R2T4 and Modules

R2T4 For Programs Offered in Modules

Bruce Honer | Spring 2018
U.S. Department of Education
CCCSFAAA Spring Conference

Agenda

• Module Definitions and Principles
• Withdrawals
• Dates of Determination
• Written Confirmation
• Recalculations
• Examples
• References & Resources

Module Definitions and Principles

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**Modules Defined**

- 668.22(l)(6)
  - “when a course or courses in a program do not span the entire length of the payment period 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

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**Different Modules in a 16-week Term**

<table>
<thead>
<tr>
<th>Full-term courses 16 weeks</th>
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</thead>
<tbody>
<tr>
<td>4 weeks</td>
</tr>
<tr>
<td>8 weeks</td>
</tr>
<tr>
<td>5 weeks</td>
</tr>
<tr>
<td>3 weeks</td>
</tr>
<tr>
<td>3 weeks</td>
</tr>
</tbody>
</table>

**Other Module Configurations**

<table>
<thead>
<tr>
<th>Full-term courses 16 weeks / 12 credits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 1 6 weeks 5 credits</td>
</tr>
<tr>
<td>Module 2 4 weeks 3 credits</td>
</tr>
<tr>
<td>Module 3 6 weeks 4 credits</td>
</tr>
<tr>
<td>Module 4 4 weeks 3 credits</td>
</tr>
<tr>
<td>Module 5 4 weeks 3 credits</td>
</tr>
</tbody>
</table>

In a standard-term program, modules may overlap other modules, or extend up to 2 weeks outside of the term IN TOTAL, but may not overlap other terms.

**Modules - Operating Principles**

- Schools may combine a series of modules into a single term
- Enrollment can begin at beginning of any module
- Students may skip one or more modules within a term
- Loan period includes entire term

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**Modules - Operating Principles**

- Up-front enrollment should support aid eligibility
- Cost of attendance excludes periods of non-attendance
- Student must begin attendance or is ineligible for entire payment period
- Student must begin attendance in all credits used to establish enrollment status or Pell recalculation required

**Modules - Operating Principles**

- No disbursement can be scheduled during a period of non-enrollment
- Earliest attendance dictates first disbursement: payment period begins with module that includes first date of attendance
- Change in enrollment status to less-than-half-time results in cancellation of subsequent loan disbursements

**Withdrawals**

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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)
  - School must document that the student completed all courses with a passing grade
  - If no passing grade in last scheduled course, school must demonstrate student completed period

Calendar Days - Credit Hour Modules

- Total calendar days includes all days in which student was scheduled to attend
  - Days of attendance in courses count regardless of whether module(s) was completed
  - Excludes 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 break)
  - When student who has made schedule changes withdraws, do not count attendance in courses officially dropped prior to withdrawal

Institutions Required to Take Attendance

- Outside entity requires that attendance be taken
- Institution has its own requirement that instructors take attendance
- Outside entity or institution has a requirement that can only be met by taking attendance

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Institutions Required to Take Attendance

- Must use its official attendance records to determine withdrawal date (WD)
- Last date of attendance must be the withdrawal date

Institutions Not Required to Take Attendance

- Not required to take attendance by an outside entity
- Most credit-hour institutions fit into this category

Official Withdrawals

- Official notification when following school’s withdrawal process
- Student otherwise provides official notification
- Withdrawal due to circumstances beyond student’s control
- If student dies, must use guidance under 34 CFR 668.22(c)(1)(iv)

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Unofficial Withdrawals

- Midpoint of the payment period or period of enrollment
- For all other withdrawals without notification, the withdrawal date is the midpoint of the payment period or the period of enrollment

Institutions Not Required to Take Attendance

Academically Related Activity

- School may use documented attendance at an academically related activity in lieu of any of the withdrawal dates previously mentioned
- School may use an earlier date at an academically related activity if believed to be a more accurate reflection of the withdrawal date
- School must document the activity is academic or academically related, and student’s attendance at the activity

Academically Related Activity

- Academically related activities include but are not limited to
  - Physically attending a class where there is opportunity for direct interaction between the instructor and the students
  - Submitting an academic assignment
  - Taking an exam, completing an interactive tutorial, or participating in computer-assisted instruction
  - Attending a study group that is assigned by the school
  - Participating in online discussion about academic matters
  - Initiating contact with a faculty member to ask a question about the academic subject studied in the course

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Academically Related Activity

Academically related activities do **not** include:
- Living in institutional housing
- Participating in school's meal plan
- Logging into an online class without active participation
- Participating in academic counseling or advisement

Impact of Enrollment Status Changes

Adjustments to student’s enrollment status made after student has ceased attendance have no bearing on R2T4 calculations:
- If student enrolled in three modules, completes one, and then drops remaining two **after ceasing attendance**, all days in all three modules will be included in R2T4 calculation.
- This can apply to situations where student drops all future modules during break between modules.

Impact of Enrollment Status Changes

- If student drops all future courses on **same day** they withdraw from current module it is considered a withdrawal and all days in all modules student was scheduled to attend must be included in R2T4 calculation.

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**Return After Withdrawal**

- If returning in same payment period, student is treated as if did not cease attendance
  - School must “undo” the R2T4 calculation
- Restore student’s original amounts with no adjustment for partial attendance of a module
  - Except if student never began all courses
    - Adjustments may need to be made to original Title IV award amounts, such as Pell Grant recalculations

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**Date of Determination**

- Date school becomes aware that student ceased attendance
- For student who provides notification of withdrawal to school, date of determination is later of the student’s withdrawal date or the date of notification of withdrawal (668.22(l)(3)(i))

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**Unofficial Withdraws**

**Date of Determination**

**Attendance Required**
- Cannot be more than 14 calendar days after withdrawal date

**Attendance Not Required**
- Within 30 calendar days from earlier of
  - End of payment period or period of enrollment
  - End of the academic year
  - End of student’s educational program

**Reminder about Deadlines**

30 days from date of determination to
- Perform the R2T4 calculation
- Notify the student of a grant overpayment
- Notify the student of eligibility for a post-withdrawal disbursement (PWD) of a Title IV loan and request confirmation

**Reminder about Deadlines**

45 days from the date of determination to
- Return Title IV, HEA student aid funds (ASAP, but no later than)
- Make a PWD of Title IV Grant funds (ASAP, but no later than)

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Reminder about Deadlines

• 180 days from the date of determination to
• Make a PWD of Title IV Loan funds (ASAP, but no later than)
• Must receive confirmation from student/parent before making the disbursement

Written Confirmation

Written Confirmation Of Return

• Student in modular program not considered withdrawal if
  • Provides written confirmation of intent
    • Must be provided at time of withdrawal
    • Can be paper or electronic process
    • Subsequent registration for future modules does constitute written confirmation
  • Student may change return date in writing
    • Must provide change prior to original return date

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**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

- 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
  - Date student was scheduled to return is date of school’s determination of withdrawal

**Recalculations**

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Recalculation

If student begins attendance in at least one course but does not begin attendance in all courses he or she was scheduled to attend
• Regardless of whether student is a withdrawal, school must check to see if it is necessary to recalculate student’s eligibility for Pell Grant and Campus-Based funds based on revised enrollment status and cost of attendance
• If student is a withdrawal, this recalculation must be done before performing an R2T4 calculation and school must use recalculated amounts of aid in that calculation

Recalculation

• If student who has withdrawn and began attendance in at least one course and was enrolled half-time, the school may not make a first disbursement of a Direct Loan to the student after the student withdraws

• However, funds are included as aid that could have been disbursed in the Return calculation

Recalculation

When determining Pell eligibility a school must use enrollment status established on earliest date of a withdrawal or Pell Recalculation Date (PRD)
• If student withdraws prior to arrival of the PRD, school must use the enrollment status the student established through attendance prior to the withdrawal when calculating Pell eligibility
• If student adds a course after the PRD and subsequently withdraws, school must use the enrollment status established by the student at the time of the PRD when calculating Pell eligibility

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### Examples

**R2T4 & Modules**

<table>
<thead>
<tr>
<th>Module 1</th>
<th>5 weeks</th>
<th>33 days</th>
<th>9/06 – 10/08</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 2</td>
<td>5 weeks</td>
<td>33 days</td>
<td>10/11 – 11/12</td>
</tr>
<tr>
<td>Module 3</td>
<td>5 weeks</td>
<td>33 days</td>
<td>11/15 – 12/17</td>
</tr>
</tbody>
</table>

**Standard-Term Semester Calendar**
- Term is 15 weeks, 103 days
- Courses in 5-week, 33-day modules

### Modules-Only Scenario

<table>
<thead>
<tr>
<th>Module 1</th>
<th>33 days</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 2</td>
<td>33 days</td>
</tr>
<tr>
<td>Module 3</td>
<td>33 days</td>
</tr>
</tbody>
</table>

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R2T4 and Modules

Module Example 2

Student enrolls in all three modules. On day 4 of module 1 the student drops module 2 and then stops attending on day 8. No notification of withdrawal provided, or confirmation of return.
- R2T4 calculation required, after recalculating Pell Grant
- Withdrawal date: day 8 of module 1 (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 = 66 days

Module Example 3

Student enrolls in all three modules. On day 10 of module 1 the student stops attending, but provides written confirmation that he will return for module 3.
- Recalculate Pell Grant; R2T4 Calculation is not required since written confirmation was received
- If student does not return for module 3, an R2T4 calculation must be done

Module Example 4

Student enrolls in all three modules. On day 10 of module 1 the student stops attending, but provides written confirmation that he will return for module 3. Later, student does not return to module 3.
- R2T4 calculation required, after recalculating Pell Grant
- Withdrawal date: day 10 of module 1 (if required to take attendance); day 10 of module 1 – date written confirmation was given (if not required to take attendance)
- Number of days in period = 103 days
- Date of Determination = First day of module 3

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Full-Length Courses & Modules Scenario

<table>
<thead>
<tr>
<th>Course Type</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-week Course</td>
<td>9/06</td>
<td>12/17</td>
</tr>
<tr>
<td>Module 1</td>
<td>9/06 - 10/08</td>
<td></td>
</tr>
<tr>
<td>Module 2</td>
<td>10/11 - 11/12</td>
<td></td>
</tr>
<tr>
<td>Module 3</td>
<td>11/15 - 12/17</td>
<td></td>
</tr>
</tbody>
</table>

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

Example 1

<table>
<thead>
<tr>
<th>Course Type</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-week Course</td>
<td>9/06</td>
<td>12/17</td>
</tr>
<tr>
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<td>9/06 - 10/08</td>
<td></td>
</tr>
<tr>
<td>Module 2</td>
<td>10/11 - 11/12</td>
<td></td>
</tr>
<tr>
<td>Module 3</td>
<td>11/15 - 12/17</td>
<td></td>
</tr>
</tbody>
</table>

Claire enrolls in two 15-week courses – this student is not considered to be enrolled in a program offered in modules
Doug enrolls in the first 5-week module and one 15-week course – this student is considered to be enrolled in a program offered in modules

Example 2

<table>
<thead>
<tr>
<th>Course Type</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-week Courses (9/06 – 12/17)</td>
<td>9/06</td>
<td>12/17</td>
</tr>
<tr>
<td>Module 1</td>
<td>9/06 - 10/08</td>
<td></td>
</tr>
<tr>
<td>Module 2</td>
<td>10/11 - 11/12</td>
<td></td>
</tr>
<tr>
<td>Module 3</td>
<td>11/15 - 12/17</td>
<td></td>
</tr>
</tbody>
</table>

• 9/06 - Student enrolls in 2 full-term courses and modules 2 & 3
• 9/28 - Student drops first full-term course
• 11/13 – Student completes module 2 but drops second full-term course and module 3 on the next day

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Example 2 Solution

- Enrollment ends 11/12 with completed course and official withdrawal
- Was to attend until 12/17
- Pell Recal since no attendance in module 3
- R2T4 required
- Withdrawal date is 11/13, 69 days
- Enrollment period is 9/06 – 12/17, 103 days
- 69/103 = .6699 = 67.0%

Example 3

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

<table>
<thead>
<tr>
<th>Module 1</th>
<th>Module 2</th>
<th>Module 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>33 days</td>
<td>33 days</td>
<td>33 days</td>
</tr>
<tr>
<td>9/06 – 10/08</td>
<td>10/11 – 11/12</td>
<td>11/15 – 12/17</td>
</tr>
</tbody>
</table>

- 9/06 - Student enrolls in 2 full-term courses and modules 1 & 3
- 9/22 - Student drops first full-term course
- 10/08 - Student completes module 1
- 12/07 - Student drops module 3
- 12/17 - Student completes second full-term course

Example 3 Solution

- Enrollment ends 12/17 with completed full-term course
- No R2T4 required

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Example 4

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

- **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**: Student enrolls in 2 full-term courses and module 1
- **9/14**: Student drops both full-term courses
- **9/24**: Student withdraws from module 1

Example 4 Solution

- 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
- $\frac{19}{33} = 0.5757 = 57.6\%$

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Example 4 Solution

- Enrollment ends with official withdrawal
- Scheduled to attend until 12/17 since initial earned eligibility is within full-term courses
- R2T4 required
- Withdrawal date is 10/11, 17 days + 1 day = 18 days
- Enrollment period is 9/06 – 12/17, 103 days
- 18/103 = .1747 = 17.5%

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

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Questions?

ED Contacts

Research and Customer Care Center
800.433.7327
fsa.customer.support@ed.gov

Reach FSA
855.FSA.4FAA – 1 number to reach 10 contact centers!

<table>
<thead>
<tr>
<th>Campus-Based Call Center</th>
<th>G2-Audit</th>
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<tbody>
<tr>
<td>COD</td>
<td>School Eligibility Services Group</td>
</tr>
<tr>
<td>CPS/BAIG</td>
<td>Foreign Schools Participation Division</td>
</tr>
<tr>
<td>NSLDS</td>
<td>Research and Customer Care Center</td>
</tr>
<tr>
<td>S5</td>
<td>Nelnet Total &amp; Permanent Disability</td>
</tr>
</tbody>
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Contact Information

Contact me with follow-up questions about this session:
Bruce Honer-Federal Training Officer
bruce.honer@ed.gov; 415-486-5521

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• Evaluation form is specific to Bruce Honer
• This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
• Additional feedback about training can be directed to nancy.hoover@ed.gov; 202-377-4203

Thank you!