.

01:04:30.151 --> 01:04:33.381

this point we have six hours remaining in the program. So after.

01:04:33.381 --> 01:04:36.621

that spring has elapsed, we only.

01:04:36.621 --> 01:04:39.661

have 6 hours remaining. You can see the disbursements have been made.

01:04:39.661 --> 01:04:42.721

so now let's go onto that third BBAY.

01:04:42.721 --> 01:04:44.981

and we're now going to be in summer.

01:04:46.361 --> 01:04:49.401

So the hours enrolled here because we still have.

01:04:49.401 --> 01:04:52.751

a full time program or 12 other students only taking 6 credits.

01:04:52.751 --> 01:04:56.371

because that's all we have remaining student can't take anymore credits.

01:04:56.371 --> 01:04:59.571

than we have remaining at the end of this third BBAY.

01:04:59.571 --> 01:05:02.631

the student will have completed 6 credits.

01:05:02.631 --> 01:05:06.221

for a total of 48, and the program has now been completed.

01:05:06.221 --> 01:05:06.221

01:05:06.981 --> 01:05:10.431

Let's look down at the disbursements.

01:05:10.431 --> 01:05:13.571

here. Note that we do have a. We are going.

01:05:13.571 --> 01:05:14.901

to have a prorated.

01:05:16.551 --> 01:05:19.781

Direct loan because we now have a final period of enrollment less than.

01:05:19.781 --> 01:05:23.621

academic year in length. That's what's being reflected there in those disbursements.

01:05:23.621 --> 01:05:26.661

and will note that we are looking at.

01:05:26.661 --> 01:05:29.901

summer only summer, but there were two disbursements right because?

01:05:29.901 --> 01:05:34.221

this school doesn't has not met the threshold.

01:05:34.221 --> 01:05:37.391

for the rather for the CDR exemption, so we're going.

01:05:37.391 --> 01:05:38.961

to make those two disbursements.

01:05:39.551 --> 01:05:42.941

For loans and you can see that reflected their note the.

01:05:42.941 --> 01:05:45.941

Pell is a halftime Pell, only making one disbursement for that.

01:05:52.051 --> 01:05:54.371

Finally, we're going to take a look at the third example.

01:05:55.211 --> 01:05:58.361

Here we have a two year semester based program 48.

01:05:58.361 --> 01:06:01.521

hours in this program we have an academic year of 24.

01:06:01.521 --> 01:06:04.861

semester hours and 30 weeks instruction and the school is.

01:06:04.861 --> 01:06:07.991

using borrower based academic year, 2 full time.

01:06:07.991 --> 01:06:11.291

is again defined as 12 hours this summer subscription period.

01:06:11.291 --> 01:06:14.831

is required and we're using Pell Grant Formula One.

01:06:14.831 --> 01:06:14.831

01:06:15.781 --> 01:06:17.571

So let's look at how this program.

01:06:20.301 --> 01:06:23.641

Progress is given. What are students doing? We have the student.

01:06:23.641 --> 01:06:26.751

enrolled for 12 hours.

01:06:26.751 --> 01:06:30.111

in the spring student starting in the spring. That's our.

01:06:30.111 --> 01:06:33.191

subscription period. Number one and our first borrower based.

01:06:33.191 --> 01:06:36.371

academic year. At this point, nothing is required for.

01:06:36.371 --> 01:06:39.331

disbursement because we're just beginning the program.

01:06:40.091 --> 01:06:41.431

At the end of this.

01:06:42.061 --> 01:06:45.161

Payment period or subscription period, the student will have earned 6.

01:06:45.161 --> 01:06:46.871

hours and.

01:06:47.631 --> 01:06:51.081

The cumulative the cumulative number of hours rather have six as well.

01:06:51.631 --> 01:06:54.741

Now we look at the disbursements you can see here pretty.

01:06:54.741 --> 01:06:58.041

straightforward. The student received 1750 in sub.

01:06:58.041 --> 01:07:01.341

thousand, in unsub and at $3173.

01:07:01.341 --> 01:07:04.621

Pell disbursement. Now we're going to move on to.

01:07:04.621 --> 01:07:08.011

the summer, which is the next subscription period.

01:07:08.011 --> 01:07:11.281

in our first borrower based academic year again the students.

01:07:11.281 --> 01:07:14.381

is enrolled for 12 hours. We have none.

01:07:14.381 --> 01:07:17.661

required for disbursement. And why is that? Because remember.

01:07:17.661 --> 01:07:20.741

that you have to look at the cumulative number of hours, but.

01:07:20.741 --> 01:07:22.491

you exclude the preceding.

01:07:22.541 --> 01:07:25.611

Subscription period, so we go back and we exclude the.

01:07:25.611 --> 01:07:28.671

12 for the preceding subscription period. So we still.

01:07:28.671 --> 01:07:31.781

have no hours required for disbursement.

01:07:31.781 --> 01:07:34.991

at the end of this summer subscription period.

01:07:34.991 --> 01:07:38.091

the student earned had earned 9 hours.

01:07:38.091 --> 01:07:41.151

for a total of 15 cumulative hours.

01:07:41.151 --> 01:07:44.651

were counting the nine in the summer, plus the six in the spring.

01:07:44.651 --> 01:07:48.011

and the students completed 15 again. You can see the disbursements.

01:07:48.011 --> 01:07:51.211

below. Now we're going to move into the second borrower based.

01:07:51.211 --> 01:07:52.031

academic year.

01:07:53.491 --> 01:07:54.491

We're in the fall.

01:07:55.361 --> 01:07:57.291

Our students enrolled for 12 hours.

01:07:58.581 --> 01:08:02.291

At this point, 12 hours are required for disbursement.

01:08:02.291 --> 01:08:06.021

And why is that? Well, we can look back and say.

01:08:06.021 --> 01:08:06.961

know the students.

01:08:07.731 --> 01:08:10.741

Student must have the cumulative number.

01:08:10.741 --> 01:08:13.961

of hours less the hours from the previous.

01:08:13.961 --> 01:08:17.041

or the preceding subscription period so.

01:08:17.041 --> 01:08:20.141

we can. We can not include those 12 for.

01:08:20.141 --> 01:08:23.221

the summer, but we are required to look at the cumulative.

01:08:23.221 --> 01:08:26.451

number, which makes this go back to spring and count that 12.

01:08:26.451 --> 01:08:29.821

so you can see here then that require for disbursement are 12.

01:08:29.821 --> 01:08:33.221

hours and we look at the end of this term and.

01:08:33.221 --> 01:08:36.581

see that the student earned six hours.

01:08:36.581 --> 01:08:36.581

01:08:37.151 --> 01:08:40.501

And now has a cumulative 21 hours those disbursements.

01:08:40.501 --> 01:08:44.331

were made because at the beginning the student was had cumulatively.

01:08:44.331 --> 01:08:47.491

Earned 15 hours, so he was eligible for that disbursement and.

01:08:47.491 --> 01:08:50.761

he received that disbursement and at the end of that fall we now have 21.

01:08:50.761 --> 01:08:52.071

hours cumulative.

01:08:52.711 --> 01:08:55.881

Since the student earned an additional 6 now, let's move.

01:08:55.881 --> 01:08:56.811

to the.

01:08:57.671 --> 01:09:00.781

To the spring we're still in the second borrower based academic year were in.

01:09:00.781 --> 01:09:02.431

subscription period #4

01:09:03.131 --> 01:09:06.471

Student is again enrolled for 12 hours. This is a full time program.

01:09:06.471 --> 01:09:06.471

01:09:07.311 --> 01:09:10.611

Required for disbursement at this point are 24 hours.

01:09:10.611 --> 01:09:10.611

01:09:11.301 --> 01:09:14.431

Remember the rule. We can go back and exclude the.

01:09:14.431 --> 01:09:17.451

preceding subscription period, which is 12 hours so.

01:09:17.451 --> 01:09:20.191

take that out. But the previous two we are.

01:09:21.101 --> 01:09:24.141

Responsible for it and that would be 12 and 12 so.

01:09:24.141 --> 01:09:27.401

we need 12 for the for spring of the 1st.

01:09:27.401 --> 01:09:30.681

t BBAY and 12 for summer. So we now have 24.

01:09:30.681 --> 01:09:34.751

necessary for disbursement.

01:09:34.751 --> 01:09:37.841

and you'll note here that at the end of the fall this student only had.

01:09:37.841 --> 01:09:38.571

21.

01:09:39.331 --> 01:09:41.291

So now we're moving into.

01:09:42.771 --> 01:09:45.891

We're seeing at the end of this period the student will have earned six hours.

01:09:45.891 --> 01:09:47.651

d have a cumulative 27.

01:09:49.021 --> 01:09:52.441

And have 21 hours remaining in the program at the end of.

01:09:52.441 --> 01:09:55.571

this subscription period. But let's.

01:09:55.571 --> 01:09:56.811

look at the disbursements.

01:09:57.381 --> 01:10:00.451

Note that one student came into this payment period. He or she only.

01:10:00.451 --> 01:10:03.511

had 21 hours and we needed what 24?

01:10:03.511 --> 01:10:06.601

hours? So we could not make this disbursement.

01:10:06.601 --> 01:10:09.801

until the student had completed three additional hours at the point.

01:10:09.801 --> 01:10:12.891

where the student completed those hours, we could go ahead and make.

01:10:12.891 --> 01:10:16.091

that disbursement for our subscription.

01:10:16.091 --> 01:10:18.611

period #4. And that's indeed what happened here.

01:10:19.601 --> 01:10:22.651

So before we move on, note that there only 21.

01:10:22.651 --> 01:10:26.061

hours in the program remaining at the end of this subscription period.

01:10:26.061 --> 01:10:29.411

Now we're going to move into our third borrower.

01:10:29.411 --> 01:10:33.051

based academic year, and we are in subscription period #5.

01:10:33.051 --> 01:10:33.051

01:10:33.901 --> 01:10:36.961

In the summer and again, the student loan for 12.

01:10:36.961 --> 01:10:40.621

hours. At this point we need 36 hours.

01:10:40.621 --> 01:10:42.401

that are.

01:10:43.961 --> 01:10:45.601

Are required for disbursement.

01:10:46.881 --> 01:10:50.291

And you can see and as you'll note at the.

01:10:50.291 --> 01:10:53.331

from the previous period, the student does not have that number.

01:10:53.331 --> 01:10:54.001

of hours.

01:10:54.591 --> 01:10:57.761

So hours earned in this period are going.

01:10:57.761 --> 01:10:58.631

to be.

01:10:59.781 --> 01:11:03.241

6-6 hours for a total of 33 15.

01:11:03.241 --> 01:11:07.101

hours remaining in the program at the end of at the.

01:11:07.101 --> 01:11:10.281

the end of this subscription period, so we know that the student needs.

01:11:10.281 --> 01:11:12.441

to have 36 hours to be paid here.

01:11:13.061 --> 01:11:16.091

But what he doesn't have that right? So we see.

01:11:16.091 --> 01:11:19.251

here, no payment is student has completed 36 hours and.

01:11:19.251 --> 01:11:22.831

the student doesn't complete that 36 hours within that entire summer.

01:11:22.831 --> 01:11:25.951

So all the students coming in and attending but the student.

01:11:25.951 --> 01:11:29.151

doesn't get to the requisite number of hours during that period of time.

01:11:29.151 --> 01:11:29.151

01:11:30.651 --> 01:11:33.901

However, when the student does get that number of hours.

01:11:33.901 --> 01:11:37.361

in the next subscription period, which is going to be the fall?

01:11:37.361 --> 01:11:41.121

we will be able to pay that student as a as a.

01:11:41.121 --> 01:11:44.461

as a late disbursement. Note that when we get here, there's.

01:11:44.461 --> 01:11:47.531

not going to be any for the fall. There's not going to be any.

01:11:47.531 --> 01:11:47.531

01:11:48.121 --> 01:11:49.611

Title 4 eligibility.

01:11:50.341 --> 01:11:53.441

Because the number of hours remaining now equals or exceeds the number.

01:11:53.441 --> 01:11:56.481

of hours in the program. But remember that the student.

01:11:56.481 --> 01:11:57.251

has not.

01:11:58.731 --> 01:12:01.761

Been paid that disbursement.

01:12:01.761 --> 01:12:04.881

for subscription period #5.

01:12:04.881 --> 01:12:08.061

and why did this didn't get paid? Because the student didn't get to.

01:12:08.061 --> 01:12:11.321

that requisite number of hours. So at this point.

01:12:11.321 --> 01:12:11.321

01:12:13.191 --> 01:12:16.351

The we can we move here and one student.

01:12:16.351 --> 01:12:19.381

dent has completed those three additional hours.

01:12:19.381 --> 01:12:19.381

01:12:21.351 --> 01:12:24.541

He can receive the late disbursement, and.

01:12:24.541 --> 01:12:27.811

he does get that there's no payment at the beginning of that payment period.

01:12:27.811 --> 01:12:31.201

But once the student have, after having completed the six, he.

01:12:31.201 --> 01:12:34.311

did complete 6 hours and that's in that SP.

01:12:34.311 --> 01:12:37.471

Five in the subscription period. #5, but didn't.

01:12:37.471 --> 01:12:40.511

vail him anything because he didn't get to the 36.

01:12:40.511 --> 01:12:43.721

hours he needed, right? We can see here you got the six, but was only.

01:12:43.721 --> 01:12:47.021

at 33 at the end of that payment period, so there was nothing.

01:12:47.021 --> 01:12:50.191

that could be done for that student. He still needs.

01:12:50.191 --> 01:12:50.941

3 hours.

01:12:50.991 --> 01:12:54.011

He rolls into the fall, and at the point at which he.

01:12:54.011 --> 01:12:57.101

gets those three hours is not eligible for a fall.

01:12:57.101 --> 01:13:00.151

disbursement, but he can get the disbursement as.

01:13:00.151 --> 01:13:02.811

a late disbursement that's associated with the summer.

01:13:03.411 --> 01:13:06.561

It's important that we note that the loan was.

01:13:06.561 --> 01:13:09.601

originated for single term.

01:13:09.601 --> 01:13:12.621

and you want to make certain that the that.

01:13:12.621 --> 01:13:15.931

was originated and we can go ahead and do that even though.

01:13:15.931 --> 01:13:19.361

we couldn't pay the student alone until you have the requisite number of hours important.

01:13:19.361 --> 01:13:22.611

that the loan is originative while the student is still eligible. Otherwise there would.

01:13:22.611 --> 01:13:26.111

be no late disbursement if you waited until after the student had earned

01:13:26.111 --> 01:13:29.201

those hours to originate the loan, that wouldn't be possible.

01:13:29.201 --> 01:13:32.301

so it was originatedback here and because of that the student could.

01:13:32.301 --> 01:13:33.311

receive that.

01:13:33.461 --> 01:13:37.441

Loan disbursement and the Pell disbursement once.

01:13:37.441 --> 01:13:39.251

once the repquisite number of hours were earned.

01:13:43.271 --> 01:13:46.381

OK, finally some references that Dave promised you.

01:13:46.381 --> 01:13:49.811

earlier in the presentation here, so let's take a look at those.

01:13:49.811 --> 01:13:52.921

We have the distance innovation, I'm sorry. Distance, education and.

01:13:52.921 --> 01:13:55.981

innovation, final Rule and the link to that. Remember as.

01:13:55.981 --> 01:13:59.821

I think that Nastasha pointed out earlier, those were September.

01:13:59.821 --> 01:14:03.221

2nd, 2020 regulations.

01:14:03.221 --> 01:14:06.351

that take effect July 1 and also the 20.

01:14:06.351 --> 01:14:09.441

20 FSA conference. There was a regulatory update.

01:14:09.441 --> 01:14:11.501

for distance education and innovation.

01:14:11.551 --> 01:14:14.821

That we did for a virtual conference this year, and.

01:14:14.821 --> 01:14:16.241

the link to those.

01:14:16.891 --> 01:14:20.061

Slides and in fact, that whole recorded presentation.

01:14:20.061 --> 01:14:21.251

is available for you there.

01:14:23.271 --> 01:14:26.281

And with that I'm going to, well, first of all.

01:14:26.281 --> 01:14:27.921

say if you have any questions.

01:14:28.821 --> 01:14:31.921

Please submit them through our new customer support process.

01:14:31.921 --> 01:14:35.271

and FSA's partner Connect, help Center and your given the address there.

01:14:36.691 --> 01:14:40.341

and to submit a question about one of the topics in this webinar, please.

01:14:40.341 --> 01:14:41.391

complete the form.

01:14:42.041 --> 01:14:46.061

And select the topic FSA ask aFEd Slash.

01:14:46.061 --> 01:14:46.811

policy.

01:14:47.421 --> 01:14:50.911

I'm now going to turn it over to Pam. My colleague Pam for the question and.

01:14:50.911 --> 01:14:53.521

answer portion of this presentation Pam.

01:14:54.601 --> 01:14:55.331

Thanks Greg.

01:14:56.111 --> 01:14:59.301

Yeah, we have some questions in our Q& A box, so let's.

01:14:59.301 --> 01:15:02.561

get to them. Our first question is, what about clock?

01:15:02.561 --> 01:15:05.601

our schools? Can they utilized subscription based program?

01:15:05.601 --> 01:15:05.601

01:15:08.741 --> 01:15:11.811

So thanks nATasha, the answer is no.

01:15:11.811 --> 01:15:15.191

because subscription based programs are.

01:15:15.191 --> 01:15:18.261

by definition term based programs and clock.

01:15:18.261 --> 01:15:21.411

hour programs cannot use terms you cannot have.

01:15:21.411 --> 01:15:24.451

a subscription based program that uses clock hours it.

01:15:24.451 --> 01:15:25.641

has to be credit hours.

01:15:27.851 --> 01:15:28.751

Thanks David.

01:15:29.561 --> 01:15:32.771

Our next question, does the institution need to?

01:15:32.771 --> 01:15:35.791

seek approval from their credit are in order to use

01:15:35.791 --> 01:15:39.801

subscription based programs and thus the subscription based calendar?

01:15:39.801 --> 01:15:39.801

01:15:43.841 --> 01:15:46.091

So Greg, I'll take this one as well.

01:15:47.391 --> 01:15:50.441

The answer, I think would actually depend on the.

01:15:50.441 --> 01:15:53.901

accreditors requirements. If the accrediting agency.

01:15:53.901 --> 01:15:57.041

considered this to be a program.

01:15:57.041 --> 01:16:00.141

that new program that constitute or does substantive.

01:16:00.141 --> 01:16:03.221

change for your institution, then you may need.

01:16:03.221 --> 01:16:06.821

to seek their approval before offering it, but.

01:16:06.821 --> 01:16:09.881

there's no specific regulation in the.

01:16:09.881 --> 01:16:12.901

department's regulations that requires that it's really up to the.

01:16:12.901 --> 01:16:15.921

accreditor as to whether these programs would be a diversion from.

01:16:15.921 --> 01:16:18.181

what you've done in the past that would require a

01:16:18.261 --> 01:16:19.331

Specific approval.

01:16:21.441 --> 01:16:21.981

OK.

01:16:23.361 --> 01:16:26.511

Next question, if a student changes from one subscription.

01:16:26.511 --> 01:16:29.711

period program to another, does the running total?

01:16:29.711 --> 01:16:33.171

of credits need to restart? the

01:16:33.171 --> 01:16:36.781

Enquirer Is questioning or assuming if.

01:16:36.781 --> 01:16:39.811

just changes versions of the same program?

01:16:39.811 --> 01:16:42.191

that running total will not restart?

01:16:49.211 --> 01:16:52.421

It right, they wouldn't restart. They in the same yeah.

01:16:52.421 --> 01:16:56.281

and it transfers in the same program that they obviously they their their.

01:16:56.281 --> 01:16:59.481

cumulative at that point.

01:16:59.481 --> 01:16:59.481

01:17:00.811 --> 01:17:04.011

The David, i don’t know if We've really discussed the transfers.

01:17:04.011 --> 01:17:06.071

from one subscription based program to another.

01:17:08.351 --> 01:17:11.771

Look, I think we have to take that one back so.

01:17:11.771 --> 01:17:14.841

for the person who asked that question, I would.

01:17:14.841 --> 01:17:18.081

recommend that you submit that one to the.

01:17:18.081 --> 01:17:21.281

website that you see here on the screen and we would be glad.

01:17:21.281 --> 01:17:24.751

to do a little bit more research for you and provide an answer.

01:17:24.751 --> 01:17:24.751

01:17:28.301 --> 01:17:28.841

Right?

01:17:30.271 --> 01:17:33.941

If in a less than half time program version of a subscription.

01:17:33.941 --> 01:17:37.431

based program is the annual commitment to enrollment status.

01:17:37.431 --> 01:17:41.181

slash academic plans still required the.

01:17:41.181 --> 01:17:44.261

questioner references slide 15.

01:17:44.261 --> 01:17:47.621

requirement to document Student has committed to at least.

01:17:47.621 --> 01:17:48.871

1/2 time enrollment.

01:17:52.061 --> 01:17:53.511

That's a great question.

01:17:55.011 --> 01:17:58.081

If you have a less than half time version of your program.

01:17:58.081 --> 01:18:01.281

then the student will be considered less than half time in every.

01:18:01.281 --> 01:18:05.291

single payment period, so.

01:18:05.291 --> 01:18:08.841

you would not be eligible for direct loans and you would already be using.

01:18:08.841 --> 01:18:12.081

a cost of attendance for less than half time student so.

01:18:12.081 --> 01:18:15.281

you would not need to do that specific academic.

01:18:15.281 --> 01:18:18.481

plan check on the students intended enrollment.

01:18:18.481 --> 01:18:22.081

If you're in the less than halftime version of a program, that's a great question.

01:18:22.081 --> 01:18:22.081

01:18:23.801 --> 01:18:27.171

Very good now let's switch to slide 45.

01:18:27.171 --> 01:18:29.411

where there's a question about the example.

01:18:30.531 --> 01:18:33.741

If the student doesn't complete the required 4 hours.

01:18:33.741 --> 01:18:36.841

until sometime in the next subscription period and in.

01:18:36.841 --> 01:18:40.311

this case the person writes down AY 3 fall.

01:18:40.311 --> 01:18:43.481

do you pay the student for the academic year 2?

01:18:43.481 --> 01:18:45.371

spring term after the fact?

01:18:46.001 --> 01:18:49.371

There are few more attached questions, so that doesn't depend on whether.

01:18:49.371 --> 01:18:52.651

the student qualifies for late disbursement rules for academic.

01:18:52.651 --> 01:18:55.831

year 2 spring, or is the student not eligible?

01:18:55.831 --> 01:18:58.921

for any aid for academic year 2 spring term?

01:18:58.921 --> 01:19:01.971

and will now need to meet the applicable requirements for.

01:19:01.971 --> 01:19:03.531

academic year three fall.

01:19:08.911 --> 01:19:09.851

That's a lot, I know.

01:19:13.831 --> 01:19:16.961

Then we put. We put this slide up. Maybe we could if you could put that slide.

01:19:16.961 --> 01:19:20.061

back up would be helpful as well. The slide 45.

01:19:20.061 --> 01:19:21.961

45.

01:19:30.271 --> 01:19:33.111

OK, so again the question was.

01:19:34.841 --> 01:19:35.071

Yep.

01:19:36.991 --> 01:19:37.641

Yeah, go ahead.

01:19:42.211 --> 01:19:45.361

Go ahead and repeat the question. Pam, sorry I was a lot.

01:19:45.361 --> 01:19:45.361

01:19:46.591 --> 01:19:49.791

Yeah, give you a chance to take a look at this slide. Yeah it doesn't.

01:19:49.791 --> 01:19:53.261

complete the required for hours until sometime in the next subscription.

01:19:56.371 --> 01:19:59.521

Do you pay the student for the academic year 2 spring?

01:19:59.521 --> 01:20:00.581

after the fact?

01:20:01.231 --> 01:20:04.821

Does it depend on whether the student qualifies for late disbursement?

01:20:04.821 --> 01:20:05.991

rule for academic?

01:20:07.851 --> 01:20:11.111

Or is the student not eligible for any aid for the.

01:20:11.111 --> 01:20:14.121

academic year 2 spring term and will now need to meet the.

01:20:14.121 --> 01:20:16.321

applicable requirements academic years?

01:20:23.051 --> 01:20:26.161

So I think I have a good idea of what the questioner is asking now that I’ve looked at the slide a bit

01:20:30.461 --> 01:20:33.671

So in this case, I think they're asking Greg.

01:20:33.671 --> 01:20:37.351

if the if the student is eligible for.

01:20:37.351 --> 01:20:38.631

subscription period.

01:20:40.061 --> 01:20:43.331

So I think we have the wrong number here. That may be why this confusion.

01:20:43.331 --> 01:20:46.551

omes in. This is really subscription period #4 here.

01:20:46.551 --> 01:20:46.551

01:20:48.951 --> 01:20:52.481

Assuming that the student.

01:20:52.481 --> 01:20:55.741

they haven't completed their credits and they don't complete it.

01:20:55.741 --> 01:20:58.921

throughout subscription period 4 here when they get.

01:20:58.921 --> 01:21:01.931

into subscription period #5 as soon.

01:21:01.931 --> 01:21:05.161

as they complete 18 credits, they'll qualify.

01:21:05.161 --> 01:21:08.411

or that prior disbursement back from subscription period.

01:21:08.411 --> 01:21:11.761

4 and then if they.

01:21:11.761 --> 01:21:14.901

they continue to work at a rapid pace they.

01:21:14.901 --> 01:21:18.301

can still qualify for aid in that next subscription.

01:21:18.301 --> 01:21:19.711

period as well.

01:21:19.761 --> 01:21:22.791

But in that period the completion requirement will be 24.

01:21:22.791 --> 01:21:25.961

so they'll have to keep working to get to that 24 mark.

01:21:25.961 --> 01:21:27.791

in order to get the next disbursement.

01:21:33.791 --> 01:21:37.381

OK, I'm considering adding a subscription.

01:21:37.381 --> 01:21:40.521

based program as students move from one subscription.

01:21:40.521 --> 01:21:43.541

period to another and then another and another without.

01:21:43.541 --> 01:21:46.941

completing the required credits to receive the second disbursement.

01:21:46.941 --> 01:21:49.961

Can I assess subscription fees?

01:21:49.961 --> 01:21:53.201

like tuition for each new subscription period?

01:21:53.201 --> 01:21:56.471

the student needs in order to complete the required credits?

01:21:56.471 --> 01:21:56.471

01:21:58.611 --> 01:22:06.481

01:22:09.311 --> 01:22:12.741

Yeah, yes you can. I mean, that is one of the inherent.

01:22:16.321 --> 01:22:16.561

01:22:19.061 --> 01:22:21.811

We know where this subscription period, the student.

01:22:23.211 --> 01:22:27.261

When sufficient period is moved through as an institution is.

01:22:27.261 --> 01:22:30.041

allowed to charge for additional subscription periods.

01:22:33.211 --> 01:22:36.361

OK, then I'll hand it off to Natasha now to cover.

01:22:36.361 --> 01:22:37.471

the rest of the questions.

01:22:39.001 --> 01:22:40.191

Thank you Pam.

01:22:42.101 --> 01:22:45.131

Our next question says which Pell formulas should.

01:22:45.131 --> 01:22:47.661

we use for the subscription based program?

01:22:49.601 --> 01:22:51.341

That'll depend on.

01:22:51.951 --> 01:22:55.251

It depends on a lot of things, but depends on the kinds.

01:22:55.251 --> 01:22:58.711

of terms that you're using for your subscription based program.

01:22:58.711 --> 01:23:01.951

So if you are using standard terms.

01:23:01.951 --> 01:23:05.541

you would you Pell Formula One hand if.

01:23:05.541 --> 01:23:08.951

you were using for example, terms that are.

01:23:08.951 --> 01:23:12.391

that together comprise less than.

01:23:12.391 --> 01:23:15.551

30 weeks of instructional time. So now let's do an example.

01:23:15.551 --> 01:23:18.701

of two semesters that are both 14 weeks each.

01:23:18.701 --> 01:23:21.751

Let's say you had two subscription periods that were both 14.

01:23:21.751 --> 01:23:24.271

weeks each. You treat them as semesters.

01:23:24.721 --> 01:23:27.851

Those semesters are still shorter than.

01:23:27.851 --> 01:23:31.031

30 weeks instructional time, so that would require you to use.

01:23:31.031 --> 01:23:34.491

Pell Formula Two. Most schools don't use Pell formula.

01:23:34.491 --> 01:23:38.051

Two because it has some additional complications.

01:23:38.051 --> 01:23:41.281

and similarly, if you have terms of.

01:23:41.281 --> 01:23:44.501

somewhat unequal length, you may have to you spell formula 3.

01:23:44.501 --> 01:23:47.811

But really, the answer is it depends on the.

01:23:47.811 --> 01:23:51.871

kind of term that using, just like it would in a traditional term based program.

01:23:51.871 --> 01:23:51.871

01:23:53.131 --> 01:23:54.441

Thank you David.

01:23:55.491 --> 01:23:58.521

If a student withdraws from a period in which they were.

01:23:58.521 --> 01:24:01.581

ineligible because they had not reached the.

01:24:01.581 --> 01:24:05.001

required credits, would no.

01:24:05.001 --> 01:24:08.061

R2T4 be required or

01:24:08.061 --> 01:24:11.211

would you do one based on what the student

01:24:11.211 --> 01:24:12.961

should have been eligible for?

01:24:20.881 --> 01:24:24.001

So within our 24 and not be required or.

01:24:24.001 --> 01:24:27.461

would you do R2T4 based on what the student?

01:24:27.461 --> 01:24:29.241

should have been eligible for?

01:24:30.721 --> 01:24:33.771

So I I'm going to defer to Greg on this one.

01:24:33.771 --> 01:24:36.971

but my thought on this would be if.

01:24:36.971 --> 01:24:40.401

the student drops out before they complete the requisite.

01:24:40.401 --> 01:24:43.611

number of credits to receive a disbursement for subscription.

01:24:43.611 --> 01:24:46.771

period, then they'll never receive disbursements for that.

01:24:46.771 --> 01:24:49.951

subscription period, so they would not need to complete.

01:24:49.951 --> 01:24:52.991

a return to title for calculation because there's no way for them.

01:24:52.991 --> 01:24:56.871

to qualify for that period. Yeah I agree they.

01:24:56.871 --> 01:25:00.351

there would be no, you wouldn't even have any aid that could have been disbursed at that point, because.

01:25:00.351 --> 01:25:00.351

01:25:00.731 --> 01:25:03.981

You never got to the point where student was even eligible for that.

01:25:03.981 --> 01:25:07.011

For any aid for that period, it's I think it's.

01:25:07.011 --> 01:25:10.121

kind of confusing because these types of programs are.

01:25:10.121 --> 01:25:10.121

01:25:11.371 --> 01:25:14.381

The lot different conceptually that we used to with the term based program.

01:25:14.381 --> 01:25:15.751

where you're applying this.

01:25:16.881 --> 01:25:20.751

We're all very familiar with a set number of.

01:25:20.751 --> 01:25:23.911

this set time period, within which course.

01:25:23.911 --> 01:25:26.961

work takes place, and you're not allowed to have any overlap anything here.

01:25:26.961 --> 01:25:30.611

you've got this student moving into that next period still.

01:25:30.611 --> 01:25:33.751

with the aim of being able to achieve.

01:25:33.751 --> 01:25:36.951

the number of credits to be eligible, but because they haven't.

01:25:36.951 --> 01:25:40.181

achieved that number of hours, it's just like they're just simply.

01:25:40.181 --> 01:25:43.831

not eligible for aid at all at the point at which they withdraw.

01:25:43.831 --> 01:25:43.831

01:25:45.721 --> 01:25:48.981

So now it was. So yes, you wouldn't be required to do anything.

01:25:48.981 --> 01:25:52.091

but simply document the student wasn't eligible for need for that period.

01:25:52.091 --> 01:25:55.531

and there be no R2T4 calculation necessary.

01:25:55.531 --> 01:25:57.651

Thank you, Greg.

01:25:58.521 --> 01:26:02.201

Next question can of course that does not occur.

01:26:02.201 --> 01:26:02.201

01:26:02.831 --> 01:26:06.001

At all during the subscription period be counted.

01:26:06.001 --> 01:26:08.431

towards a subscription period’s pell.

01:26:09.371 --> 01:26:11.721

Attended enrollment status.

01:26:14.861 --> 01:26:17.901

That's part one of the question and then.

01:26:17.901 --> 01:26:18.961

there's an example.

01:26:19.921 --> 01:26:23.381

If in a full time program and.

01:26:23.381 --> 01:26:26.681

only starts attendants in nine credits during the subscription.

01:26:26.681 --> 01:26:29.941

period, can the first three credit course that.

01:26:29.941 --> 01:26:33.501

starts in the next subscription?

01:26:33.501 --> 01:26:36.591

period be counted towards?

01:26:36.591 --> 01:26:39.911

the prior term’s pell enrollment status?

01:26:39.911 --> 01:26:39.911

01:26:42.841 --> 01:26:45.891

And then there's another note that says maybe this will help a little.

01:26:45.891 --> 01:26:48.971

more. Count the three credit course from the.

01:26:48.971 --> 01:26:52.551

next subscription period after.

01:26:52.551 --> 01:26:53.711

that has been attended.

01:26:59.531 --> 01:27:02.861

I think we were actually just talking about this very thing, right? Yeah.

01:27:02.861 --> 01:27:06.001

I will take a shot at that. You have to so remember.

01:27:06.001 --> 01:27:09.221

the rules again. Or you can only pay once for any for any.

01:27:09.221 --> 01:27:12.091

for any course and the student has to have.

01:27:16.181 --> 01:27:19.671

Has to have that course. You have to have.

01:27:19.671 --> 01:27:22.891

that course. Would have some of that course would have to reside in that payment.

01:27:22.891 --> 01:27:26.171

period. So in the example I think Dave and maybe.

01:27:26.171 --> 01:27:29.031

play this out in the example where you had.

01:27:30.601 --> 01:27:33.751

3 credits counting for.

01:27:33.751 --> 01:27:37.291

the previous period that never.

01:27:37.291 --> 01:27:37.291

01:27:37.901 --> 01:27:41.031

Never take place in that period of time or I'm.

01:27:41.031 --> 01:27:44.591

sorry. Don't take place at all until the until the next.

01:27:44.591 --> 01:27:47.621

payment. Can you move it back, can you?

01:27:47.621 --> 01:27:50.801

move it back into the previous one? I would say no, you can't.

01:27:50.801 --> 01:27:52.611

do that. You can move.

01:27:54.691 --> 01:27:57.791

You can move some forward if a student.

01:27:57.791 --> 01:28:01.061

is enrolled in 15 credit hours.

01:28:01.061 --> 01:28:04.841

only 12 being required for enrollment, and you have 3.

01:28:04.841 --> 01:28:08.081

credits that.

01:28:08.081 --> 01:28:11.241

move into the subsequent subsequent subscription period, you.

01:28:11.241 --> 01:28:14.581

could count that towards the next enrollment for that period.

01:28:14.581 --> 01:28:17.591

Dave, you wanted that. Or yeah, I think.

01:28:17.591 --> 01:28:20.661

that's exactly right. The at least some.

01:28:20.661 --> 01:28:23.761

part of the class has to occur.

01:28:23.761 --> 01:28:26.921

in the subscription period for you to count it for.

01:28:26.921 --> 01:28:26.921

01:28:26.971 --> 01:28:30.171

For Pell, Grant or General Title 4 attendance.

01:28:30.171 --> 01:28:33.491

purposes. So if you have a class that starts.

01:28:33.491 --> 01:28:36.851

in subscription period 3 and no.

01:28:36.851 --> 01:28:40.421

part of it took place in subscription period 2 you.

01:28:40.421 --> 01:28:43.721

can't. You cannot count that class for subscription.

01:28:43.721 --> 01:28:47.141

period. Two is attendance. So in the example.

01:28:47.141 --> 01:28:50.301

given, this school would have to pay that student at 3/4.

01:28:50.301 --> 01:28:53.671

time tell because they were they only ultimately attended.

01:28:53.671 --> 01:28:57.221

three classes during that subscription period.

01:28:57.221 --> 01:28:57.221

01:28:57.661 --> 01:29:00.721

I mean, I think when we look at this, we leave this slide up a little bit like for.

01:29:00.721 --> 01:29:03.911

instance this English class. Here you see associated with subscription period.

01:29:03.911 --> 01:29:07.181

three we have the arrow going back to.

01:29:07.181 --> 01:29:10.211

into subscription period two if that course

01:29:10.211 --> 01:29:13.251

started in two and let's just say that wasn't that course wasn't.

01:29:13.251 --> 01:29:16.511

necessary to achieve the full time enrollment status for two.

01:29:16.511 --> 01:29:19.611

You already had enough coursework to get the 12 credit.

01:29:19.611 --> 01:29:22.871

hours and that could have even started.

01:29:22.871 --> 01:29:26.561

in in 2 And now it's continuing into 3.

01:29:26.561 --> 01:29:28.801

You can pay for it.

01:29:29.021 --> 01:29:32.051

You can count it towards your own status and three because some part of.

01:29:32.051 --> 01:29:35.081

it does take place in three and you're not counting it twice, you didn't.

01:29:35.081 --> 01:29:38.091

count it towards the enrollment status in 2, because you already had 12.

01:29:38.091 --> 01:29:41.311

hours to make up that enrollment status. So now that's rolling.

01:29:41.311 --> 01:29:44.431

over into three and can be counted in three because.

01:29:44.431 --> 01:29:47.581

some part of it does take place in three and you're not double counting it.

01:29:47.581 --> 01:29:47.581

01:29:48.661 --> 01:29:50.581

OK, thank you Greg.

01:29:52.171 --> 01:29:54.081

The next question says.

01:29:55.831 --> 01:29:58.951

In your examples, the students does not enroll in.

01:29:58.951 --> 01:30:02.331

summer, however in subscription.

01:30:02.331 --> 01:30:05.771

students can still be in a course from one session.

01:30:05.771 --> 01:30:09.331

to the next. So in your example, if.

01:30:09.331 --> 01:30:12.881

the student was still finishing a course in summer, which.

01:30:12.881 --> 01:30:16.091

they began in the spring, does the student now have?

01:30:16.091 --> 01:30:19.531

to be considered enrolled in the summer or as long?

01:30:19.531 --> 01:30:22.651

as they do not enroll in new courses in the summer?

01:30:22.651 --> 01:30:25.321

they are not considered enrolled?

01:30:28.661 --> 01:30:31.451

That's another great question. We got a lot of good questions today.

01:30:33.061 --> 01:30:36.261

So so Greg I think we can answer this one, though.

01:30:36.261 --> 01:30:39.551

actually think the questioner points to something important.

01:30:39.551 --> 01:30:42.961

which is that if a student is just wrapping up coursework.

01:30:42.961 --> 01:30:46.431

in a class that's already been counted in a prior subscription.

01:30:46.431 --> 01:30:49.931

period, and they're not starting or doing anything new in.

01:30:49.931 --> 01:30:53.191

the summer, in this example, they.

01:30:53.191 --> 01:30:56.731

would. I think they would consider that because of what we said about.

01:30:56.731 --> 01:31:00.151

you have to document attendance in at least one class.

01:31:00.151 --> 01:31:03.611

for title for purposes. If they don't start any new classes.

01:31:03.611 --> 01:31:07.081

and they've already counted that class in a prior subscription period.

01:31:07.081 --> 01:31:07.081

01:31:07.171 --> 01:31:10.441

Then they would not consider that student to be enrolled in.

01:31:10.441 --> 01:31:13.501

the summer, and that summer would not accumulate.

01:31:13.501 --> 01:31:17.591

towards this to the students credit completion requirement in subsequent terms.

01:31:17.591 --> 01:31:17.591

01:31:18.931 --> 01:31:22.071

No, I don't. I think you're right that wouldn't that wouldn't occur, but what if in?

01:31:22.071 --> 01:31:24.811

this situation we could have a situation where the.

01:31:26.631 --> 01:31:27.141

01:31:27.971 --> 01:31:31.041

Yeah, we could have a situation where the student needs to have.

01:31:31.041 --> 01:31:31.041

01:31:32.071 --> 01:31:35.111

Earned a certain number of credit hours to get to this person for the.

01:31:35.111 --> 01:31:38.211

spring, correct? And he has to go into summer to finish.

01:31:38.211 --> 01:31:40.631

those up. That would be a possibility.

01:31:41.781 --> 01:31:45.081

Yeah, I think if the student ends up having to start anything new.

01:31:45.081 --> 01:31:48.141

in the summer. So if they start a new course in order to qualify.

01:31:48.141 --> 01:31:51.601

for one of those groups, one of requirements that.

01:31:51.601 --> 01:31:55.001

now the student is title 4 eligible in the summer and.

01:31:55.001 --> 01:31:58.031

the credits in that they are part of the summer.

01:31:58.031 --> 01:32:01.671

will count toward their completion requirement in subsequent terms.

01:32:01.671 --> 01:32:05.021

But if it's just a matter of having wrap wrapping up work.

01:32:05.021 --> 01:32:06.041

on prior.

01:32:06.931 --> 01:32:10.481

Courses the student started previously.

01:32:10.481 --> 01:32:13.501

I think we would not consider that to be title 4.

01:32:13.501 --> 01:32:14.901

enrollment for the summer.

01:32:15.671 --> 01:32:17.111

Right I’d agree with that.

01:32:21.581 --> 01:32:25.031

OK, we are moving onto.

01:32:25.031 --> 01:32:28.851

or shorter question it says in example.

01:32:28.851 --> 01:32:32.271

one for the third year spring term.

01:32:32.271 --> 01:32:35.491

If the student finishes the required 3 credits.

01:32:35.491 --> 01:32:38.501

to get the terms aid after spring.

01:32:38.501 --> 01:32:42.521

is over. Can any aid for that period be disbursed?

01:32:42.521 --> 01:32:42.521

01:32:48.501 --> 01:32:51.851

I think the answer is essentially as long as the student.

01:32:51.851 --> 01:32:54.021

meets the late disbursement criteria.

01:32:58.091 --> 01:33:01.341

If it takes them longer than that, then the subscription period.

01:33:01.341 --> 01:33:04.551

that they're working on once that period ends it.

01:33:04.551 --> 01:33:07.581

does become that either a retroactive or alate disbursement and.

01:33:07.581 --> 01:33:10.911

they'll just have to meet the criteria for that in order to get it.

01:33:10.911 --> 01:33:10.911

01:33:12.701 --> 01:33:16.051

Thank you David, and then finally.

01:33:16.051 --> 01:33:19.371

we have a question on page. I'm sorry.

01:33:19.371 --> 01:33:22.491

screen 56. This question is from.

01:33:22.491 --> 01:33:26.471

screen 56. Why not subscription?

01:33:26.471 --> 01:33:30.131

period #6 disbursement if.

01:33:30.131 --> 01:33:33.211

earns the 12 credits and give a.

01:33:33.211 --> 01:33:36.071

late disbursement to like #5.

01:33:42.581 --> 01:33:45.781

I think the question here is why wouldn't?

01:33:45.781 --> 01:33:48.791

the student qualify for yet another disbursement?

01:33:48.791 --> 01:33:50.551

the 6th disbursement?

01:33:51.111 --> 01:33:54.601

And the answer in that case is that remember.

01:33:54.601 --> 01:33:57.871

way back to earlier in the presentation we said that.

01:33:57.871 --> 01:34:01.701

when the number of credits that are required for the disbusment are.

01:34:01.701 --> 01:34:04.921

equal to or greater than the number of hours that.

01:34:04.921 --> 01:34:08.061

are required to complete the program, the student is no.

01:34:08.061 --> 01:34:11.401

longer eligible for Title 4 eligibility. So in.

01:34:11.401 --> 01:34:14.701

subscription period #6 and actually for every.

01:34:14.701 --> 01:34:17.721

subscription period following that, if the student continues to.

01:34:17.721 --> 01:34:21.031

enroll in new subscription periods, they're not title 4 eligible.

01:34:21.031 --> 01:34:23.681

because the number of credits they have to have completed.

01:34:23.821 --> 01:34:26.831

We'll start escalating into 60 and.

01:34:26.831 --> 01:34:30.211

72, etc, and they can never complete that without.

01:34:30.211 --> 01:34:31.811

actually completing the program.

01:34:36.471 --> 01:34:39.501

OK, thank you David andwith that is.

01:34:39.501 --> 01:34:42.911

the end of the questions that we captured.

01:34:42.911 --> 01:34:42.911

01:34:43.921 --> 01:34:47.291

Just going to go and see if there are any more that were added.

01:34:47.291 --> 01:34:47.291

01:34:52.981 --> 01:34:55.661

OK, there is a question in here.

01:34:56.951 --> 01:34:58.101

That says.

01:35:00.681 --> 01:35:03.511

Can transfer credits that come in?

01:35:04.161 --> 01:35:07.571

Count towards the credits required can.

01:35:07.571 --> 01:35:10.831

we allow consortium agreements? Do these.

01:35:10.831 --> 01:35:12.451

courses need to fit?

01:35:13.191 --> 01:35:16.761

And that's in quotations. In the subscription period.

01:35:16.761 --> 01:35:16.761

01:35:19.301 --> 01:35:23.031

Regarding the transfer credits, I mean you could yeah, certainly as.

01:35:23.031 --> 01:35:26.381

any of the program you can transfer credits in, but they're not going to count.

01:35:29.681 --> 01:35:32.891

In a period that's they would they, would they?

01:35:32.891 --> 01:35:36.141

would come in and be whatever they are.

01:35:36.141 --> 01:35:39.211

and put the student.

01:35:39.211 --> 01:35:40.761

at that point in the program.

01:35:42.791 --> 01:35:45.851

However, they wouldn't advance.

01:35:45.851 --> 01:35:48.961

You can't, then you're not gonna be able to pay the student.

01:35:48.961 --> 01:35:52.171

for hours already earned as transferred in.

01:35:52.171 --> 01:35:54.291

As far as consortium agreements are concerned.

01:35:55.561 --> 01:35:59.051

I don't think anything would Dave. You can correct me. I don't think there's anything.

01:35:59.051 --> 01:36:02.191

that would preclude it consortium agreement I think.

01:36:02.191 --> 01:36:05.491

it would be a little more difficult in a subscription based environment.

01:36:05.491 --> 01:36:08.691

Then. Perhaps it would be in a standard term setting.

01:36:08.691 --> 01:36:12.531

where you're just concerned about.

01:36:12.531 --> 01:36:15.711

accepting credits that the student has earned as another.

01:36:15.711 --> 01:36:18.921

institution. Because you're looking at, you're looking.

01:36:18.921 --> 01:36:22.361

at these subscription periods and how that how those subscription.

01:36:22.361 --> 01:36:24.381

period would come into play at another.

01:36:25.721 --> 01:36:28.891

And another institution. Now if the question.

01:36:28.891 --> 01:36:32.191

is if you've got a subscription based program, could.

01:36:32.191 --> 01:36:35.151

you execute a consortium agreement for a student to?

01:36:36.001 --> 01:36:39.481

To take credits at another another program.

01:36:39.481 --> 01:36:41.161

that wasn't subscription based.

01:36:44.241 --> 01:36:47.871

I that's a good. That's a good question. I guess. You guess you could.

01:36:47.871 --> 01:36:50.881

but you still have to apply your subscription periods right to those.

01:36:50.881 --> 01:36:54.341

hours. Yeah, I think that's right I think.

01:36:54.341 --> 01:36:57.461

what we would say is that in it, unlike in the traditional.

01:36:57.461 --> 01:37:00.521

term environment, the subscription period is.

01:37:00.521 --> 01:37:03.541

going to be static in that case. And the.

01:37:03.541 --> 01:37:06.761

consortium agreement coursework, much like the students.

01:37:06.761 --> 01:37:10.261

Other coursework can take place at any time, but the school is.

01:37:10.261 --> 01:37:13.601

still going to have to meet all of the right requirements.

01:37:13.601 --> 01:37:16.801

that it would under under other circumstances, so it will have to make.

01:37:16.801 --> 01:37:18.171

sure the student attends.

01:37:18.261 --> 01:37:21.371

The courses during the appropriate time frame it have.

01:37:21.371 --> 01:37:24.531

to track when the student completes in through the consortium.

01:37:24.531 --> 01:37:27.641

agreement in order to provide new disbursements. All of those kinds.

01:37:27.641 --> 01:37:30.991

of things, but I don't see anything that would prevent the school from.

01:37:30.991 --> 01:37:33.251

having a consortium agreement. I agree, Greg.

01:37:35.461 --> 01:37:38.061

Thank you Greg and David. We do have.

01:37:39.061 --> 01:37:42.191

One more question, we want to try to squeeze in slide 55.

01:37:42.191 --> 01:37:45.521

for borrower base, academic year and #3.

01:37:45.521 --> 01:37:45.531

01:37:46.181 --> 01:37:49.981

Report as halftime to NSLDS.

01:37:49.981 --> 01:37:53.081

The question is, do we still report as full time?

01:37:53.081 --> 01:37:56.721

to COD or update to halftime since it?

01:37:56.721 --> 01:37:59.821

is final remaining period of?

01:37:59.821 --> 01:38:03.241

study since it is the final remaining period of study?

01:38:03.241 --> 01:38:03.241

01:38:08.631 --> 01:38:11.661

There's another really great question this.

01:38:11.661 --> 01:38:14.731

is actually one that we did discuss and.

01:38:14.731 --> 01:38:18.101

the answer is that if there's only 6 credits remaining.

01:38:18.101 --> 01:38:21.461

in the final remaining period of study, you.

01:38:21.461 --> 01:38:24.701

would report that student to the NSLDS's halftime.

01:38:24.701 --> 01:38:26.591

for that very last period.

01:38:28.151 --> 01:38:31.161

OK, thank you so much for that quick answer.

01:38:31.161 --> 01:38:34.381

And now with the time remaining I'm going to turn it over.

01:38:34.381 --> 01:38:35.231

to Pam.

01:38:36.341 --> 01:38:38.151

Unless there are any other comments.

01:38:41.751 --> 01:38:44.691

Nothing from me great questions today.

01:38:47.021 --> 01:38:50.151

Thank you everybody and there are still questions.

01:38:50.151 --> 01:38:53.211

coming into the chat, so would you like to give instruction on how?

01:38:53.211 --> 01:38:54.671

those will be dealt with?

01:38:58.811 --> 01:39:01.841

That's right, so if the if the.

01:39:01.841 --> 01:39:05.001

folks who ask questions that we weren't able to get.

01:39:05.001 --> 01:39:08.361

to today, we would encourage you to send.

01:39:08.361 --> 01:39:11.741

those questions to the website again that you see here on your screen.

01:39:11.741 --> 01:39:11.741

01:39:13.051 --> 01:39:16.121

Partners that Gov Help Center contact customer.

01:39:16.121 --> 01:39:19.181

support. Once we receive questions through this.

01:39:19.181 --> 01:39:22.401

mailbox so we can put it through our evaluation.

01:39:22.401 --> 01:39:25.681

process and will get back to you in writing, but we'd.

01:39:25.681 --> 01:39:28.801

like to thank you all for your many questions and for your.

01:39:28.801 --> 01:39:29.781

participation today.

01:39:32.321 --> 01:39:35.501

Thank you David again. As David just said.

01:39:35.501 --> 01:39:38.561

thank you for joining us in today's webinar. Again, you.

01:39:38.561 --> 01:39:41.671

can see on your screen that questions can be submitted.

01:39:41.671 --> 01:39:45.041

through our customer support help center through the FSA partners.

01:39:45.041 --> 01:39:48.921

Dot ed Dot gov slash help Hyphen.

01:39:48.921 --> 01:39:50.081

Center website.

01:39:50.751 --> 01:39:54.401

This concludes the final web and R in the Office of Postsecondary.

01:39:54.401 --> 01:39:57.921

Education Series on the Distance Education an innovation.

01:39:57.921 --> 01:39:58.741

regulations.

01:39:59.471 --> 01:40:02.551

Don't forget to keep an eye out for a future announcement about.

01:40:02.551 --> 01:40:06.521

where to find the recordings and transcripts for each of these presentations.

01:40:06.521 --> 01:40:08.471

and have a great rest of your day.

01:40:08.501 --> 01:40:18.501

01:40:18.501 --> 01:40:25.061