



# R2T4: Modules and Terms Revised October

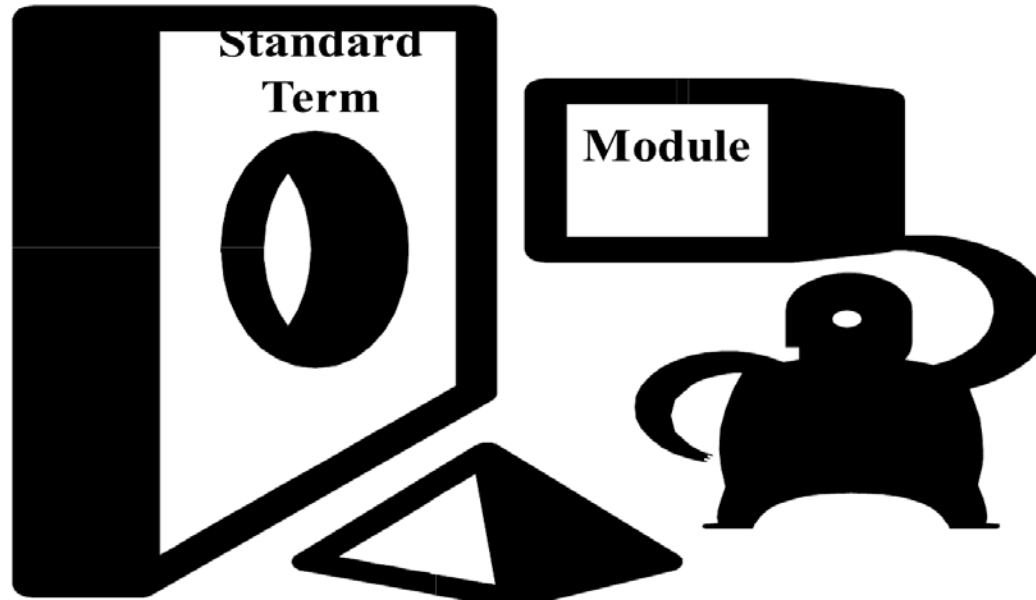
Replaces Fall 2013 Presentation

Kevin Campbell  
Training Officer

United States Department of Education

# What is a module?

“Fitting a square peg into a round hole...”



# 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....

# 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

# 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**

**2  
weeks**

**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 must not overlap other terms.**

# January Term or Winter session

Fall term

**TOTAL 19 WEEKS**

January term

Can be combined with a standard term

January term

Spring term

**TOTAL 19 WEEKS**

Or can be a non-standard term on its own

Fall term  
16 weeks

January term  
3 weeks

Spring term  
16 weeks

# 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 student did not begin attendance in all courses and an R2T4 calculation is required, recalculate Pell and send back Pell funds first before R2T4 calculation
    - R2T4 calculation will reflect adjusted correct Pell amount

# 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



# Summer Module Example

Session 1  
5 weeks

33 days

2 days

Session 2  
5 weeks

33 days

2 days

Session 3  
5 weeks

33 days

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 payment period or last known date of attendance (if not required to take attendance)
- Number of days in period = 103 days

# Module and Full Term Example

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

- 9/06 begins attendance in 6 credits in Full Term
- 9/06 begins attendance in 3 credits in Module 1

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

- 9/14 drops the 6 credits in Full Term
- 9/24 drops the 3 credits in Module 1

# Module and Full Term Example

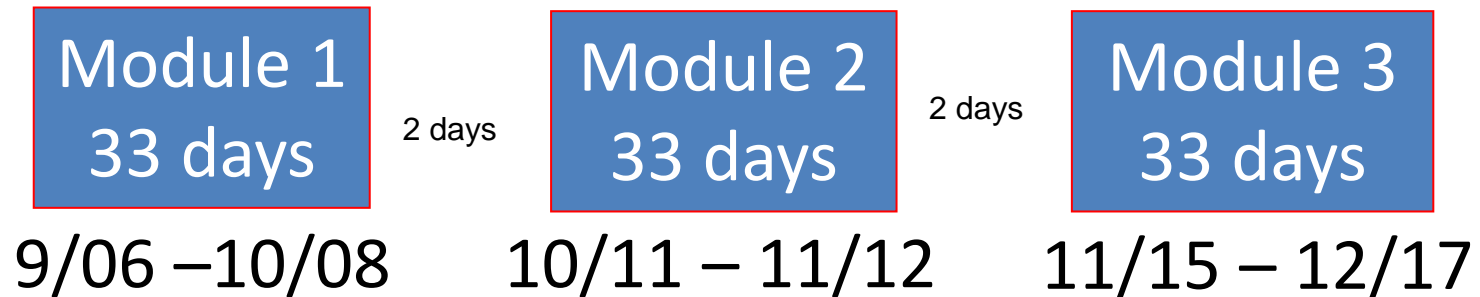
---

- Enrollment ends 9/24 with official withdrawal
- Scheduled to attend until 10/08 which is the end of Module 1
- Not the end of full term since those credits were dropped prior to end of Module 1
- R2T4 required
- Withdrawal date is 09/24, 19 days
- Enrollment period is 9/06 –10/08, 33 days
- $19/33 = .5757 = 57.6\%$

# Roommates Zack & Dave Example

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

- Not enrolled in Full Term; enrolled in Modules 1 and 2
- Neither student enrolls in or attends Module 3



- 9/06 both Z and D begin attendance
- and go on to complete 6 credits in Mod 1
- 10/01 Zack drops all credits in Mod 2
- 10/11 Dave drops all credits in Mod 2 and has not attended any class

# Roommates Zack & Dave Example

---

## Zack

- Not a withdrawal-- dropped Module 2 course before ceasing attendance in Module 1
- No R2T4 required
- Pell recalculation required if paid for Module 2

## Dave

- R2T4 required since withdrew *after* ceasing attendance
- Withdrawal date is 10/11, 36 days
- Enrollment period is 9/06 – 11/12, 68 days, Mods 1 & 2
- Pell Recalculation if paid for Module 2

# Case Studies



# 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

# Scenario 1 - Juan

---

- Juan is enrolled in a standard 16 week semester, all classes offered in modules
- The Pell Recalculation Date (PRD), called the census date by some schools, is the tenth day of class
- The standard semester has two 8 week sessions that do not overlap
- Juan completes the classes in the first 8 week session and drops the classes in the second session on the final day of the first 8 week session
- If Juan was a Pell recipient, does his Pell Grant have to be recalculated?
- Is a return recalculation required for Juan?



# Scenario 1 - Juan

---

Question 1: After beginning attendance in the payment period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

**YES**

If no, this is not a withdrawal. If yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

**NO**

If yes, this is not a withdrawal, however other regulatory provisions concerning recalculation (Pell/TEACH/IASG) may apply. If no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

**NO**

If yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.

# Scenario 1 - Juan

---

- Juan is enrolled in a standard 16 week semester, all classes offered in modules
- The Pell Recalculation Date (PRD), called the census date by some schools, is the tenth day of class
- The standard semester has two 8 week sessions that do not overlap
- Juan completes the classes in the first 8 week session and drops the classes in the second session on the final day of the first 8 week session
- If Juan was a Pell recipient, does his Pell Grant have to be recalculated? **YES**
- Is a return recalculation required for Juan? **YES**

# Scenario 2 - Serena

---

- Serena is enrolled in a standard 16 week semester, all classes offered in modules
- The PRD is the tenth day of the semester
- The standard semester has two 8 week sessions that do not overlap
- Serena completes the classes in the first 8 week session and drops the classes in the second session on the 12<sup>th</sup> day of the second 8 week session
- If Serena was a Pell recipient, does her Pell Grant have to be recalculated?
- Is a return recalculation required for Serena?

# Scenario 2 - Serena

---

Question 1: After beginning attendance in the payment period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

**YES**

If no, this is not a withdrawal. If yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

**NO**

If yes, this is not a withdrawal, however other regulatory provisions concerning recalculation (Pell/TEACH/IASG) may apply. If no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

**NO**

If yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.

# Scenario 2 - Serena

---

- Serena is enrolled in a standard 16 week semester, all classes offered in modules
- The PRD is the tenth day of the semester
- The standard semester has two 8 week sessions that do not overlap
- Serena completes the classes in the first 8 week session and drops the classes in the second session on the 12<sup>th</sup> day of the second 8 week session
- If Serena was a Pell recipient, does her Pell Grant have to be recalculated? **NO, ASSUMING SERENA ATTENDED AT LEAST ONE DAY IN EACH CLASS IN THE SECOND SESSION**
- Is a return recalculation required for Serena? **YES**

# Scenario 3 - Julie

---

- Julie is enrolled in a standard 16 week semester, all classes offered in modules
- The PRD is the tenth day of class
- The standard semester has two 8 week sessions that do not overlap
- Julie drops all classes in Session 2 on the second to last day of Session 1
- Julie completes the classes in the first 8 week session
- If Julie was a Pell recipient, does her Pell Grant have to be recalculated?
- Is a return recalculation required for Julie?

# Scenario 3 - Julie

---

Question 1: After beginning attendance in the payment period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

**NO**

If no, this is not a withdrawal. If yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

If yes, this is not a withdrawal, however other regulatory provisions concerning recalculation (Pell/TEACH/IASG) may apply. If no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

If yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.

# Scenario 3 - Julie

---

- Julie is enrolled in a standard 16 week semester, all classes offered in modules
- The PRD is the tenth day of class
- The standard semester has two 8 week sessions that do not overlap
- Julie drops all classes in Session 2 on the second to last day of Session 1
- Julie completes the classes in the first 8 week session
  
- If Julie was a Pell recipient, does her Pell Grant have to be recalculated? **YES**
- Is a return recalculation required for Julie? **NO**



# CORRECTION on Scenarios 4 & 5

- Scenarios 4 & 5 when presented at AASFAA both had a common element, the student completed Session 1 and did not have any classes scheduled in Session 2.
- This creates a gap in the student's attendance which I mistakenly thought required that the student provide written confirmation of the later return to Session 3 OR that the student be treated as withdrawn.
- Due to a question from an AASFAA member about this, I gave these scenarios more thought, conducted research and consulted with policy makers, (one policy maker said, "wow, we never considered that exact scenario, before!").
- The final determination was that a student who did not classes in Session 2, either by never registering for classes in that module or by dropping classes in that module before the end of Session 1, would NOT be required to be treated as a withdrawal AND would not be required to provide written confirmation of his or her return for Session 3.
- If a student dropped the classes in Session 2 on the last day of Session 1 or later and indicated that he or she would return for Session 3, written confirmation would be required or the student would be a withdrawal.
- The corrected scenarios follow.

# Scenario 4 - Ja Mel

---

- Ja Mel is enrolled in a standard 15 week semester, all classes offered in modules
- The PRD is the tenth day of the semester
- The standard semester has three 5 week sessions that do not overlap
- Each five week session begins on Monday and has five 7 day weeks
- There are never classes on Saturday or Sunday
- Ja Mel is enrolled for six hours in the first session and six hours in the third session for a total of twelve hours for the semester
- Ja Mel has zero hours in the second session
- Ja Mel completes the six hours in the first session and never shows up for the third session

# Scenario 4 - Ja Mel **CORRECTION**

Question 1: After beginning attendance in the payment period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

**NO**

If no, this is not a withdrawal. If yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

If yes, this is not a withdrawal, however other regulatory provisions concerning recalculation (Pell/TEACH/IASG) may apply. If no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

If yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.

## Scenario 4 - Ja Mel **CORRECTION**

---

- If Ja Mel was a Pell recipient, does her Pell Grant have to be recalculated?

No, not at the end of Module 1. If she does not, in fact return for Module 3, then she would be a withdrawal at that time and her Pell must be recalculated due to not starting attendance in Module 3

- Is a return recalculation required for Ja Mel?

No, not at the end of Module 1. If she does not, in fact return for Module 3, then she would be a withdrawal at that time an R2T4 would be required.

# Scenario 4 - Ja Mel **CORRECTION**

If an R2T4 is required, assuming Ja Mel did not return for Session 3, how many days are in the payment period?

66---33 from Session 1 and 33 from Session 3. The final Saturday and Sunday in Session 1 become part of the break since Ja Mel had no classes in Session 2. The final Saturday and Sunday in Session 3 are not part of the payment period since they occur after the last day of classes/exams.

- If a return is required, how many days did Ja Mel complete?

33 - But a school not required to take attendance could use the mid-point of the payment period, since Ja Mel was an unofficial withdrawal but for this student, the mid-point is also 33 days

# Scenario 5 - Frances **CORRECTION**

- Frances is enrolled in a standard 15 week semester, all classes offered in modules
- The PRD is the tenth day of the semester
- The standard semester has three 5 week sessions that do not overlap
- Each five week session begins on Monday and has five 7 day weeks
- There are never classes on Saturday or Sunday
- Frances is enrolled for six hours in the first session, three hours for the second session, and six hours in the third session for a total of fifteen hours for the semester
- Frances drops the three hours in session 2 on the 15<sup>th</sup> day of Session 1 but remains registered for the six hours in Session 3
- Frances completes the six hours in the first session

# Scenario 5 - Frances **CORRECTION**

Question 1: After beginning attendance in the payment period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

**NO**

If no, this is not a withdrawal. If yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

If yes, this is not a withdrawal, however other regulatory provisions concerning recalculation (Pell/TEACH/IASG) may apply. If no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

If yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.

# Scenario 5 - Frances **CORRECTION**

- After Session 1, is Frances considered a withdrawal or not?  
NO. While Frances originally had classes scheduled for Session 2, she dropped those classes on the 15<sup>th</sup> day of Session 1 which was before the end of Session 1.
- If Frances is a Pell recipient, must her Pell Grant be recalculated?  
NO, not at the end of Session 1. If Frances does not return for Session 3, a Pell recalc would be required
- Is a return recalculation required for Frances?  
NO, not at the end of Session 1. If Frances does not return for Session 3, An R2T4 would be required



# Scenario 5 - Frances **CORRECTION**

- If we treated Frances as a withdrawal after Session 1 and she shows up for Session 3, what do we do?

We should have never treated her as a withdrawal after Session 1 but if we did:

We have to reverse the Pell Recalculation.

We have to reverse the R2T4.

We have to reverse any actions regarding any overpayments.

We have to report her as “in school” to NSLDS if we had reported her as withdrawn.

We treat Frances as if she never withdrew.

# Scenario 6 - Frank **CORRECTION**

- Frank is enrolled in a standard 15 week semester, all classes offered in modules
- The PRD is the tenth day of the semester
- The standard semester has three 5 week sessions that do not overlap
- Each five week session begins on Monday and has five 7 day weeks
- There are never classes on Saturday or Sunday
- Frank is enrolled for six hours in the first session, three hours for the second session, and six hours in the third session for a total of 15 hours for the semester
- Frank drops the three hours in session 2 on the 15<sup>th</sup> day of Session 1 but remains registered for the six hours in Session 3 and continues with classes in Session 1
- Frank drops all of the classes in Session 1 on the 30<sup>th</sup> day of Session 1
- Frank gives written confirmation that he will return to school for the classes in Session 3

# Scenario 6 - Frank **CORRECTION**

Question 1: After beginning attendance in the payment period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

**YES**

If no, this is not a withdrawal. If yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

**NO**

If yes, this is not a withdrawal, however other regulatory provisions concerning recalculation (Pell/TEACH/IASG) may apply. If no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

**YES**

If yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.

# Scenario 6 - Frank **CORRECTION**

- After Session 1, is Frank considered a withdrawal or not? **NO**

- If Frank is a Pell recipient, must his Pell Grant be recalculated?

**NO, even though he never started classes in Session 2, he is still full time.**

- Is a return recalculation required for Frank? **NO**

- If we treated Frank as a withdrawal and he shows up for Session 3, what do we do?

**We would not have treated him as a withdrawal so no action would be required. If he was withdrawn by mistake, we would treat Frank as if he never withdrew.**

# Scenario 6 - Frank

---

- If we did not treat Frank as a withdrawal and he shows up for Session 3, what do we do?

There is no specific action to take. Always must ensure that the student begins attendance in each class used to calculate enrollment status for Pell/TEACH/Iraq Afghanistan Service Grant

- If we did not treat Frank as a withdrawal and he does NOT show up for Session 3, what do we do?

Written confirmation notwithstanding, Frank is now a withdrawal.

Recalc Pell first.

R2T4 calculation next.

Report Frank as a withdrawn student to NSLDS.

Exit Counseling requirements kick in if a DL borrower.

# Resources & References



# R2T4 References

---

- FSA Handbook, Volume 5
- Program Integrity Q & A website
  - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-ga.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>

# Department of Education Contacts

## Research and Customer Care Center

800.433.7327

[fsa.customer.support@ed.gov](mailto:fsa.customer.support@ed.gov)



## Reach FSA

855.FSA.4FAA -- 1 number to reach 10 contact centers!

*Campus Based Call Center*

*COD*

*CPS/SAIG*

*NSLDS*

*G5*

*eZ-Audit*

*School Eligibility Service Group*

*Foreign Schools Participation Division*

*Research and Customer Care Center*

*Nelnet Total & Permanent Disability Team*