



R2T4 and Modules

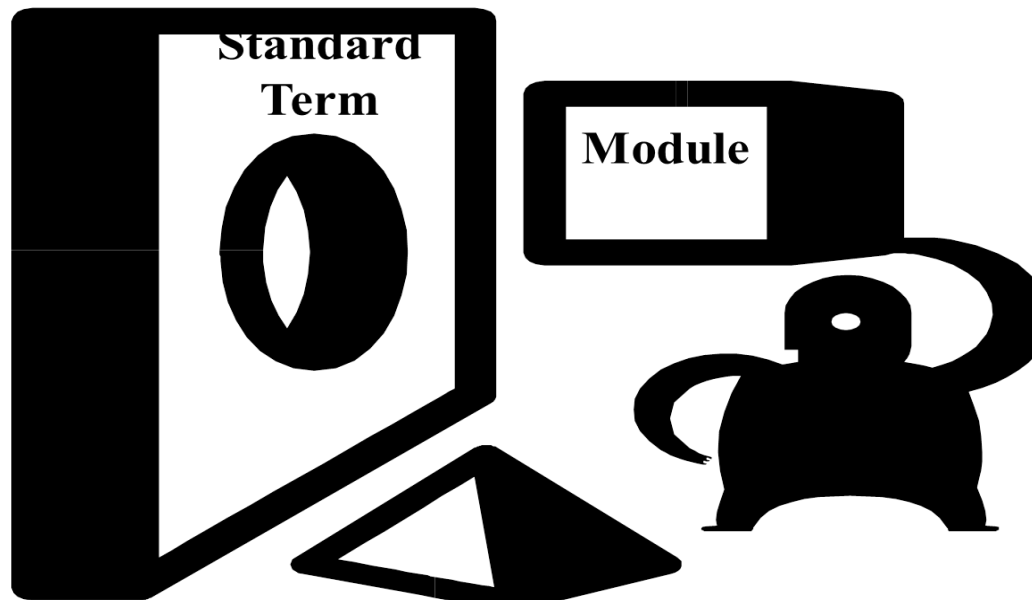
Kevin Campbell
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This presentation will be
available on
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R2T4 and Modules?

“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....

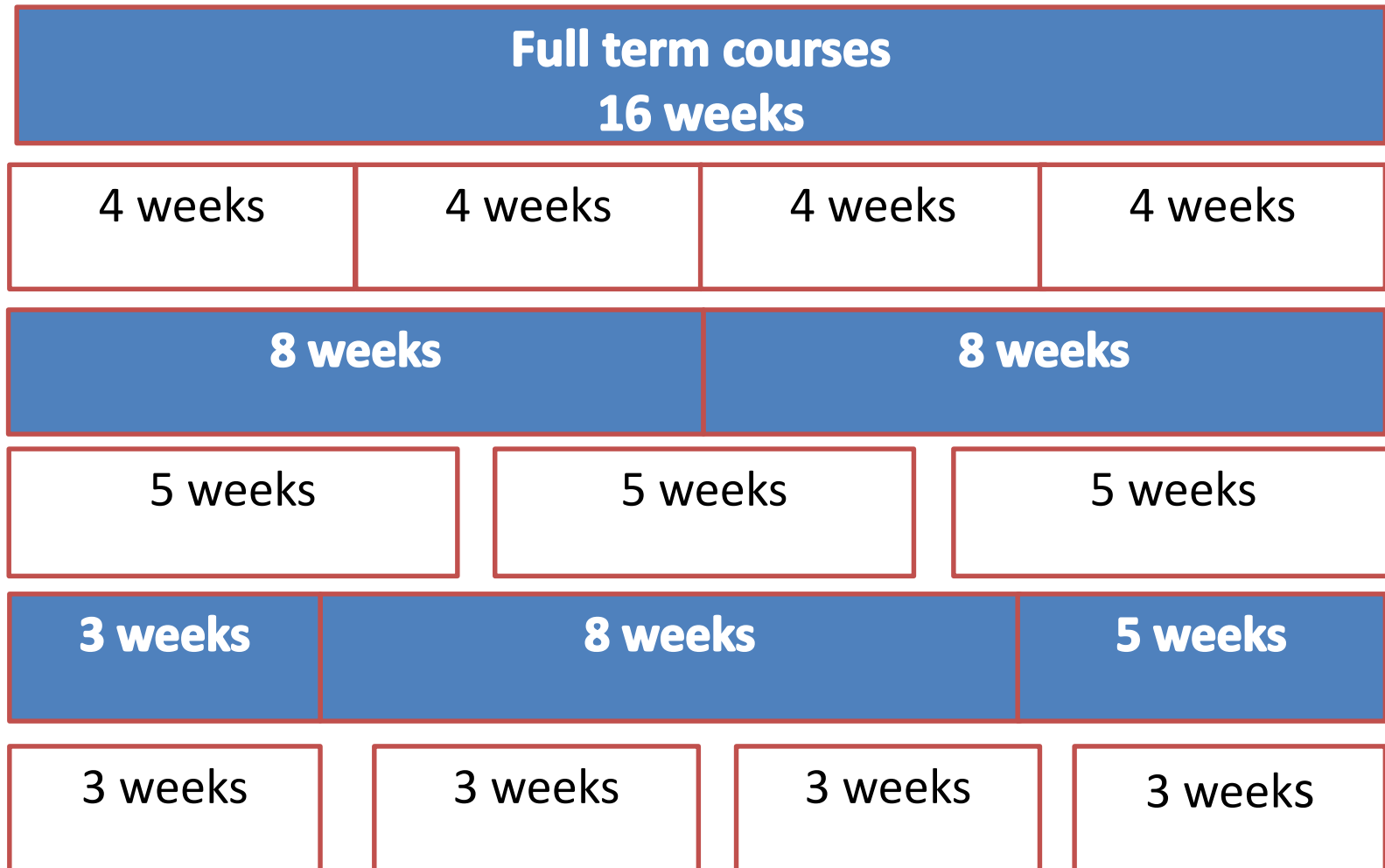
Modules: Changing Patterns in Education

- 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



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

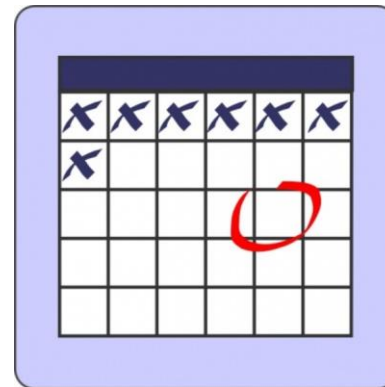
- If a student drops all future courses on the same day he or she drops a current module it is considered a withdrawal and all days in all modules the student was scheduled to attend must be included in the R2T4 calculation
- Update: If student drops future courses on LAST DAY of module completed, future 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 recalculations

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)

Session 1

Session 2

Session 3

5

Weeks

30

Days

Is this a
withdrawn
student?

- S
- C
- B
- S
- No notification of withdrawal provided
- No confirmation of return

Summer Module Scenario (1)

Session 1
5 weeks

33 days

2 days

Session 2
5 weeks

33 days

2 days

Session 3
5 weeks

33 days

- 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

2 days

Module 2
33 days

2 days

Module 3
33 days

9/06 – 10/08

10/11 – 11/12

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

Is this a
withdrawn
student?

- 9/06 atte
- 9/28 dro
- 11/12 dro

2 and 3

M

3

S

9/0

2/17

- 9/28 dro
- credits, Full term

rops 3

credits, Module 3

- 11/12 completes
3 credits, Module 2

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 attend
- 9/22 drops
- 12/17 comp

Mo
33

Is this a
withdrawn
student?

and 3

9/06

- 09/06-1
attenda
completes 3 credits,
Module 1

17

s 3

ule 3,

and drops the
Module 3 class on
12/07

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 a
- 9/14 d

ts in Mod 1

M
3

3

9/0

/17

Is this a
withdrawn
student?

- 9/06 be
in 3 cre
- 9/24 drops
3 credits, Module 1

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
- $19/33 = .5757 = 57.6\%$

RSU Example 4

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

- 9/06 a
- 9/14 d

M
3

9/0

ts in Mod 3

3

/17

written

still attend

MOD 3

- Starts Mod 3 but on 11/20 drops Mod 3 class

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
 - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-ga.html>
- R2T4 website available through FAA Access to CPS Online
 - <http://www.faaaccess.ed.gov/>
- 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
 - <http://www.ifap.ed.gov/qahome/qaassessments/returntivfunds.html>

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 NMAASFAA!



Questions?

