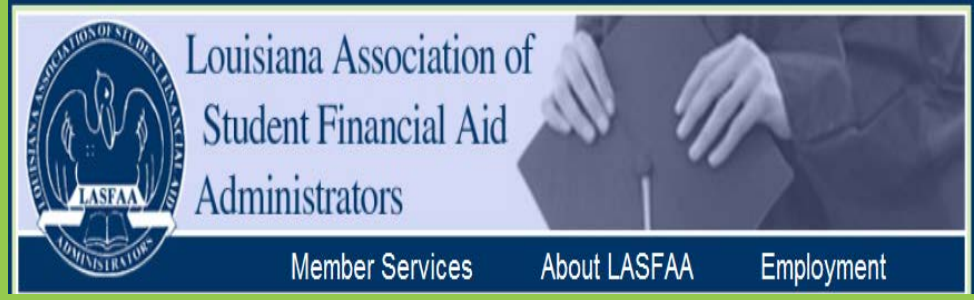


October 19, 2017

R2T4 and Modules

Because R2T4 Wasn't Complicated Enough, by Itself

Kevin Campbell
Training Officer
United States
Department of Education

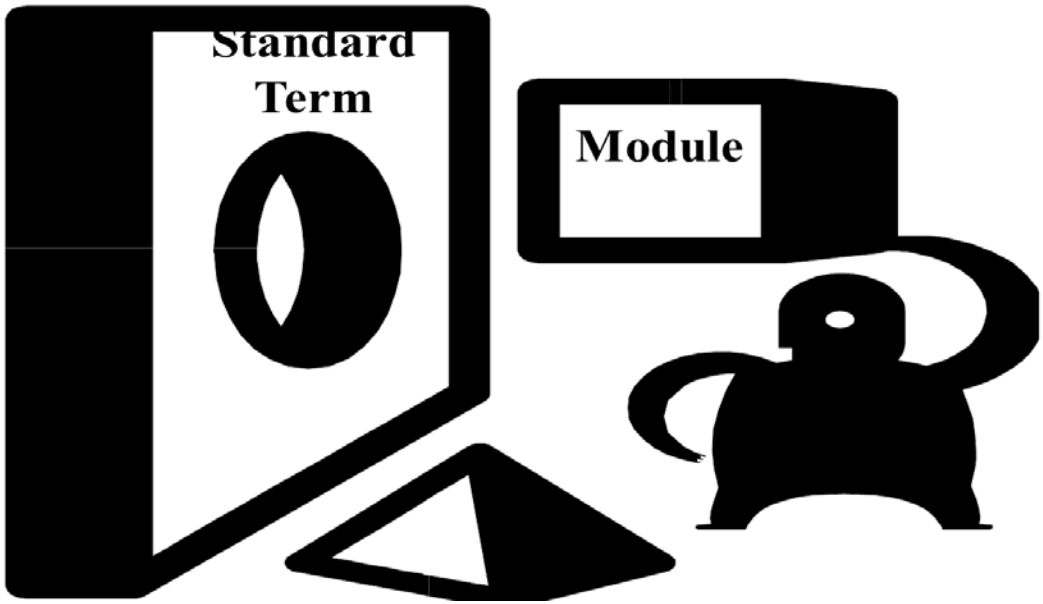
Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of the AMERICAN MIND®

ED presentations will be available at www.lasfaa.org

R2T4 and Modules?

"Fitting a square peg into a round hole…"



Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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....

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

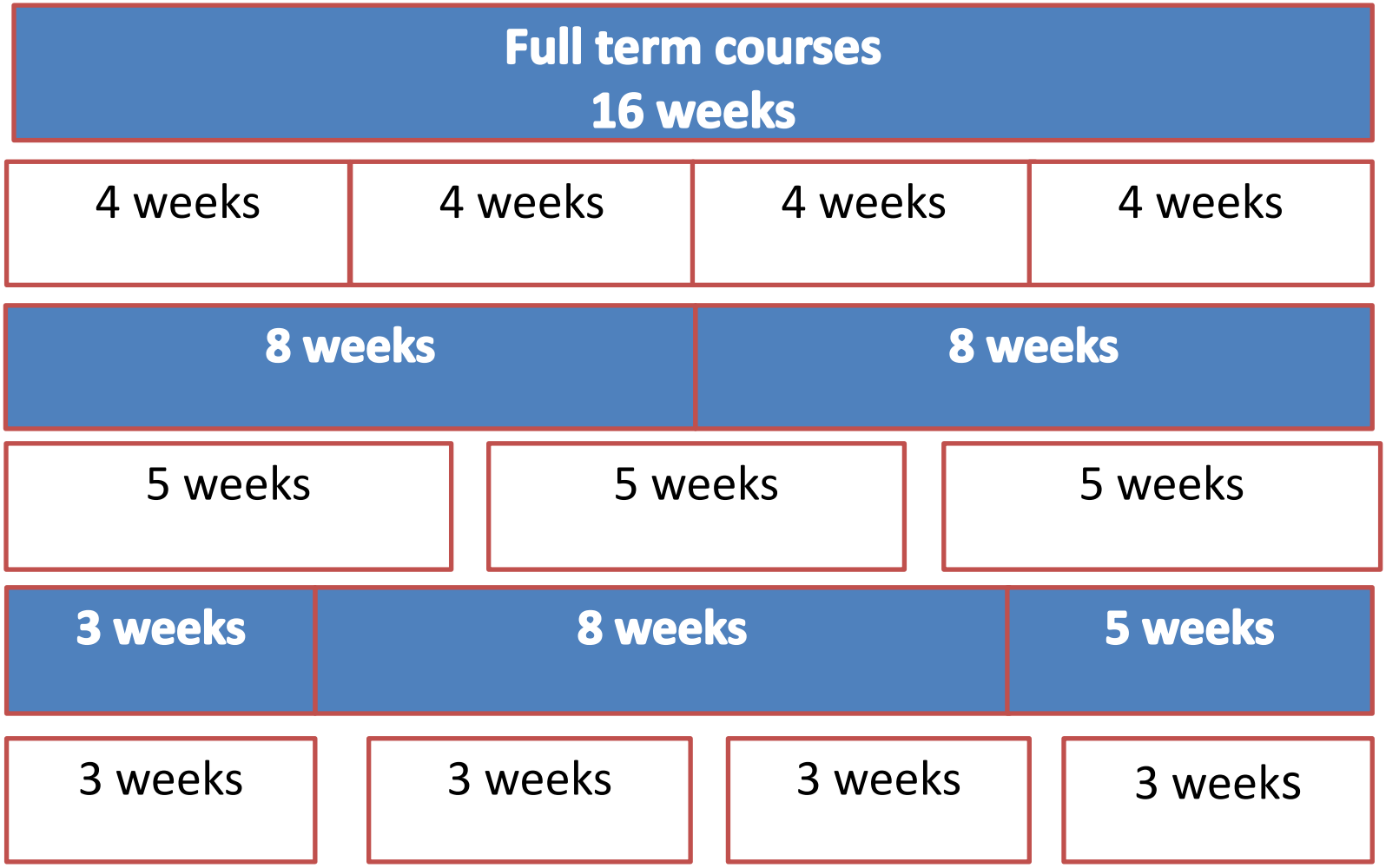
Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

Different Modules in a 16-week Term



Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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*

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

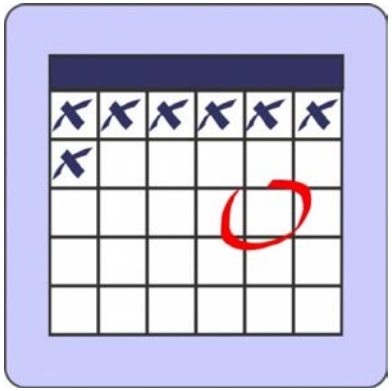
Written Confirmation Of Return

- 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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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



Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

Examples and Case Studies

R2T4 & Modules

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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 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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

Summer Module Example

Session 1 5 weeks		Session 2 5 weeks		Session 3 5 weeks
33 days	2 days	33 days	2 days	33 days

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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)

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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	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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

RSU Example 2

- Enrollment ends 12/17 with completed Full Term course
- No R2T4 required

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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	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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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%

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

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 provides written confirmation to still attend Mod 3
- Starts Mod 3 but on 11/20 withdraws from Mod 3

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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
- 14/103 = .1359 = 13.6%

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

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, Module 2
- 10/11 Dave withdraws, Module 2

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

Resources & References

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

R2T4 References

- FSA Handbook, Volume 5
- Program Integrity Q & A website
  - http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.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

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

Contact Information

Your Region VI Training Officers:

Trevor Summers
trevor.summers@ed.gov
214.661.9468

Rick Renshaw
rick.renshaw@ed.gov
214.661.9506

Kevin Campbell
kevin.campbell@ed.gov
214.661.9488

Training Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation

https://s.zoomerang.com/s/KevinCampbell-TX

Survey feedback is a tool to help us improve our training, justify training/travel expenditures and to listen to our customers.

Please provide any comments regarding this training or the trainer to:

Jo Ann Borel, Title IV Training Supervisor joann.borel@ed.gov

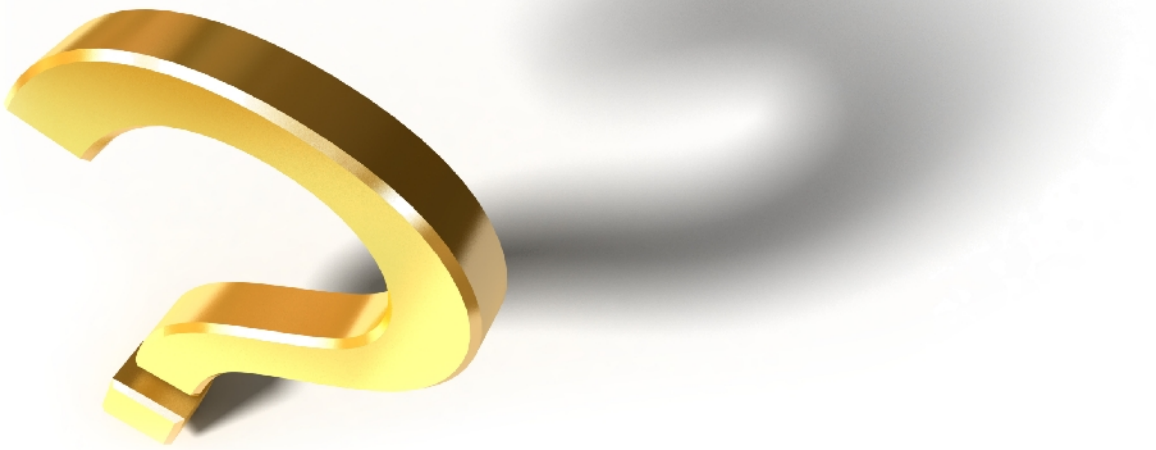
Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of the AMERICAN MIND®

Thank You LASFAA!

Questions?



Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™