



R2T4 & Modules

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GASFAA 2011 Spring Conference

Parts of Term

Summer

- Sessions A, B, and C
- May, June, and July Sessions
- 1st Summer and 2nd Summer Session
- Four Week Session I and II

Fall or Spring

- 1st Session and 2nd Session
- 1st Mini Semester and 2nd Mini Semester
- 1st 10 weeks and Last 10 weeks

Program Definitions

- New rules define a program

“offered in modules”

- A course or courses in the program that do not span the entire length of the payment period or period of enrollment

Reference : 34 CFR 668.22 (1)(6)

Credit Hour Programs Offered in Modules

Standard term program “offered in modules”

- Two 8-week sessions within a 16 week semester
- Two 6-week sessions within a 12 week quarter
- Three 5-week sessions within a 15 week semester
- Winter “inter-session” or “J term” between fall and spring semesters

Reference : 34 CFR 668.22 (1)(6)

Credit Hour Programs Offered in Modules

- A student is considered to be a withdrawal if they do not complete all days scheduled to complete within the payment period/term.
- The school must document completed courses with a passing grade.
- If no passing grade in the last scheduled course, the school must demonstrate that the student completed the period/term.

Reference : 34 CFR 668.22 (a)(2)(A)

Semester Calendar Example

XYZ University has a semester term-based calendar that includes two 16-week semesters.

Within each 16-week semester,





there are courses that span the entire (full) term
and

there are 4 modules (A, B, C, and D)
of 4 weeks each, offered consecutively.

Semester Calendar Example

In the fall, Joe enrolls in modules A, B, and D.

Joe completes module A, begins module B, then withdraws from module B.

| Full Term = 16 weeks | | | |
|---|---|---|---|
| 4 weeks | 4 weeks | 4 weeks | 4 weeks |
| A  | B  | C  | D  |
| Grade in class | W for course | - | |

Note that Joe is not enrolled in a full term course.

Semester Calendar Example

| Full Term = 16 weeks | | | |
|----------------------|--------------|---------|---------|
| 4 weeks | 4 weeks | 4 weeks | 4 weeks |
| A ✓ | B ✓ | C ✗ | D ✓ |
| Grade in class | W for course | - | |

At this point, Joe is a Title IV withdrawal and an R2T4 calculation must be done!

This is VERY different from current rules that do not consider Joe to be a Title IV withdrawal because he has completed a course in the term.

Semester Calendar Example

| Full Term = 16 weeks | | | |
|----------------------|--------------|---------|---------|
| 4 weeks | 4 weeks | 4 weeks | 4 weeks |
| A ✓ | B ✓ | C ✗ | D ✓ |
| Grade in class | W for course | - | |

Joe's registration for module D is not enough to override the R2T4 requirement.

*However, the R2T4 calculation is not required if the school collects written confirmation from Joe, at the time of his withdrawal from module B, that he intends to return for Module D.

Semester Calendar Example

| Full Term = 16 weeks | | | |
|----------------------|--------------|---------|---------|
| 4 weeks | 4 weeks | 4 weeks | 4 weeks |
| A ✓ | B ✓ | C ✗ | D ✓ |
| Grade in class | W for course | - | |

If Joe then returns for Module D, and completes the module, no R2T4 is required.

If Joe does not return for Module D, then R2T4 is done using the withdrawal date from Module B.

If Joe returns for Module D and withdraws, R2T4 is done using the withdrawal date from Module D.

Semester Calendar Example*

| Full Term = 16 weeks ✓ | | | |
|------------------------|--------------|---------|---------|
| 4 weeks | 4 weeks | 4 weeks | 4 weeks |
| A ✓ | B ✓ | C ✗ | D ✓ |
| Grade in class | W for course | - | |

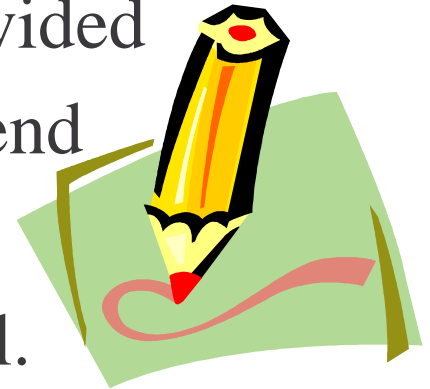
In the fall, Joe enrolls in modules A, B, D, and in a full term course.

Joe completes module A, begins module B, then withdraws from module B. If Joe completes the full term course, his withdrawal from module B would not require an R2T4 calculation.

By completing the 16 week course, he has completed all days for which he enrolled.

Credit Hour Programs Offered in Modules

- A student in a modular program is not considered a withdrawal if they provided written confirmation of intent to attend a future module in the period of enrollment at the time of withdrawal.



- A student may change their return date in writing, as long as it is prior to the original return date.

Reference : 34 CFR 668.22 (a)(2)

Credit Hour Programs Offered in Modules

Nonstandard & Nonterm programs

- A student is considered to be a withdrawal if they are not scheduled to begin another course in a period of enrollment for more than 45 calendar days from the end of the module they ceased attending.

Reference : 34 CFR 668.22 (a)(2)(i)(C)

Nonterm Program Example

ABC Institute has a nonterm program that is 60 weeks in length.

Within each 60 week program,

there are 12 courses of 5 weeks each,
or 25 days, offered consecutively.

Nonterm Program Example 1

Joe enrolls in the 60 week program of study, which is viewed as the period of enrollment.

He begins and completes two courses, 10 weeks (or 50 days), before ceasing attendance.

| | | | |
|-----|-----|-----|-----|
| 1 ✓ | 2 ✓ | 3 ✗ | 4 ✓ |
| 5 | 6 | 7 | 8 |
| 9 | 10 | 11 | 12 |

If Joe provides written notification of his intent to return for module 4, R2T4 is not required since module 4 begins 25 days after the end of module 2. (It is within 45 days.)

Nonterm Program Example 2

Joe enrolls in the 60 week program of study, which is viewed as the period of enrollment.

He begins and completes two courses, 10 weeks (or 50 days), before ceasing attendance.

| | | | |
|-----|-----|-----|-----|
| 1 ✓ | 2 ✓ | 3 ✗ | 4 ✗ |
| 5 ✓ | 6 | 7 | 8 |
| 9 | 10 | 11 | 12 |

If Joe provides written notification of his intent to return for module 5, R2T4 is required since module 5 begins 50 days after the end of module 2. (It is not within 45 days.)

Clock Hour Programs

- A student is considered to be a withdrawal if they do not complete all clock hours and weeks of instructional time that they were scheduled to complete.
- The school must document completion of all courses with a passing grade.
- If there is no passing grade in the last scheduled course, the school must demonstrate that the student completed the period.

Reference : 34 CFR 668.22 (a)(2)(B)

Is the Student a Withdrawal?

1. Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?
 - If yes, go to question 2.
 - If no, student is not a withdrawal.

Reference: 10/29/11 Federal Register, pgs. 66895-66896

Is the Student a Withdrawal?

2. Was the student attending other courses when they ceased to attend or failed to begin attendance in a scheduled course?
 - If yes, student is not a withdrawal.
 - If no, go to question 3.

Reference: 10/29/11 Federal Register, pgs. 66895-66896

Is the Student a Withdrawal?

3. Did the student confirm attendance in a later module in the payment or enrollment period (45 day rule, if applicable)?
 - If no, student is a withdrawal → calculate R2T4.
 - If not a withdrawal, Pell recalculations may apply.

Reference: 10/29/11 Federal Register, pgs. 66895-66896

Is the Student a Withdrawal?

1. Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?
 - If yes, go to question 2.
 - If no, student is not a withdrawal.
2. Was the student attending other courses when they ceased to attend or failed to begin attendance in a scheduled course?
 - 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 or enrollment period (45 day rule, if applicable)?
 - If no, student is a withdrawal → calculate R2T4.
 - If not a withdrawal, Pell recalculations may apply.

Reference: 10/29/11 Federal Register, pgs. 66895-66896

A Withdrawal? Example 1

AAA University has three 5-week modules within a semester. Joe is scheduled to complete two courses in each of the first two modules, with no enrollment in the third module.

He begins attendance in both courses in the module A, but stops attending both after only a few days. No written confirmation of intent to attend module B is received.



| Module A | Module B | Module C |
|----------|----------|-----------------------|
| Course 1 | Course 3 | <i>Did not enroll</i> |
| Course 2 | Course4 | <i>Did not enroll</i> |

Ex 1: Is the Student a Withdrawal?

1. Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?
 - If yes, go to question 2. ✓
 - If no, student is not a withdrawal.
2. Was the student attending other courses when they ceased to attend or failed to begin attendance in a scheduled course?
 - 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 or enrollment period (45 day rule, if applicable)?
 - If no, student is a withdrawal ✓ ➡ **calculate R2T4.**
 - If not a withdrawal, Pell recalculations may apply.

A Withdrawal? Example 2

AAA University has three 5-week modules within a semester. Joe is scheduled to complete two courses in each of the first two modules, with no enrollment in the third module.

He begins attendance in both courses in the module A, but stops attending only one of the two courses in module A.



| Module A | Module B | Module C |
|----------|----------|-----------------------|
| Course 1 | Course 3 | <i>Did not enroll</i> |
| Course 2 | Course 4 | <i>Did not enroll</i> |

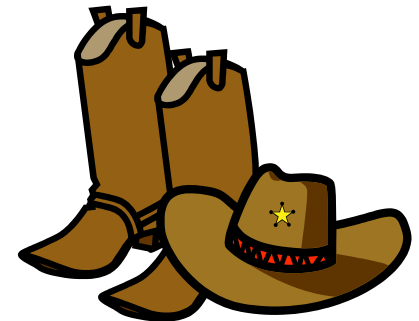
Ex 2: Is the Student a Withdrawal?

1. Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?
 - If yes, go to question 2. ✓
 - If no, student is not a withdrawal.
2. Was the student attending other courses when they ceased to attend or failed to begin attendance in a scheduled course?
 - If yes, ✓ **student is not a withdrawal.**
No R2T4 is required.

A Withdrawal? Example 3


AAA University has three 5-week modules within a semester. Joe is scheduled to complete two courses in each of the first two modules, with no enrollment in the third module.

During module A, he withdraws from both courses in module B. Joe passes both courses in module A.



| Module A | Module B | Module C |
|----------|---------------------|-----------------------|
| Course 1 | Course 3 | <i>Did not enroll</i> |
| Course 2 | Course 4 | <i>Did not enroll</i> |

Ex 3: Is the Student a Withdrawal?

1. Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?
 - If yes, go to question 2.
 - If no,  **student is not a withdrawal.**
No R2T4 is required.
- ❖ **However**, recalculation of Joe's Pell award is required because he was paid for two courses that he never attended.

Return After Withdrawal

- Modular term-based credit hour program
 - A withdrawn student may return to the same program prior to the end of the payment/enrollment period.
 - That student will be eligible for any Title IV funds for which they were eligible prior to withdrawal, i.e. you must reverse R2T4.

Reference : 34 CFR 668.22 (a)(2)(iii)(A)

Return After Withdrawal

- Clock hour/nonterm credit hour program
 - A withdrawn student may return to the same program within 180 calendar days. That student will be eligible for any Title IV funds for which they were eligible prior to withdrawal, i.e. you must reverse R2T4.

Reference : 34 CFR 668.22 (a)(2)(iii)(B)

R2T4 Calendar Days Modular Programs

- Total calendar days include all days on which the student was scheduled to attend:
 - Days of completed courses count if course does not span the length of term
 - Exclude scheduled breaks of at least 5 consecutive days when student is not scheduled to attend a module or other course offered during that period

Reference : 34 CFR 668.22 (f)(2)(i)

R2T4 Calendar Days Modular Programs

- For a withdrawn student who has made schedule changes, do not count days of courses officially dropped prior to complete cessation of attendance.

Reference : 34 CFR 668.22 (f)(2)(i)

After Written Confirmation of Return

- A student is considered to be a withdrawal if they do not return as scheduled.
- The withdrawal then dates back to the time that the confirmation was originally provided.
- Determine the withdrawal date and days of attendance as if confirmation of future attendance was never provided.

Reference : 34 CFR 668.22 (a)(2)(ii)(C)

Effective Date of new R2T4 Regulations

Electronic Announcement Posted May 6, 2011

- Question: How does the 07.01.11 effective date apply to the changes in R2T4 regulations?
- Answer: The changes apply to students who withdraw from payment periods or periods of enrollment that begin on or after 07.01.11.

The changes **DO NOT** apply to students who withdraw from a 2011 crossover payment period, even if they received funds from the 2011-2012 award year.