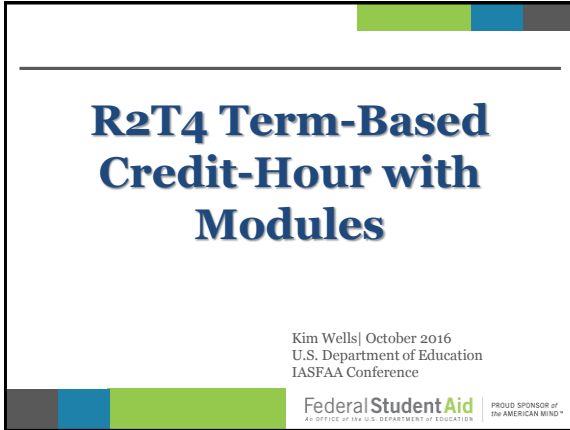


R2T4 and Modules

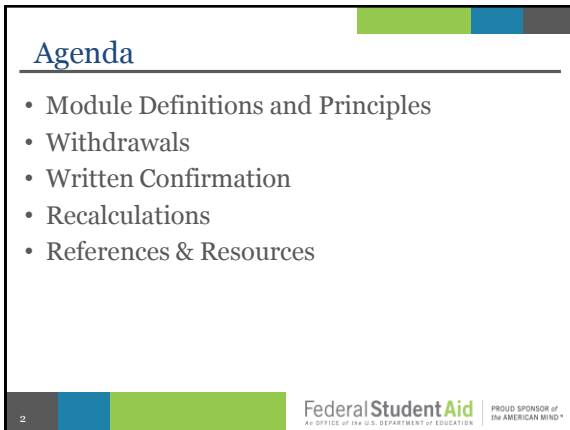


**R2T4 Term-Based
Credit-Hour with
Modules**

Kim Wells | October 2016
U.S. Department of Education
IASFAA Conference

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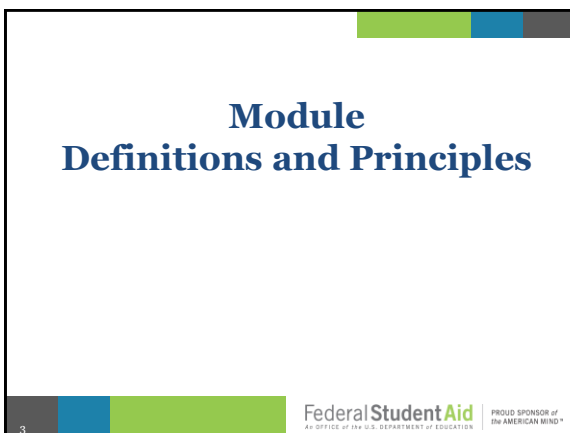
Agenda

- Module Definitions and Principles
- Withdrawals
- Written Confirmation
- Recalculations
- References & Resources

2

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**Module
Definitions and Principles**

3

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R2T4 and Modules

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....

4

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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.

6

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R2T4 and Modules

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

7

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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

8

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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

9

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R2T4 and Modules

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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R2T4 and Modules

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

13

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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" 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

14

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Written Confirmation



15

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R2T4 and Modules

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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R2T4 and Modules

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

20

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Recalculation

- If student who has withdrawn did not begin attendance in enough courses to establish a half-time enrollment status, 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

21

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R2T4 and Modules

Recalculation

When determining Pell eligibility a school must use enrollment status established on earliest date of a withdrawal or census date

- If student withdraws prior to arrival of census date, 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 census date and subsequently withdraws, school must use the enrollment status established by the student at the time of the census date when calculating Pell eligibility

22

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Examples R2T4 & Modules



23

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Full-Length Courses & Modules Scenario

15-week Course; 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

24

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R2T4 and Modules

Example 1

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
-------------------------------------	--------	--------------------------------------	--------	--------------------------------------

- 9/06 - Student enrolls in 2 full-term courses and modules 2 & 3
- 9/28 - Student drops first full-term course
- 11/12 - Student completes module 2 but drops second full-term course and module 3 on the same day

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Example 1 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 11/12, 68 days
- Enrollment period is 9/06 – 12/17, 103 days
- $68/103 = .6602 = 66.0\%$

26

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Example 2

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
-------------------------------------	--------	--------------------------------------	--------	--------------------------------------

- 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

27

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R2T4 and Modules

Example 2 Solution

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

28

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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
-------------------------------------	--------	--------------------------------------	--------	--------------------------------------

- 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

29

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Example 3 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
- $19/33 = .5757 = 57.6\%$

30

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R2T4 and Modules

**Resources
&
References**

31

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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>

32

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Questions?



33

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Contacts

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



Reach FSA
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<i>Campus Based Call Center</i>	<i>eZ-Audit</i>
<i>COD</i>	<i>School Eligibility Service Group</i>
<i>CPS/SAIG</i>	<i>Foreign Schools Participation Division</i>
<i>NSLDS</i>	<i>Research and Customer Care Center</i>
<i>G5</i>	<i>Nelnet Total & Permanent Disability Team</i>

34

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35

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36

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R2T4 and Modules



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