

### R2T4 and Modules



## R2T4: Modules and Terms

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US Department of Education  
NHASFAA Conference, North Conway, NH  
October 23-24, 2014



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### Agenda

- What is a module?
- What constitutes a withdrawal in a program containing modules?
- Case studies and examples
- References



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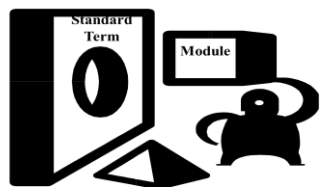
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### What is a module?

"Fitting a square peg into a round hole..."



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### R2T4 and Modules

#### Modules Defined

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

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#### 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

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#### 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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### R2T4 and Modules

## Three Academic Calendars and Program Types

- Standard Term
- Non-Standard Term
- Non-Term
  - Clock-Hour
  - Credit-Hour




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## Standard Terms

- **Semester & Trimester**
  - Generally 15-17 weeks
  - Progress measured in credit hours
  - Academic Year minimum - 24 Semester Credits/30 weeks
- **Quarters**
  - Generally 10-12 weeks
  - Progress measured in quarter hours
  - Academic Year minimum - 36 Quarter Credits/30 weeks
- **Terms are the payment period for all Title IV programs**
  - Summer may be an exception

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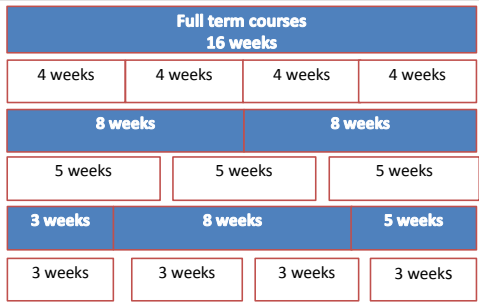
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## Different Modules in a 16-week Term




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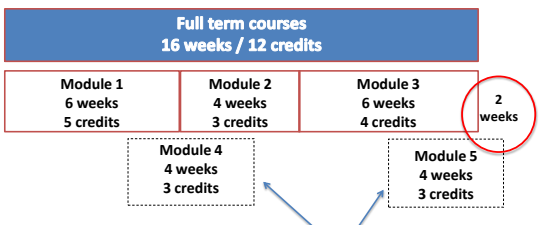
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### R2T4 and Modules

## Other Module Configurations



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.




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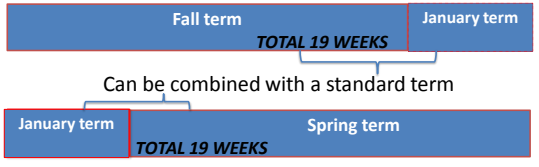
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## January Term or Winter session



Or can be a non-standard term on its own




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## Non-standard Terms

- Do not fit the definition of standard terms
- May be shorter or longer than standard terms
- May be substantially equal to each other or not be substantially equal to each other
  - Not more than two weeks' difference to be substantially equal




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### R2T4 and Modules

#### Non-standard Terms

- May look like standard terms but are non-standard due to awarding a type of credit not usually associated with that type of term
  - For example, student earns semester credits in a quarter
- For most Title IV programs, the non-standard term is the payment period
- If the non-standard terms are not substantially equal, payment periods work like non-term programs, but only for Direct Loans

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#### Non-term Programs

- Courses do not all begin and end within a discrete period of time
- Terms overlap each other
- Attendance is measured in clock hours
- Payment periods determined by student completing ½ the hours and ½ the weeks of instruction in program's Title IV academic year

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#### 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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### R2T4 and Modules

#### 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

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#### Module - 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.




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#### What is a withdrawal?




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### R2T4 and Modules

#### Withdrawal Defined

- Student does not complete all days scheduled to complete within the payment period/term
  - 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

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#### 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
- The requirement that a school must determine a student's withdrawal date does not mean the school is "required to take attendance"

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#### 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 withdrawal*

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### R2T4 and Modules

#### 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

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#### Impact of Enrollment Status Changes

- If a student drops all future courses on the *same day* they withdraw from a current module (or complete a module – last day of 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

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#### 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

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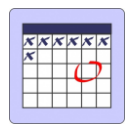
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### R2T4 and Modules

#### 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




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#### 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

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#### 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

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### R2T4 and Modules

#### R2T4 and Pell Grant Recalculation

- Student doesn't begin attendance in all classes within 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, reduce and return Pell funds first if Pell recalculation required
    - R2T4 calculation will reflect adjusted Pell amount

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#### Examples and Case Studies

#### R2T4 & Modules




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#### 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

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### R2T4 and Modules

#### 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



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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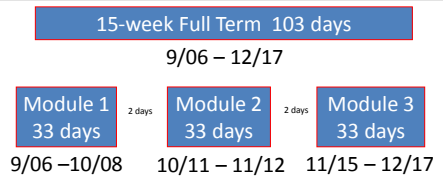
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#### R2T4 Studies University (RSU) Scenario



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

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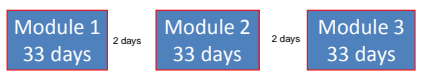
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### R2T4 and Modules

#### 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



- 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



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#### RSU Example 1

- Enrollment ends 11/12 with completed course and official withdrawal
- Was to attend until 12/17
- R2T4 required
- Withdrawal date is 11/12, 68 days
- Enrollment period is 9/06 – 12/17, 103 days
- $68/103 = .6602 = 66.0\%$



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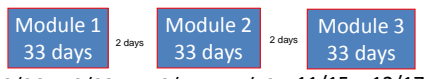
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#### RSU Example 2

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



- 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



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### R2T4 and Modules

#### RSU Example 2

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




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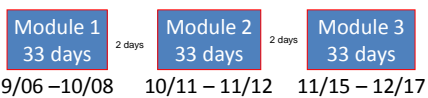
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#### RSU Example 3

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



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

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

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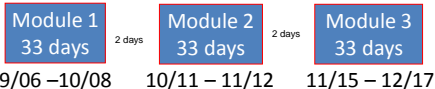
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### R2T4 and Modules

#### RSU Example 4: 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



- 9/06 begin attendance and complete Module 1
- 10/01 Zack withdraws, Module 2
- 10/11 Alex withdraws, Module 2

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#### RSU Example 4: Roommates

##### Zack

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

##### Alex

- 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

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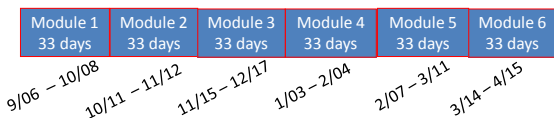
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#### Non-Term Credit-Hour Program In Modules



Academic year is 30 weeks, 206 days  
Enrollment is for full academic year

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### R2T4 and Modules

#### Non-Term Credit-Hour Program In Modules

- 9/06 begins attendance
- 11/04 withdraws Modules 2 and 3
- 11/04 confirms return in Module 4 on 1/03
- Out of school more than 45 days
- R2T4 required
- Withdrawal date is 11/04, 60 days
- Enrollment period is full academic year, 206 days
- $60/206 = .2913 = 29.1\%$

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#### Resources & References




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#### 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>

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R2T4 and Modules



Thank you!

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We Appreciate Your Feedback

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- <https://www.surveymonkey.com/s/ZacharyGoodwin>

This evaluation tool provides a means to inform us of areas for improvement, and to support an effective process for listening to our customers. Additional feedback about training can be directed to [anmarie.weisman@ed.gov](mailto:anmarie.weisman@ed.gov).

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R2T4 and Modules

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Reach FSA  
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