

515.5 Full-Time Attendance (FTA) Defined

Full-time attendance at an EI means enrollment in a day or evening non-correspondence course at least 13 weeks in duration, carrying a subject load which is considered full time under the school's standards and practices for day students, with a scheduled rate of attendance of at least 20 hours per week. The 13 school weeks duration requirement refers to the entire year of study (e.g., a senior year of high school), and not a semester, trimester, summer school session or other segment of the course.

Attendance includes time spent in regularly scheduled laboratory work, supervised study which is available to all students taking the particular course, required changes in student or teacher stations and work which is an integral part of the program of study.

Home schooling cases (see [FOM-I-510.5.3](#)) generally are required to meet the same standard. The home study course should be at least 13-weeks duration and at least 20 hours of study per week.

515.5.1 School Registration Period

A student, who registers for classes in one month and begins classes in the following month, is considered to be in FTA beginning with the month of registration if the school considers the student to be in FTA during registration and there is no break between the end of the registration period and the beginning of classes.

Example 1: A student's registration period runs from August 26 to August 31. The school's classes begin on September 1, and the student's first class is on September 3. The school considers the student in FTA during the registration period. The student is considered to be in FTA for the month of August.

Example 2: A student's registration period runs from August 26 to August 29. The school's classes begin on September 3 and the student's first class is on September 3. The student cannot be considered to be in FTA for the month of August because there was a break between the end of the registration period and the first day of classes (August 30 to September 2).

515.5.2 Attendance Stops Before End of 13 Weeks

If a student is attending a course at least 13 school-weeks' duration, but drops out, or is dropped before completing 13 school weeks, he may still receive an annuity or be included in the O/M computation of the employee's annuity for the months of full time attendance.

515.5.3 Student in Last Part of Course of Study

In some cases, a student who is in the last part of his course of study may need fewer hours or credits than the number of hours or credits required by the school to be in full-time attendance. When such a student is also engaged in study or related activity for which no credit is given (e.g., independent study), he can be considered as being in full-time attendance.

515.5.4 Exceptional Situations

Effective August 1, 1991, student may be considered in full-time attendance with less than 20 hours as long as the student is in full-time attendance pursuant to the school's standards and practices in exceptional situations. Examiners will accept a reasonable explanation of why the student is enrolled for less than 20 hours weekly classroom attendance. Examples of acceptable and unacceptable situations are shown below.

Example 1: John stopped attending school at age 16. At age 18 he enrolled for 16 1/2 hours scheduled classroom attendance in an evening high school program. John explained that he had stopped attending school at age 16 because of illness and now at age 18 was too old to attend a conventional high school. He added that he had enrolled for the maximum number of hours available at the evening high school and that the school considers the evening program equivalent to the day program. John is considered to be in FTA if the school verifies him to be full-time according to its standards and practices. This is an exceptional situation and John has provided a reasonable explanation for his scheduled classroom attendance of less than 20 hours weekly.

Example 2: Patty stopped attending Central High School at age 17. After attaining age 18 she enrolled for 16 1/2 hours scheduled classroom attendance in an evening high school program. Patty explained that she was pregnant and was embarrassed to return to Central High. She added that she had considered enrolling for 20 hours weekly classroom attendance at the evening high school but did not because the school considered 16 1/2 hours to be full-time and she could then have more time to pursue her other interests. Patty is not considered to be in FTA. This is not an exceptional situation and she did not provide a reasonable explanation for her scheduled classroom attendance of less than 20 hours weekly.

However, if Patty enrolls for less than 20 hours scheduled attendance for medical reasons based on her physician's advice, this is an exceptional situation and she has provided a reasonable explanation.

515.5.5 Student in Work-study Program

A student registered in a work-study program is considered to be in full-time attendance during a period in which he is working at a job assigned to him or obtained for him by the school as an integral part of his schooling.

515.5.6 Post-Secondary Level Courses

If the student is attending a post-secondary school which also provides elementary or secondary education, FTA at such a school must be determined without consideration of courses taken beyond the 12th grade level.

515.5.7 School Registration Period

A student is in FTA at an EI during a school registration period if:

- The school considers the student in FTA during registration, and
- There is no break between the end of the registration period and the period during which the school begins classes.

515.5.8 Student in Last Part of Course of Study

In some cases, a student who is in the last part of his course of study may need fewer hours or credits than the number of hours or credits required by the school to be in full-time attendance. When such a student is also engaged in study or related activity for which no credit is given (e.g., independent study), he can be considered as being in full-time attendance.

515.5.9 Month of Graduation

If information is received that a student ceased FTA in a month and returned to school in the following month to attend graduation ceremonies only, the student will be considered in FTA for the month of graduation.

If the student completes graduation requirements and attains age 19 in the same month, the student is in FTA that month. If the student then participates in a graduation ceremony in the following month, student would also be in FTA in the month of graduation.

However, if there is an interval of one or more calendar months between the cessation of FTA and graduation, the student is not entitled after the month of FTA cessation.

515.10 Determining Full-Time Attendance (FTA)

515.10.1 High Schools, Vocational High Schools, Technical, Trade, Business Schools, etc.)

The student is not in FTA if the course study is less than 13 weeks. FTA is established if the school officially states that the student is in FTA according to the school's standards and practices for day students AND the student's SCHEDULED rate of attendance is at least 20 hours per week. Attendance includes time spent in regularly scheduled laboratory work, supervised study which is available to all students taking the particular

course, required changes in student or teacher stations and work which is an integral part of the program of study.

Refer to [FOM-510.15](#) for foreign schools.

515.10.2 General Educational Development (GED) Programs

A GED program is considered a high school-level program regardless of the type of school offering the program if, under the law of the state or other jurisdiction where it is located, the GED program is determined to be an approved elementary or secondary program. A student enrolled in a GED or high school level program (12th grade or below) in a college, community college or a vocational/technical school is a secondary student if the program is approved as such by the state or by a local board of education.

Four known states, Missouri, Iowa, Nebraska and Kansas require state approval for all GED programs. Therefore, all GED programs offered in these states would be considered secondary school FTA.

GED programs offered by post-secondary schools in states other than the states listed above may or may not be approved by the state or local board of education. When necessary to determine if the student is eligible, contact the post-secondary school offering the GED program to determine whether the program has state or local approval.

The rules in [FOM-I-515.10.1](#) apply to determine if a student is in FTA. However, because of the unique nature of GED programs, special adaptations of the rules may be necessary in some cases.

- A. GED Course of indefinite length - Many GED programs are of an indefinite length, i.e., they continue until the student is able to pass a high school equivalency examination. In these instances, the actual length of time the student is in FTA determines whether the 13-week duration requirement is met. In meeting the 13-week duration requirement when the course is of an indefinite length, the student must attend 13 consecutive weeks (allowing for official school breaks) at the scheduled or actual rate of at least 20 hours per week or at a higher rate if the school's standard is higher.

The student will be paid benefits before the expiration of the 13-week period if the student intends to attend for 13 weeks or more. It is immaterial whether the school believes the student could finish the course in less than 13 weeks. When filing for benefits before the 13 weeks has expired, the student should be informed of the 13-week requirement and that failure to be in FTA for this period would result in an overpayment.

- B. School has no FTA standards - In the unusual instance where a school indicates that it has no standards for FTA in a GED program, the district office should document the file to this effect. In these instances, the 20-hour rule discussed in

A above becomes the school's standards for purposes of FTA and, assuming the course is 13 weeks duration (either scheduled or of an indefinite length) and that all other requirements are met, student benefits can be paid.

- C. School does not operate on scheduled attendance - When the school indicates that the GED program does not operate on scheduled attendance, the student may be paid if actual attendance is at the rate of at least 20 hours per week or the school's standards, if higher.

515.10.3 Simultaneous Attendance at More Than One EI

When a student is simultaneously attending more than one EI, the work at the schools may be combined in determining FTA. If one of the EIs would consider the student in FTA if he were taking all of his courses there, consider the student in FTA. When investigating to determine whether the student is in FTA, do not restrict consideration to the confines of one school's program (e.g., if the school contacted does not offer the course for which the student is enrolled at the other school, talk in terms of time spent in any similar course which is offered at that school). If the EI is not a junior college, college or university, the 20-hour per week requirement must be met by combining attendance. Courses taken at a post-secondary school beyond the 12th grade level cannot be considered in determining FTA for other than 1981 Amendment survivor students.

515.10.4 Radio or TV Courses

Some schools, because of a lack of teachers and space, offer as a part of their curriculum courses broadcast by radio or TV. In addition to receiving credits for classroom attendance courses, the student receives credit (if he passes the required examination) toward his diploma for the radio or TV course completed. A student enrolled in a course broadcast by radio or TV is considered in FTA if the school considers him to be in FTA.

515.10.5 Correspondence Courses

Normally FTA cannot be based on correspondence courses even if the school meets the definition of an EI. However, there may be exceptions as in the following example:

EXAMPLE: Susan completed the first semester at the Talbot High School of Illinois, but was unable to attend the second semester due to injuries caused by an accident. Since she expected to recover from her injuries in time to resume FTA at the beginning of the next school year, she arranged to take high school correspondence courses through Indiana University covering the subjects needed to complete her sophomore year. A Talbot high school official stated that full credit would be given for these courses and that Susan was taking sufficient credits to be considered full time. Under these conditions, she is considered in FTA for the second semester and through the summer period of non-attendance.

When a period of "resident training" is part of a correspondence course, the months during which the student is in such resident training may be months of FTA if the student's attendance meets the "20-hours per week test" referred to in [FOM-1-515.10.1](#). The period of resident training need not be of 13 weeks' duration; however, the entire course (correspondence period and resident training) must be scheduled to last at least 13 weeks.

515.10.6 Confinement in Institutions at Public Expense due to Criminal Activity

O/M benefits may be suspended or Tier 1 benefits are converted to all NSSEB effective with the month (including any part of the month) the beneficiary has been convicted of a criminal offense and is confined in an institution at public expense for more than 30 continuous days or is one of the categories of cases defined in [FOM1 150](#).

515.10.7 On-line Courses

Cases involving students taking on-line courses should be referred to P&S-RAC for handling. Before sending the case to P&S-RAC for handling the following information **must** be secured:

- Verification that the school is accredited by the state
- The length of the course study,
- The amount of time the student spends each week performing on-line study.
- Verification of time spent for on-line study. Secure a statement from the school official or the parent, if home schooled,
- The name of the educational institution that will administer the final exam,
- The type of certification that the student will receive (GED or Diploma),
- Name of Educational Institution that will issue the high school diploma or GED.
- A statement from the Educational Institution verifying that they will issue the high school diploma or GED

515.10.8 Home Schooling

Home schooling is a private educational program in which the student is taught within the home by a parent/teacher. It is a program of study completely by choice. A student schooled at home meets the FTA requirements if:

- The student meets the Federal standards for full-time attendance (FTA);

- The law of the State in which the home school is located recognizes home school as an educational institution (EI);
- The home school the student attends meets the requirements of State law in which the home school is located; and
- The student meets all the other requirements for benefits.
- The school considers the student to be FTA based on home visits by a teacher and individual assigned study; and
- The student is expected to complete the course at the same time as student in actual students in actual physical attendance; and
- The student is expected to spend at least 20 hours per week consisting of tutoring by a visiting teacher and individual assigned study.

515.15 Deemed Full-Time Attendance During A Period Of Non-Attendance

A period of non-attendance is any period, in which a student is not attending school, attending less than full-time, or attending a school that is not an EI. The period begins on the first day of the month after the last month in which the student was in FTA and ends on the last day of the month BEFORE the month in which he resumes FTA.

A student who has been in FTA at an EI is deemed to be in FTA during a period of non-attendance if:

- The period of non-attendance is 4 calendar months or less; and
- The student shows intent to continue to be, or is in FTA at an EI immediately following the period of non-attendance.

515.15.1 Establishing Intent to Resume FTA After Period of Non-Attendance

A period of non-attendance is any period in which a student is not attending school, attending less than full-time, or attending a school that is not an EI. The period begins on the first day of the month after the last month in which the student was in FTA and ends on the last day of the month BEFORE the month in which he resumes FTA. Therefore, a student's entitlement can continue during summer vacation and other between-term periods even if he is actually out of school longer than 4 months.

A student's intent to resume FTA is established if the student indicates plans to continue in FTA at the same school, unless there is evidence in file to contradict this. If he plans to attend a different school, and the school is an EI, payments can be made for the period of non-attendance.

If the student has applied or plans to apply for admission to a different school and it is not known whether the school is an EI, develop as explained in [FOM-I-530.25](#).

Do not deem a student in FTA for a period of non-attendance if he has no plans to resume FTA at an EI. If later notice is received that he has applied for admission, plans to apply for admission, or has resumed FTA at an EI, refer to [FOM-I-530](#). If a child attains age 18 in a month which is in a period of non-attendance, you can deem FTA only if you obtain verification of FTA from the school he is currently attending or last attended on a Form G-315a even if he will attend a new school after the period of non-attendance.

515.15.2 Effect of Suspension and Expulsion

A student is considered to have been suspended for other than academic reasons or expelled when, as a result of any action on his part, he is barred from further class attendance. A student is not deemed to be in FTA during a period of non-attendance caused by his expulsion or suspension from school, even if he intends to, and actually does, resume FTA.

The last month the student ordinarily is entitled is the month in which he was suspended or expelled. A student may become entitled again beginning with the month in which he resumes FTA at an EI.

If the suspension was for academic reasons, the student is treated the same as one who has withdrawn from school. See [FOM-I-515.15.3](#) immediately below.

515.15.3 Deemed School Attendance

If a school does not open on schedule at the start of the term or closes before completion of a term, the student may be deemed to be in FTS during the period of non-attendance if he has not been suspended or expelled and intended to be in FTA had the school been on schedule.

515.15.4 Effect of Withdrawal

A student who intends to resume FTA at an EI, but does not do so, may be deemed to be in full time attendance THROUGH THE MONTH IN WHICH HE CHANGES HIS INTENT. However, a student cannot be entitled for more than 4 months AFTER the last month he was in FTA.

515.15.5 Terminating Event in Period of Non-Attendance

If a termination event occurs during a period of non-attendance and the requirements for deemed attendance are met, the student is entitled for only the months PRIOR to the month in which the terminating event occurred.

Example 1 A retirement O/M student's high school classes ended on May 15. He will attain age 19 on August 3 and resume full-time attendance at the same high school on September 6. He is entitled through the month of July.

Example 2 A survivor student's classes ended on May 15. He graduated on June 3. He is entitled through the month of June.

