

# R2T4 - Programs of Study Taught in Modules

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# Agenda

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- Program Integrity Changes
- Definitions
- Institutions Required to Take Attendance
- Recalculation
- Number of Days in the Payment Period or Period of Enrollment
- Reminder About Deadlines
- Examples
- Additional Resources
- Contact Information

# 34 CFR 668.22

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- When a recipient ceases attendance before the scheduled end of the program for which s/he received Title IV, HEA aid
  - The institution is required to determine the amount of aid that the student earned
  - The institution also determines the unearned portion

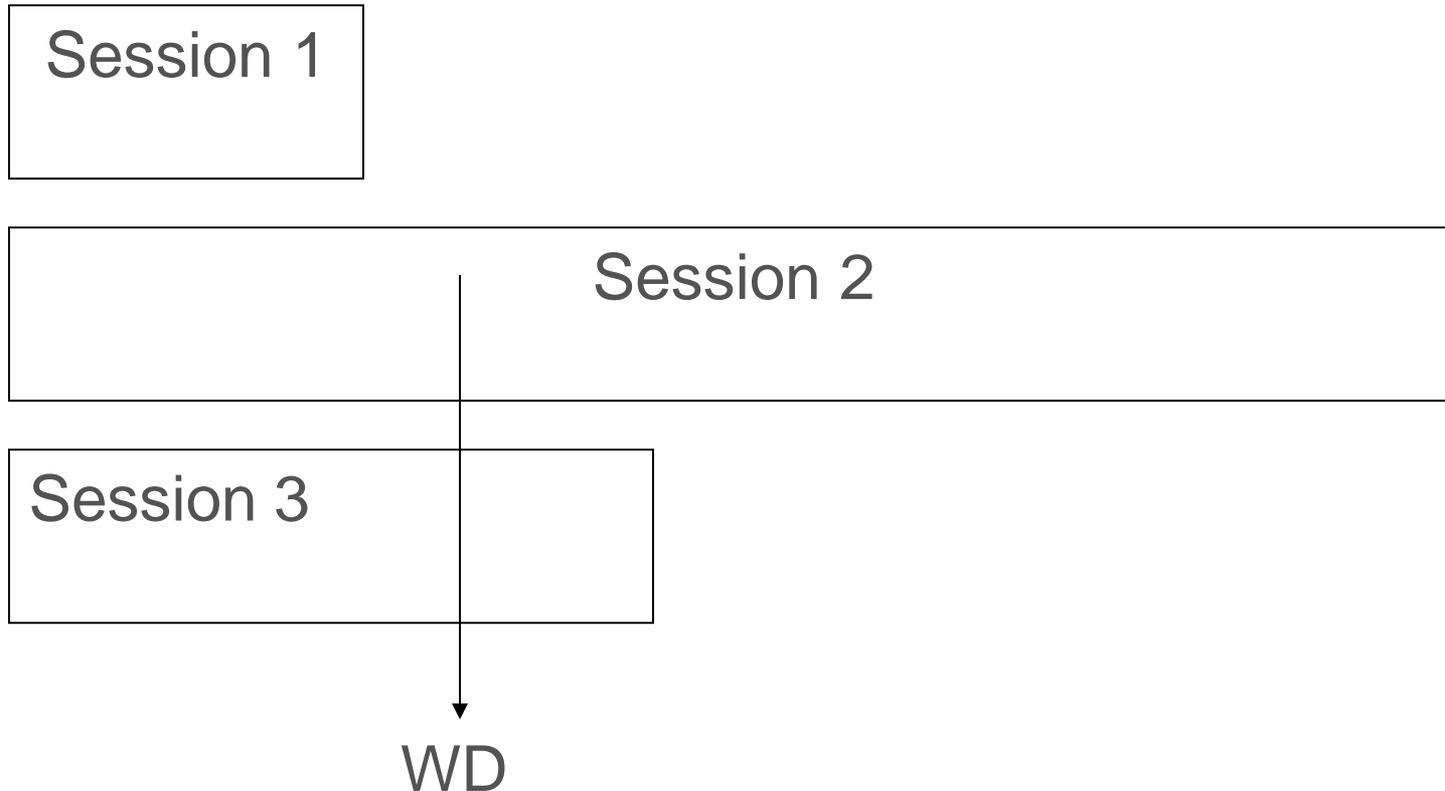
# Rules prior to 7/1/11

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- R2T4 prior to 7/1/11 did not specifically deal with term-based programs with courses that are less than the length of the term
- GEN-00-24 – (Dec. 2000) – We said that when a student is in a modular program within a standard term and the student completes at least one of the modules, then R2T4 does not apply
- Completing one compressed course (that would normally span the entire PP) is the equivalent of completing a single course that spans the entire PP or POE

# GEN - 00-24 (Dec. 2000)

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Withdrawal after completing Session 1 and two weeks into Sessions 2 and 3

# Program Integrity Changes

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- Final Regulations (75 FR 66832) - 10/29/10
- Return of Title IV Funds topics:
  - R2T4 Definitions
    - Programs “offered in modules”
    - Withdrawal
    - Written Confirmation
    - Institution Required to Take Attendance
    - Academically-related Activities
  - Number of Days in the Payment Period or Period of Enrollment
  - What happens when a student doesn’t return

# General Definitions

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- Standard Term Programs
  - Semesters, trimesters – generally 14 – 17 weeks long
  - Quarters – generally 10 – 12 weeks long
- Nonstandard Term Programs – where all coursework is expected to begin and end within a set period of time that is not a semester, trimester, or quarter terms
- Nonterm Programs – all clock-hour programs and credit-hour programs that do not begin and end within a set time (self-paced), where courses overlap, where sequential courses do not begin and end within a term

# General Definitions

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- Week of instructional time
  - Any seven consecutive day period with at least one day in which scheduled instruction or examination occurs
  - Does not include homework time, vacation time, orientation, or counseling

# R2T4 Definitions: “Offered in Modules”

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- A program is “offered in modules” if a course or courses do not span the entire length of the payment period (PP) or period of enrollment (POE)
- If the student ceases attendance before the period for which aid was awarded, it is a withdrawal
- The denominator of the Return calculation includes the full # of days used to determine the aid award, absent any institutionally scheduled breaks of 5 or more consecutive days or periods of time that the student was on an approved LOA

# Q & A

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- Q: If some portions of a program are offered in modules, but some are not, is the entire program considered to be offered in modules for Return of Title IV Funds purposes?
- A: Not necessarily. The determination of whether a program is offered in modules is made on a payment period-by-payment period or period of enrollment-by-period of enrollment basis, as appropriate, and is student specific.

# Program Offered in Modules: Example

**Module 1**

**Module 2**

**Module 3**

Student enrolls for 3 modules within a term each 35 days in length and with a weekend in between modules 1 & 2 and 2 & 3.

Cheryl begins and completes Module 1 and doesn't return for Modules 2 & 3 and doesn't contact the institution.

Institution Req'd to Take Attendance – WD = LDA (e.g. last day she took a final exam). The denominator = 109 days (35 x 3, plus 4 days between Modules).

Institution NOT Req'd to Take Attendance – WD = One of six options described in 34 CFR 668.22(c)(1)(i) – (vi). The denominator = 109 days (35 x 3, plus 4 days between Modules).

# Program Offered in Modules: Example

**Module 1**

**Module 2**

**Module 3**

Student enrolls for 3 modules within a standard term each 35 days in length and with a week in between modules 1 & 2 and 2 & 3.

Anthony begins and completes Module 1 and doesn't return for Modules 2 & 3 and doesn't contact the institution.

Institution req'd to take attendance – WD = LDA (e.g. last day he took a final exam). The denominator = 105 days (35 x 3). The time between the Modules are more than 5 consecutive days and therefore excluded .

Institution NOT req'd to take attendance – WD = one of the options in 34 CFR 668.22(c)(1)(i) – (vi). The denominator = 105 days (35 x 3).

# R2T4 Definitions: “Withdrawal”

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- A student is considered to have withdrawn if:
  - A) in a program that is measured in credit-hours, the student does not complete all the days in the PP or POE
  - B) in a program that is measured in clock-hours, the student does not complete all the clock-hours and weeks of instructional time in the PP or POE

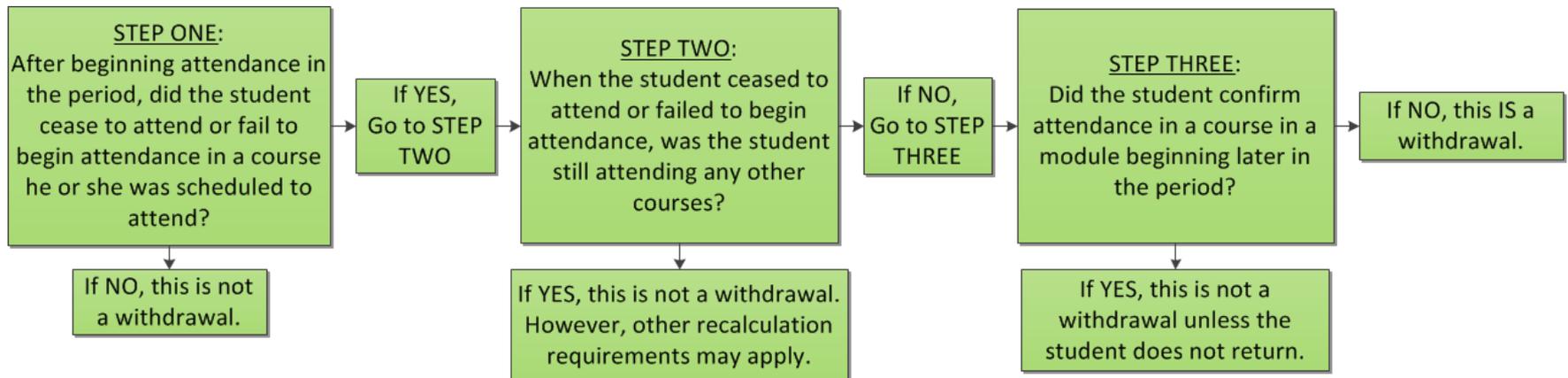
# R2T4 Definitions: “Withdrawal”

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- C) In a nonterm or nonstandard term program, the student is not scheduled to begin another course within the PP or POE for more than 45 calendar days after the end of the module the student ceased attending
  - Unless the student is on an approved LOA.

# Q & A

- Q: How do I know when a student has withdrawn in a program offered using modules?
- A: Follow the following flowchart:



# R2T4 Definitions: “Written Confirmation”

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- For courses offered in modules, a student is NOT considered to have withdrawn if:
  - For standard term programs, the institution obtains written confirmation that the student will return to complete a later module within the same PP or POE
  - For nonterm and nonstandard terms – the institution obtains written confirmation that module begins no later than 45 calendar days after the end of the module the student ceased attendance

# R2T4 Definitions: “Written Confirmation”

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- Student can revise the date of return to a later module, if:
  - Student does so in writing, between the time of the withdrawal, but prior to the return date
  - For nonterm and nonstandard term programs, the module cannot begin later than 45 calendar days after the end of the module the student ceased attendance

# Q & A

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- Q: Does an online confirmation of future attendance from the student constitute written confirmation from the student that he or she will attend a module that begins later in the same payment period or period of enrollment?
- A: Yes, provided that the confirmation is a timely positive confirmation of future attendance.

# Institutions Required to Take Attendance

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- An outside entity (an accreditor, the State) has a requirement that the institution take attendance
  - If the outside entity has a requirement for attendance taking for a sub-group of students, then that sub-group are bound by the “institution required to take attendance” rules in 668.22(b)
  - If the outside entity has a requirement that attendance taking must occur for a limited time, the institution is considered attendance-taking for **that limited time** period

# Institutions Required to Take Attendance

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- The institution itself has a requirement that attendance be taken
  - The regulations do NOT require institutions to take attendance
  - If an institution requires its faculty to take attendance at the program, departmental, or institutional level then the institution is required to take attendance for that program, department, or institution
  - NOTE: If there is no institutional requirement, but an individual faculty member chooses to take attendance, those records could, but would not be required to be used (therefore, the institution is not required to take attendance)

# Institutions Required to Take Attendance

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- Institution or an outside entity has a requirement that can only be met by taking attendance for the program or a portion of the program
- The substance of the information that must be retained is more important than how that information is described or portrayed by the school or outside entity.
- For example, if a state does not require an institution to take attendance, but requires that students in a program demonstrate attendance in all the classes of that program, the institution would be considered required to take attendance for all the students in that program

# Institutions Required to Take Attendance

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- If the institution is required to take attendance or requires attendance for only some students, attendance records must be used to determine the withdrawal date for that cohort of students

# Institutions Required to Take Attendance

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- If the institution is required to take attendance or requires attendance for a limited period of time, attendance records must be used to determine the withdrawal date for that limited period of time
- A student who attends on the last day of such a limited period is treated as a student for whom the institution was not required to take attendance, as long as the institution can demonstrate that the student attended after the limited period (such as through a test or submitting a project for a grade after the limited period)

# Institutions Required to Take Attendance

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- If instructors are only required to take attendance for a single day:
  - Considered a “census” snap-shot
  - Not considered an institution required to take attendance
  - Follow the rules for an institution NOT required to take attendance in 668.22(c)

# Required to Take Attendance: Example



2 wks

Program A – Daily attendance taking is required for the 1st 2- week period

All students who withdraw during the 1st 2 weeks = institution required to take attendance

All students who withdraw after the 2-week period = institution not required to take attendance

# Q & A

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- Q: If an institution monitors whether its online students log into classes, is this an institution “required to take attendance”?
- A: No, monitoring by itself does not meet the definition, however, if there is tracking of academic engagement, then the institution is considered to be an institution that is required to take attendance”.

# Academically-related activities

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- Examples of an academically-related activity:
  - Physically attending a class with direct interaction between the instructor and students
  - Submitting an academic assignment
  - Taking an exam, an interactive tutorial, or computer-assisted instruction

# Academically-related activities

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- Examples of an academically-related activity (continued):
  - Attending a study group that is assigned by the institution
  - Participating in an online discussion about academic matters
  - Initiating contact with a faculty member to ask a question about the academic subject studied in the course

# Academically-related activities

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- Effective 7/1/11 – you may no longer consider the following an academically-related activity for R2T4 purposes:
  - Living in institutional housing
  - Participating in the institution's meal plan
  - Logging into an online class without active participation
  - Participating in academic counseling or advisement

# Academically-related activities

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- PLEASE REMEMBER!
  - These academically-related activities must be documented and retained by the institution in accordance with the recordkeeping requirements in 34 CFR 668.24
  - Student self-documentation of an academically-related activity will not meet the requirement

# Recalculation

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- If a student begins attendance in at least one course but does not begin attendance in all the courses he or she was scheduled to attend:
  - Regardless of whether the student is a withdrawal, the school must check to see if it is necessary to recalculate the student's eligibility for Pell Grant and Campus-Based funds based on a revised enrollment status and cost of education.
  - If the student is a withdrawal, this recalculation must be done before performing a Return of Title IV Funds calculation, and the school must use the recalculated amounts of aid in the Return calculation.

# Recalculation

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- If a 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, the funds are included as aid that could have been disbursed in the Return calculation.

# Q & A

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- Q: If a student (or an institution) drops classes on the same day that the student withdraws, is the student's enrollment status adjusted to reflect the dropped classes for Return of Title IV Funds purposes?
- A: No. Classes dropped on the same day that the student withdraws have no bearing on the Return of Title IV Funds requirements. The institution must perform a Return of Title IV Funds calculation that includes those classes in the days in all modules the student was scheduled to attend **and upon which aid was awarded.**

# Number of Days in the PP or POE

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- Includes all the calendar days within the period that the student was scheduled to complete, except:
  - The number of institutionally scheduled breaks of 5 consecutive days or more are not included in the total calendar days used in the Return calculation, or
  - The days in which the student was on an approved LOA (that complies with 668.22(d)).

# Number of Days in the PP or POE

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- For credit-hour nonterm programs, Dear Colleague Letter GEN-04-03 (February 2004) also provides that if the student has failed any courses in the payment period prior to withdrawing, the payment period in the R2T4 calculation must be extended to reflect the number of days in the failed courses that the student did not successfully complete

# Reminder about Deadlines

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- 30 days from the 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
- 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 directly to a student (ASAP, but no later than)
- 180 days from the date of determination to:
  - Make a PWD of Title IV loan funds (ASAP, but no later than)
  - Make a PWD of Title IV grant funds to a student's account for outstanding charges

# Modules - Example: A

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- Institution A:
  - Fall and Spring = standard terms
    - Never considered to be “offered in modules”
  - Summer = three 5-week sessions (combined to be a standard term)
    - Students can enroll in any of the Summer Sessions or all of them
    - Students enrolled in the 5-week Sessions are considered in programs “offered in modules” since none of the Sessions span the entire length of the term

# Modules - Example: A.1

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- Student #1 – Enrolls in all three Summer Sessions
  - Ceases enrollment on Day 5 in the 1<sup>st</sup> 5-week Session

|                                   |                                   |                                   |
|-----------------------------------|-----------------------------------|-----------------------------------|
| Session 1<br>5 weeks (35<br>days) | Session 2<br>5 weeks (35<br>days) | Session 3<br>5 weeks (35<br>days) |
|-----------------------------------|-----------------------------------|-----------------------------------|

Drops all  
sessions: Day 5

# Modules - Example: A.1

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## THE RESULTS:

- Step 1 – Recalculate Pell & Campus-based
- Step 2 – Determine earned & unearned amounts of Title IV aid (TIV)
  - Numerator = number of days attended in Course 1 (assume no breaks) of 5 or more days (Day 5)
  - Denominator = Start date of Course 1 thru end date of Course 3 (less any scheduled break of 5 or more consecutive days or approved LOAs) 105 days or .048 or 4.8%

# Modules - Example: A.1

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|                                |                                |                                |
|--------------------------------|--------------------------------|--------------------------------|
| Session 1<br>5 weeks (35 days) | Session 2<br>5 weeks (35 days) | Session 3<br>5 weeks (35 days) |
|--------------------------------|--------------------------------|--------------------------------|

Withdrawal on Day 5 - student also drops remaining Sessions.

At an institution required to take attendance:  $WD = \text{Day 5}$ .

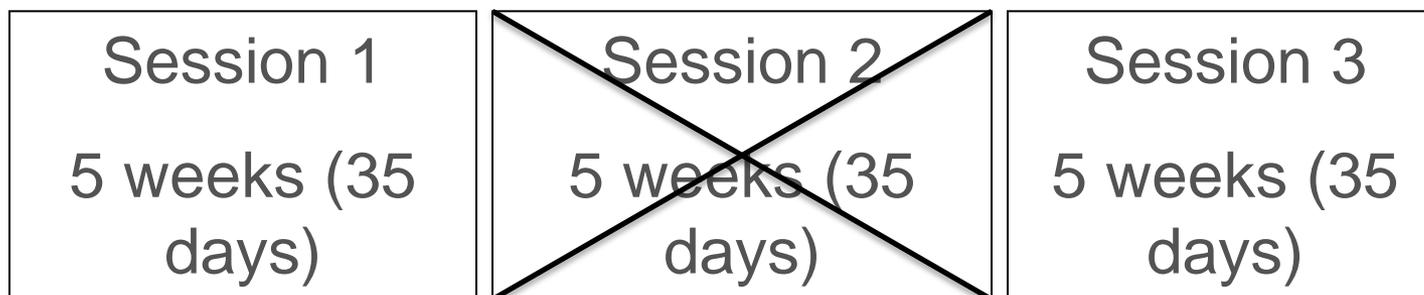
Denominator = 105 days. Per GEN 04-12, the institution must have a process to make this determination no later than 14 days after the LDA

Institution not required to take attendance:  $WD = 668.22(c)$ .

Denominator = 105 days.

# Modules - Example: A.2

- Student #2: Enrolls in all three Summer Sessions
  - Day 4 of Session 1, drops Session 2
  - Day 8 of Session 1, withdraws during the 1<sup>st</sup> 5-wk Session
  - Student does not provide written confirmation of return within the payment period



Drops Session 2: Day 4

Drops Sessions 1 and 3: Day 8

# Modules - Example: A.2

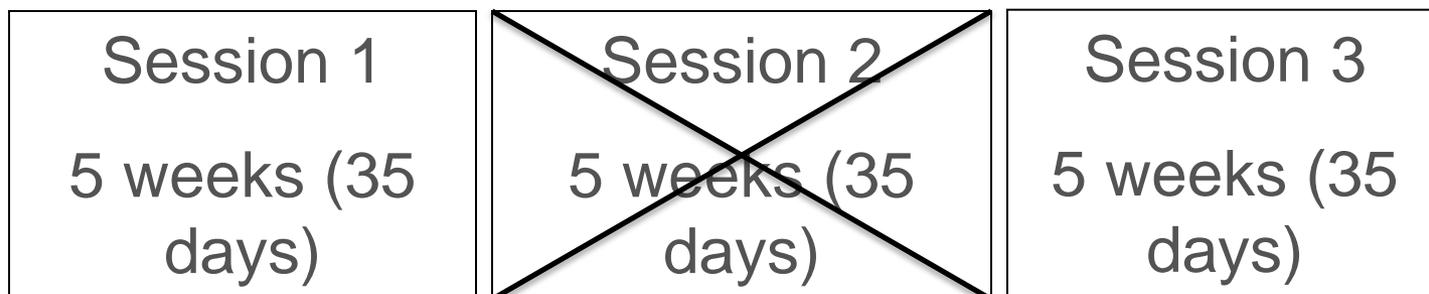
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## THE RESULTS:

- Step 1 – Recalculate Pell & Campus-based
- Step 2 – Determine earned & unearned amounts of TIV
  - Numerator = number of days attended (assume no breaks) 8 days
  - Denominator = 35 days each in Sessions 1 & 3, less any scheduled breaks or approved LOAs 70 days or .1142 or 11.4%

# Modules - Example: A.2

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Drops Session 2 on day 4, drops Sessions 1 and 3 on day 8

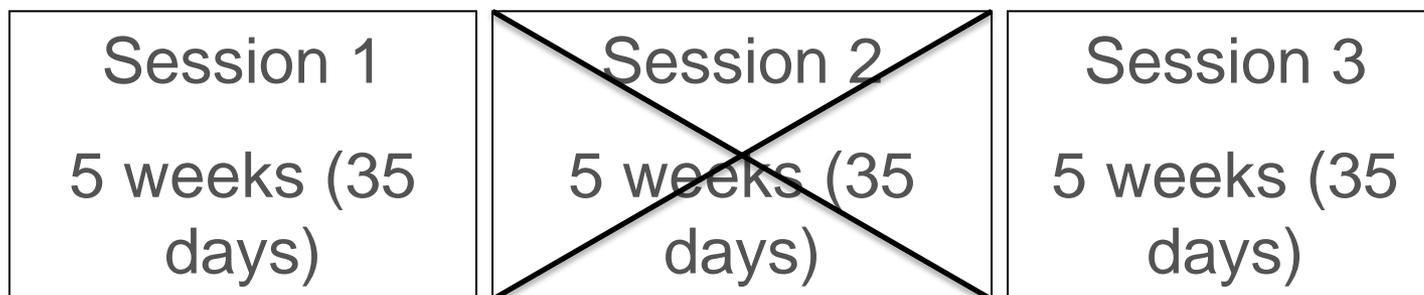
At an institution required to take attendance: WD = Day 8.  
Denominator = 70 days. Date of determination no later than day 22.

Institution not required to take attendance: WD = 668.22(c).  
Denominator = 70 days.

# Modules - Example: A.3

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- Student #3: Enrolls in all three Summer Sessions and drops Session 2 on Day 3, then ceases enrollment on Day 5 in the 1st 5-week Session, but provides written confirmation of future return in Session 3



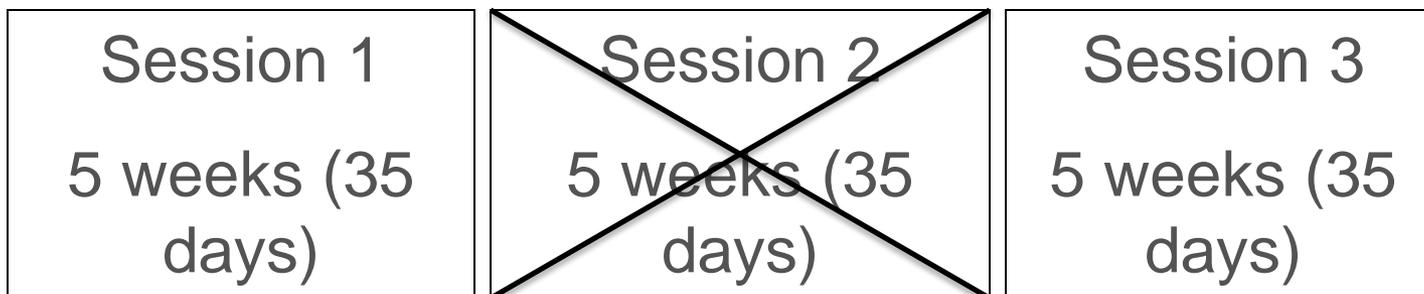
Drops Session 2: Day 3

Drops Sessions 1: Day 8

# Modules - Example: A.3

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- Institution must recalculate Pell & Campus-based aid, but no R2T4 calculation required because the student provided written confirmation of her/his planned return before the start of the 3<sup>rd</sup> module
- For the purpose of determining whether written confirmation is permitted to avoid withdrawing a student, we consider the number of days from the end of the module the student ceased attending. There are 35 days between Session 1 and Session 3.



# Modules - Example: B

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- Summer Sessions include three 5-week Sessions and 15-week Sessions

|                                 |                                |                                |
|---------------------------------|--------------------------------|--------------------------------|
| Session 1<br>5 weeks (35 days)  | Session 2<br>5 weeks (35 days) | Session 3<br>5 weeks (35 days) |
| Full Term - 15 weeks (105 days) |                                |                                |

# Modules - Example: B

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|                                 |                                |                                |
|---------------------------------|--------------------------------|--------------------------------|
| Session 1<br>5 weeks (35 days)  | Session 2<br>5 weeks (35 days) | Session 3<br>5 weeks (35 days) |
| Full Term - 15 weeks (105 days) |                                |                                |

Claire enrolls in two 15-week courses – this student is not considered to be enrolled in a program offered in modules

Doug enrolls in the first 5-week module and one 15-week course – this student is considered to be enrolled in a program offered in modules

# Modules - Example: C

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- Nonterm program includes three 5-week Sessions; there is 1 week between each session



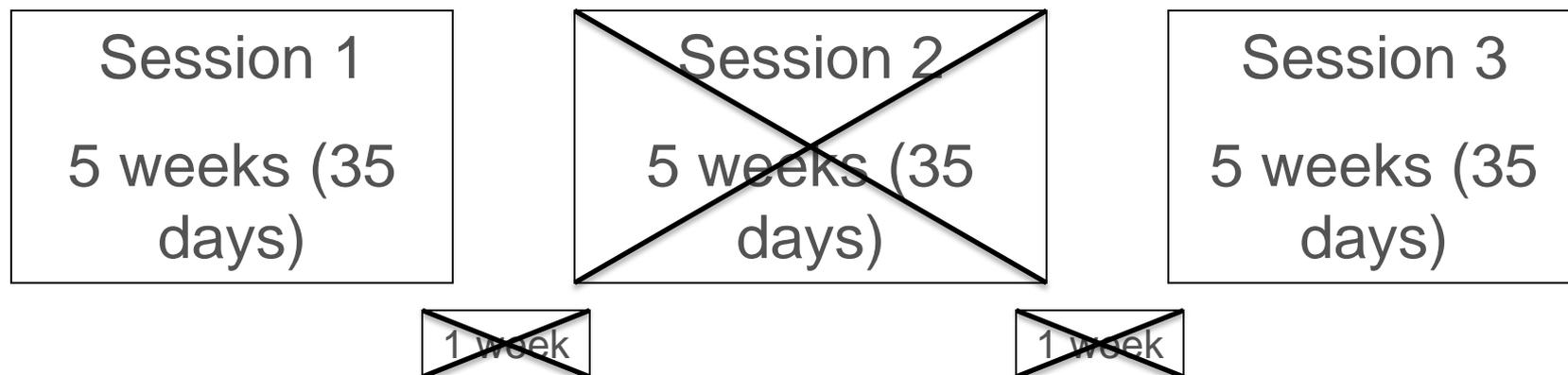
# Modules - Example: C.1

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- Connie begins Session 1 in a nonterm program, but withdraws on Day 5. She indicates that she wants to return at the beginning of Session 3 to resolve some health issues in the interim. Is she considered to have withdrawn?

# Modules - Example: C.1



- Is Connie considered to have withdrawn? Yes, on day 5.
- It will be 72 days before Session 3 begins. However, for the purpose of determining whether written confirmation is permitted to avoid withdrawing a student, we consider the number of days from the end of the module the student ceased attending. There are 49 days between Session 1 and Session 3.

# Modules - Example: C.2



- Connie's other option would be to seek a Leave of Absence beginning on Day 6 of Module 1 and ending the day before Session 3 begins. In this case, Connie would not be considered a withdrawal.

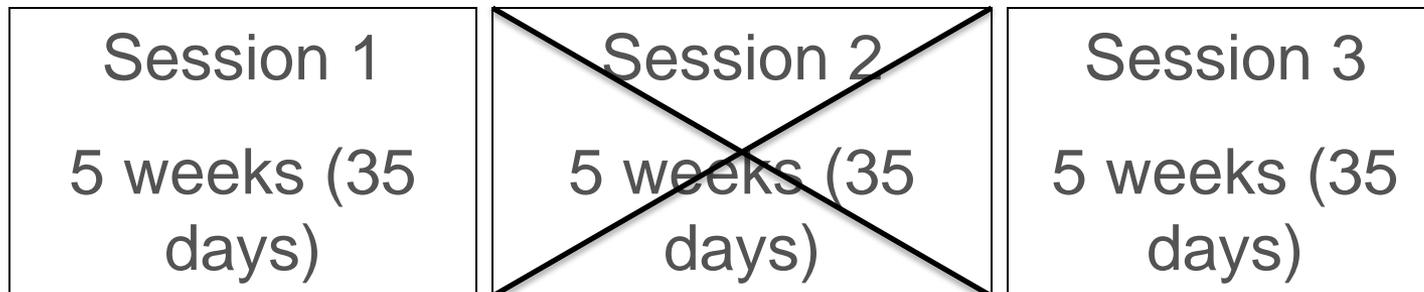
# Q & A

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- Q: What happens when the student doesn't return for the future module?
- A: The withdrawal date (WD) is -
  - At an institution required to take attendance = the last date of attendance (LDA)
  - At an institution not required to take attendance = found using one of the six options described in 34 CFR 668.22(c)(1)(i) – (vi)

# Modules – Example: D

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Day 4 – Withdraws from Session 1 and drops Session 2, but provides written confirmation of return to Session 3

Day 71 – Student does not return. WD = Day 4 at an institution required to take attendance; WD = determined using one of the options described in 34 CFR 668.22(c)(1)(i) – (vi) at an institution NOT required to take attendance

# Q & A

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- Q: What happens in a nonterm program when a student DOES return to a later module within the same PP or POE?
- A: If the student reenters the same nonterm program within 180 days, student is eligible for the same amount of Title IV, HEA funds prior to WD (see 668.4(f)).

If the student reenters the same nonterm program after more than 180 days, the student is treated as a transfer student beginning a new program. The institution treats the hours remaining in the program as if they are the student's entire program.

# Additional Resources

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- Dear Colleague Letter GEN-11-14 (July 2011)
- Dear Colleague Letter GEN-04-03 (November 2004)
- Dear Colleague Letter GEN-00-24 (December 2000)
- Program Integrity Q & A Website
  - <http://www2ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>
- R2T4 Website for the Free Calculator
  - <http://www.faaaccess.ed.gov/>

*Federal Student Aid Handbook – Volume 5*

Federal Register – October 29, 2010 (75 FR 66832)

# QUESTIONS?

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# Contact Information

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