

R2T4 and Modules

R2T4 For Programs Offered in Modules

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

Federal Student Aid
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Agenda

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

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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....

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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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Different Modules in a 16-week Term

Full-term courses 16 weeks			
4 weeks	4 weeks	4 weeks	4 weeks
8 weeks		8 weeks	
5 weeks	5 weeks	5 weeks	
3 weeks	8 weeks		5 weeks
3 weeks	3 weeks	3 weeks	3 weeks

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Other Module Configurations

Full-term courses 16 weeks / 12 credits		
Module 1 6 weeks 5 credits	Module 2 4 weeks 3 credits	Module 3 6 weeks 4 credits
Module 4 4 weeks 3 credits		Module 5 4 weeks 3 credits

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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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

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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



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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

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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*

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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

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Institutions Not Required to Take Attendance

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



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Institutions Not Required to Take Attendance

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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Institutions Not Required to Take Attendance

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

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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

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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

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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

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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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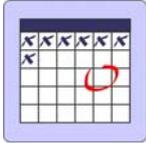
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Return After Withdrawal

- 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



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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

<p>Attendance Required</p> <ul style="list-style-type: none"> • Cannot be more than 14 calendar days after withdrawal date 	<p>Attendance Not Required</p> <ul style="list-style-type: none"> • Within 30 calendar days from earlier of <ul style="list-style-type: none"> – End of payment period or period of enrollment – End of the academic year – End of student's educational program
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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

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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

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Written Confirmation



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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

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

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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

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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

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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
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Modules

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Modules-Only Scenario

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 in 5-week, 33-day modules

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Module Example 1

Module 1 5 weeks	2 days	Module 2 5 weeks	2 days	Module 3 5 weeks
33 days		33 days		33 days

Student enrolls in all three modules. Completes module 1, begins module 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 module 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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Module Example 2

Module 1 5 weeks	Module 2 5 weeks	Module 3 5 weeks
33 days	33 days	33 days

2 days 2 days

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

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Module Example 3

Module 1 5 weeks	Module 2 5 weeks	Module 3 5 weeks
33 days	33 days	33 days

2 days 2 days

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

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Module Example 4

Module 1 5 weeks	Module 2 5 weeks	Module 3 5 weeks
33 days	33 days	33 days

2 days 2 days

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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Example 2 Solution

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

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Example 3

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

Module 1 33 days 9/06 – 10/08	2 days	Module 2 33 days 10/11 – 11/12	2 days	Module 3 33 days 11/15 – 12/17
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- 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

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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	2 days	Module 2 33 days 10/11 – 11/12	2 days	Module 3 33 days 11/15 – 12/17
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- 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

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

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Example 4

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

Module 1 33 days 9/06 – 10/08	2 days	Module 2 33 days 10/11 – 11/12	2 days	Module 3 33 days 11/15 – 12/17
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- 9/06 - Student enrolls in 2 full-term courses and module 2
- 9/22 - Student drops both full-term courses, but provides written confirmation will attend module 2
- 10/11 - Student begins attendance in module 2 and then drops the same day

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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
- $18/103 = .1747 = 17.5\%$

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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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Questions?



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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!

Campus-Based Call Center	eZ-Audit
COD	School Eligibility Services Group
CPS/SAIG	Foreign Schools Participation Division
NSLDS	Research and Customer Care Center
G5	Nelnet Total & Permanent Disability

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Contact Information

Contact me with follow-up questions about this session:
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- Go to <http://s.zoomerang.com/s/BruceHoner>
- 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

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Thank you!



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