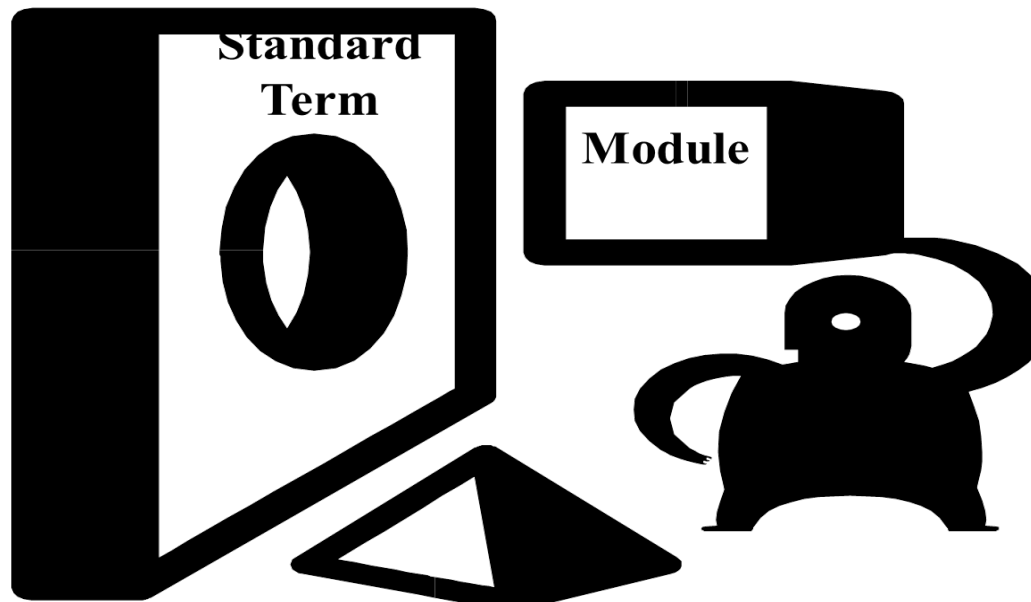


R2T4 in Modules

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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
 - For example, mini-terms, J-terms, mini-mesters, mini-sessions, modules....



Modules: Changing Patterns in Education

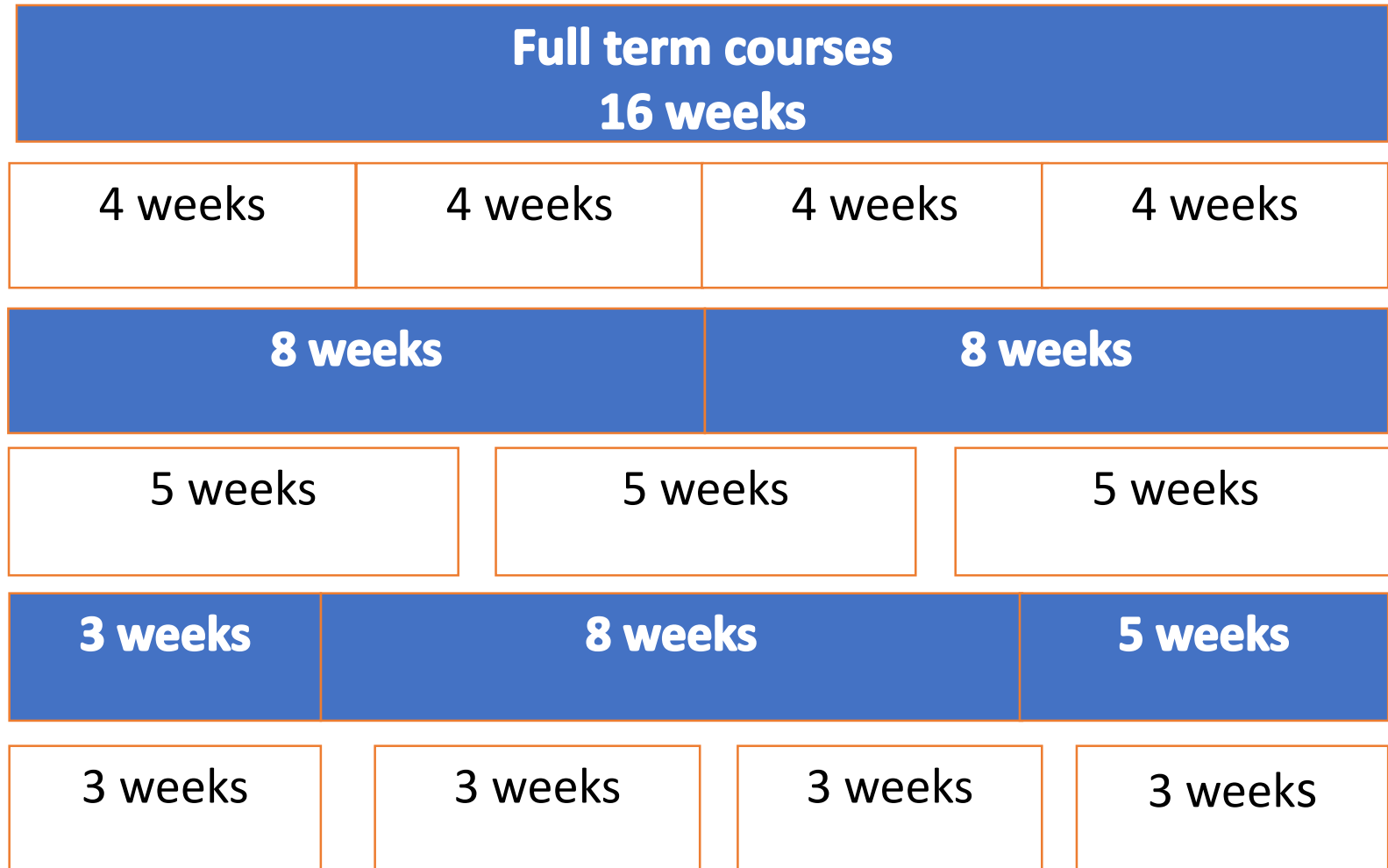
- Short term and sequential course enrollment
 - Courses are often offered in modules, usually 1-8 weeks in length
- Programs with modules may -
 - Compose an entire program; or
 - Be offered in conjunction with courses that span the full term



Modules: Changing Patterns in Education

- Used in Standard Term, Nonstandard Term and Nonterm 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 (e.g. an earned F due to failing work)

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

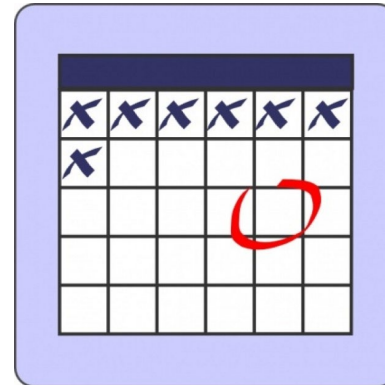
- If a student drops all future courses on the same day they withdraw from a current module it is considered a withdrawal and all days in all modules the student was scheduled to attend must be included in the R2T4 calculation
- If student drops future courses on LAST DAY of module completed, future courses in that payment period 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 to return in the same payment period
 - Must be provided at the time of withdrawal
 - Can be paper or electronic process
 - Registration for future modules in the payment period 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 Nonterm 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 he or she 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 her 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, the school must recalculate the Pell award based on the lower enrollment status
 - Campus-based awards must be recalculated based on the lower COA
 - 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

R2T4 & Modules



17

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 yes, not a withdrawal, but Pell recalculations may apply

Summer Module Example

- *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 Example

Session 1
5 weeks

33 days

2 days

Session 2
5 weeks

33 days

2 days

Session 3
5 weeks

33 days

Student enrolls in all three summer sessions. Student completes Session 1, begins Session 2, and stops attending on day 10 of Session 2. No notification of withdrawal provided, or confirmation of return.

- 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

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

- 9/06 attends 6 credits in Full Term; enrolled in 3 credits each in Modules 2 & 3
- 9/28 withdraws from 3 credits in Full Term
- 11/12 withdraws from 3 credits in Full Term

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

- 10/11 begins 3 credits, Module 2
- 11/12 completes 3 credits, Module 2
- 11/12 withdraws from 3 credits, Module 3

RSU Example 1

- 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 (Student did not begin attendance in Module 3)



RSU Example 2

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

- 9/06 attends 6 credits in Full Term; enrolled 3 credits each in Modules 1 and 3
- 9/22 withdraws from 3 credits in Full Term
- 12/17 completes 3 credits in Full Term

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

- 09/06-10/08 begins attendance in and completes 3 credits, Module 1
- 11/15 begins 3 credits, Module 3, and withdraws 12/07

RSU Example 2

- 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 withdraws 6 credits in Full Term

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

- 9/06 begins attendance in 3 credits, Module 1
- 9/24 withdraws from 3 credits, Module 1

RSU Example 3

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

RSU Example 4

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

- 9/06 attends 6 credits in Full Term; enrolled in 3 credits in Mod 3
- 9/14 withdraws 6 credits in Full Term

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

- 9/14 student provides written confirmation will still attend Mod 3
- Starts Mod 3 but on 11/20 withdraws from Mod 3

RSU Example 4

- 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
- $15/103 = .1456 = 14.6\%$

RSU Example 5: Roommates

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

- Neither student is enrolled in Full Term but each is enrolled in 3 credits each in Modules 1 and 2
- Neither student begins attendance in Module 2

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

- 9/06 begin attendance and complete 6 credits, Module 1
- 10/01 Zack withdraws from Module 2
- 10/11 Dave withdraws from Module 2

RSU Example 5: Roommates

Zack

- No R2T4 required -- dropped Module 2 course before ceasing attendance in Module 1
- Pell recalculation required for Module 2 since Zack did not begin attendance

Dave

- 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 for Module 2 is done prior to R2T4

Resources & References



R2T4 References

- FSA Handbook, Volume 5
- Program Integrity Q & A website
 - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>
- R2T4 Electronic Calculator available at COD
 - <http://www.cod.ed.gov>
 - R2T4 in COD Training <https://fsatraining.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 ready to assist schools with their questions.