R2T4 and Modules

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R2T4 and Modules?

“Fitting a square peg into a round hole…”
Modules Defined

• 668.22(l)(6)
  – “when a course or courses in program do not span entire length of payment period (term) or period of enrollment”

• Doesn’t matter what modules are called at the institution
  – e.g., mini-terms, J-terms, mini-mesters, mini-sessions, modules....
Modules: Changing Patterns in Education

• Short term and sequential course enrollment
  – courses are often offered in modules, usually 1-8 weeks in length
• Programs with modules may -
  – compose an entire program; or
  – be offered in conjunction with courses that span the full term
Modules: Changing Patterns in Education

• Used in Standard Term, Non-Standard Term and Non-Term Settings
• May have two or more modules within a term
• May be sequential or concurrent
• May overlap
## Different Modules in a 16-week Term

<table>
<thead>
<tr>
<th>Full term courses</th>
<th>16 weeks</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 weeks</td>
<td>4 weeks</td>
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<td>4 weeks</td>
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<td>4 weeks</td>
<td>4 weeks</td>
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</tbody>
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<table>
<thead>
<tr>
<th>8 weeks</th>
<th>8 weeks</th>
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<tbody>
<tr>
<td>5 weeks</td>
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<td>5 weeks</td>
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</tbody>
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<table>
<thead>
<tr>
<th>3 weeks</th>
<th>8 weeks</th>
<th>5 weeks</th>
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</thead>
<tbody>
<tr>
<td>3 weeks</td>
<td>3 weeks</td>
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<tr>
<td>3 weeks</td>
<td>3 weeks</td>
<td>3 weeks</td>
</tr>
</tbody>
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**Federal Student Aid**

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Withdrawal Defined

• Student does not complete all days scheduled to complete within the payment period/term (whether official or unofficial withdrawal)

• If no passing grade in last scheduled course/module, school must demonstrate student completed period
  — Earned “F” vs Unearned “F”

• Drop vs Withdrawal
  • Drop a class
  • Withdraw from school
Withdrawal Defined

- An administrative withdrawal initiated by the school is considered an official withdrawal
  - A school may drop a student from a class in a future module because the student failed a prerequisite class in a prior module
Calendar Days - Credit Hour Modules

• Total calendar days include all days in which the student was scheduled to attend
  – *Days of attendance in courses count regardless of whether module(s) were completed*
  – Exclude scheduled breaks of at least 5 consecutive days when student is not scheduled to attend a module or other course
    • Includes allowable breaks between modules (as long as not attending other courses during the break)
Impact of Enrollment Status Changes

• Adjustments to a student’s enrollment status made after a student has ceased attendance have no bearing on the R2T4 calculations
  – If a student enrolled in 3 modules, completes one, and then drops the remaining two after ceasing attendance, all days in all three modules will be included in the R2T4 calculation
  – This can apply to situations where a student drops all future modules during a break between modules
Impact of Enrollment Status Changes

• If a student drops all future courses on the same day he or she drops a current module it is considered a withdrawal and all days in all modules the student was scheduled to attend must be included in the R2T4 calculation.

• Update: If student drops future courses on LAST DAY of module completed, future courses are not factored into R2T4.

• Considered dropped while attending other courses.
Written Confirmation Of Return

• Student in a modular program not considered a withdrawal if:
  – Provides written confirmation of intent
    • Must be provided at the time of withdrawal
    • Can be paper or electronic process
    • Registration for future modules does not constitute written confirmation
  – Student may change return date in writing
    • Must provide change prior to original return date
Written Confirmation Of Return

• Nonstandard term and Non-term programs
  – Student considered to be withdrawal if not scheduled
to begin another course in period of enrollment for
more than 45 calendar days

• 45 days measured from end of module ceased
  attending
Written Confirmation Of Return

• Student considered to be withdrawal if does not return as scheduled

• Withdrawal date is retroactive to when written confirmation was originally provided
  – Determine withdrawal date and days of attendance as if written confirmation was never provided
  – The date the student was scheduled to return is the date of the school’s determination of withdrawal
Return After Withdrawal

• If returning in the same payment period, the student is treated as if did not cease attendance
  – The school must “undo” the R2T4 calculation

• Restore student’s original amounts with no adjustment for partial attendance of a module
  – Except if a student never began all of their courses
    • Adjustments may need to be made to the original Title IV award amounts, such as Pell Grant recalculation
R2T4 and Pell Grant Recalculation

• Student doesn’t begin attendance in all classes in a term
  — If a student does not begin attendance in all of his or her classes, resulting in a change in the student’s enrollment status, your school must recalculate the student’s Pell (and TEACH and IASG) award based on the lower enrollment status
  — If a school learns a student did not begin attendance in all courses and an R2T4 calculation is required, **FIRST** perform the Pell recalculation and then include the adjusted Pell amount in the R2T4 calculation
• The Pell recalculation is a separate and distinct process from the R2T4 calculation
Examples and Case Studies

R2T4 & Modules
Did the Student Withdraw?

1. Did the student cease to attend before completing, or fail to begin attending, a course scheduled to attend?
   • If yes, go to question 2
   • If no, student is not a withdrawal

2. When ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses?
   • If yes, student is not a withdrawal
   • If no, go to question 3

3. Did the student confirm attendance in a later module in the payment/enrollment period (45 day rule, if applicable)?
   • If no, student is a withdrawal
   • If not a withdrawal, Pell recalculations may apply
Summer Module Scenario (1)

• *Fall and Spring*: standard terms
  • All courses last for full 15 weeks and are not considered to be offered in modules

• *Summer*: three 5-week sessions (combined to be a standard term offered in modules)
  • Students can enroll in any one, two or all three summer sessions
  • Students in the 5-week summer sessions are considered enrolled in a program offered in modules since none of the sessions span the entire length of the 15-week term
### Summer Module Scenario (1)

<table>
<thead>
<tr>
<th>Session 1</th>
<th>Session 2</th>
<th>Session 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 weeks</td>
<td>5 weeks</td>
<td>?</td>
</tr>
<tr>
<td>33 days</td>
<td>33 days</td>
<td>33 days</td>
</tr>
</tbody>
</table>

- Student enrolls in all three summer sessions
- Completes Session 1
- Begins Session 2
- Stops attending on day 10 of Session 2
- No notification of withdrawal provided
- No confirmation of return

- Is this a withdrawn student?
**Summer Module Scenario (1)**

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<td>5 weeks</td>
<td>5 weeks</td>
</tr>
<tr>
<td>33 days</td>
<td>33 days</td>
<td>33 days</td>
</tr>
<tr>
<td>2 days</td>
<td>2 days</td>
<td>2 days</td>
</tr>
</tbody>
</table>

- Student is withdrawn
  - R2T4 calculation required, after recalculating Pell Grant
  - Withdrawal date: day 10 of session 2 (if required to take attendance);
    50% point of enrollment period or last known date of attendance (if not required to take attendance)
  - Number of days in period = 103 days
R2T4 Studies University (RSU) Scenario (2)

15-week Full Term  103 days
9/06 – 12/17

Module 1
33 days
9/06 – 10/08

Module 2
33 days
10/11 – 11/12

Module 3
33 days
11/15 – 12/17

Standard Term Semester Calendar
Term is 15 weeks, 103 days
Courses also offered in 5-week, 33-day modules
RSU Example 1

15-week Full Term (9/06 – 12/17): 103 days

- 9/06 attends 3 credits in Full Term; enrolled in Modules 2 and 3
- 9/28 drops 3 credits, Full Term
- 11/12 drops 3 more credits, Full Term
- 10/11 begins 3 credits, Module 2
- 11/12 completes 3 credits, Module 2
- 11/12 drops 3 credits, Module 3

Weeks:
- 9/06 – 10/08
- 10/11 – 11/12
- 11/15 – 12/17

Module 1: 33 days
Module 2: 33 days
Module 3: 33 days

Is this a withdrawn student?
RSU Example 1

- Not a withdrawn student
- R2T4 not required because dropped courses while still attending module 2 course (even if last day of module) and ended up completing module 2
- Pell recalculation as necessary (module 3)
RSU Example 2

15-week Full Term (9/06 – 12/17): 103 days

- 9/06 attends 6 credits in Full Term; enrolled in Modules 1 and 3
- 9/22 drops 3 credits in Full Term
- 12/17 completes 3 credits in Full Term
- 09/06 – 10/08 begins attendance in and completes 3 credits, Module 1
- 11/15 begins 3 credits, Module 3, and drops the Module 3 class on 12/07

Is this a withdrawn student?
RSU Example 2

- Not a withdrawn student
- Enrollment ends 12/17 with completed Full Term course
- No R2T4 required
RSU Example 3

15-week Full Term (9/06 – 12/17): 103 days

- 9/06 attends 6 credits in Full Term; enrolled in 3 credits in Mod 1
- 9/14 drops 6 credits in Full Term
- 9/06 begins attendance in 3 credits, Module 1
- 9/24 drops 3 credits, Module 1

Is this a withdrawn student?
RSU Example 3

- This is a withdrawn student
- Enrollment ends 9/24 with official withdrawal
- Scheduled to attend until 10/08
- R2T4 required
- Withdrawal date is 09/24, 19 days
- Enrollment period is 9/06 – 10/08, 33 days because Full Term days had already been dropped
- $\frac{19}{33} = .5757 = 57.6\%$
Is this a withdrawn student?
RSU Example 4

• This is a withdrawn student
• Enrollment ends 11/20 with official withdrawal
• Scheduled to attend until 12/17
  – Dropped full term courses while not attending any other courses therefore entire period still counted
• R2T4 required
• Withdrawal date is 11/20, (9 days in full term + 6 days in Mod 3 = 15 days attended for numerator)
• Enrollment period is 9/06 –12/17, 103 days
• 15/103 = .1456 = 14.6%
Is Zack a withdrawn student?

________________________

Is Dave a withdrawn student?
RSU Example 5: Roommates

Zack is not a withdrawn student

- No R2T4 required -- dropped Module 2 course before ceasing attendance in Module 1
- Pell recalculation required for Module 2

Dave is a withdrawn student

- R2T4 required since withdrew after ceasing attendance
- Withdrawal date is 10/11, 36 days
- Enrollment period is 9/06 – 11/12, 68 days
- Pell Recalculation required for Module 2
  – Recalc first and then R2T4
Resources & References
R2T4 References

• FSA Handbook, Volume 5
• Program Integrity Q & A website
• R2T4 website available through FAA Access to CPS Online
• Dear Colleague Letter GEN-11-14 (July, 2011)
• 34 CFR 668.22 (R2T4); Federal Register – October 29, 2010
• 34 CFR 690.80 (Pell recalculation)
• FSA Assessments
Training Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation

• All registrants for this session will receive an email with a link to an electronic evaluation that we ask you to complete

• This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for “listening” to our customers
Ask A Fed Goes Online!

FSA has implemented a new resource to assist Financial Aid Administrators obtain guidance about the FSA programs. Based on the popularity and effectiveness of the Ask A Fed desk at the annual FSA Training Conference, we have instituted a similar process using email. Please send your inquiries about Title IV regulations to AskAFed@ed.gov

The Ask A Fed email box is staffed every business day by a team of FSA Training Officers and they are ready to assist schools with their questions.
Thank you NMASFAA!
Questions?