R2T4 and Modules

Because R2T4 Wasn’t Complicated Enough, by Itself

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ED presentations will be available at www.lasfaa.org.
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>
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<tbody>
<tr>
<td>4 weeks</td>
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<th>8 weeks</th>
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<thead>
<tr>
<th>3 weeks</th>
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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
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)

• When a student who has made schedule changes withdraws, do not count attendance in courses officially dropped prior to ceasing attendance
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 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 recalcinations 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
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
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>
<th>Module 1</th>
<th>Module 2</th>
<th>Module 3</th>
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</thead>
<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>
</tbody>
</table>

- 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
  – 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

Module 1
- 33 days
- 9/06 – 10/08
  - 09/06-10/08 begins attendance in and completes 3 credits, Module 1

Module 2
- 33 days
- 10/11 – 11/12

Module 3
- 33 days
- 11/15 – 12/17
  - 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 Mod 1
- 9/14 withdraws 6 credits in Full Term

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<thead>
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</thead>
<tbody>
<tr>
<td>33 days</td>
<td>33 days</td>
<td>33 days</td>
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<tr>
<td>2 days</td>
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</tbody>
</table>

| 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
- $\frac{19}{33} = 0.5757 = 57.6\%$
RSU Example 4

<table>
<thead>
<tr>
<th>Module 1</th>
<th>33 days</th>
<th>9/06 – 10/08</th>
</tr>
</thead>
<tbody>
<tr>
<td>Module 2</td>
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</tr>
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<td>33 days</td>
<td>11/15 – 12/17</td>
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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
- 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, (8 days in full term + 6 days in Mod 3 = 14 days attended for numerator)
• Enrollment period is 9/06 –12/17, 103 days
• $\frac{14}{103} = 0.1359 = 13.6\%$
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 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
Contact Information

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Thank You LASFAA!
Questions?