R2T4 in Modules

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U.S. Department of Education

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>Module Duration</th>
<th>Full term courses (16 weeks)</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 weeks</td>
<td>4 weeks</td>
</tr>
<tr>
<td>8 weeks</td>
<td>8 weeks</td>
</tr>
<tr>
<td>5 weeks</td>
<td>5 weeks</td>
</tr>
<tr>
<td>3 weeks</td>
<td>3 weeks</td>
</tr>
</tbody>
</table>
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

Withdrawing 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.
- Update: If drop 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 campus-based aid) 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 recalcuations 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

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Summer Module Example

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

Student enrolls in all three summer sessions. Completes session 1, begins session 2, and stops attending on day 10. 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

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R2T4 Studies University (RSU) Scenario

- **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 6 credits in Full Term; enrolled in Modules 2 and 3
• 9/28 withdraws from 3 credits in Full Term
• 11/12 withdraws from 3 credits in Full Term

<table>
<thead>
<tr>
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<th>Module 3</th>
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<tbody>
<tr>
<td>33 days</td>
<td>33 days</td>
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</tr>
<tr>
<td>9/06 – 10/08</td>
<td>10/11 – 11/12</td>
<td>11/15 – 12/17</td>
</tr>
<tr>
<td>• 10/11 begins 3 credits, Module 2</td>
<td>• 11/12 withdraws from 3 credits, Module 3</td>
<td></td>
</tr>
<tr>
<td>• 11/12 completes 3 credits, Module 2</td>
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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
  – Adjusted scheduled number of days only includes days in 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 withdraws from 3 credits in Full Term
• 12/17 completes 3 credits in Full Term

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<tr>
<td>9/06 – 10/08</td>
<td>10/11 – 11/12</td>
<td>11/15 – 12/17</td>
</tr>
<tr>
<td>• 09/06-10/08 begins attendance in and completes 3 credits, Module 1</td>
<td>• 11/15 begins 3 credits, Module 3, and withdraws 12/07</td>
<td></td>
</tr>
</tbody>
</table>
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 Mod 1
- 9/14 withdraws 6 credits in Full Term

Module 1: 33 days
9/06 – 10/08

Module 2: 33 days
10/11 – 11/12

Module 3: 33 days
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 Mod 3
• 9/14 withdraws 6 credits in Full Term

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9/06 – 10/08 10/11 – 11/12 11/15 – 12/17

• 9/14 provides written confirmation to 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

• Not enrolled in Full Term; enrolled in Modules 1 and 2
• Neither student attends Module 2

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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, Module 2
• 10/11 Dave withdraws, Module 2
RSU Example 5: Roommates

Zack
• No R2T4 required – dropped Module 2 course before ceasing attendance in Module 1
• Pell recalculation required if paid for Module 2

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 if paid for Module 2

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
Thank You!

QUESTIONS?

Contact Information

Contact us with follow-up questions about this session:

- FAA policy questions: AskAFed@ed.gov
- FAA operational questions: CODSupport@ed.gov