



R2T4 and Modules

**NCASFAA Fall Conference**

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**Return of Title IV Funds:**  
Modules

David Bartnicki  
404-974-9312; david.bartnicki@ed.gov  
U.S. Department of Education

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**Programs  
& Courses  
Offered In  
Modules**

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**Offered In Modules**

- New rules define a program “offered in modules”
  - 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

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### R2T4 and Modules

#### Standard Term With Modules

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

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#### When is Student a Withdrawal?

- Student considered to be withdrawal if does not complete all days scheduled to complete within payment period/term
- School must document 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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#### Return After Withdrawal

- Modular term-based credit hour program
  - Withdrawn student may return to same program prior to end of payment period/period of enrollment

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**Written Confirmation Of Return**

- Student in modular program not considered a withdrawal if
  - Provides written confirmation of intent
    - Must be provided at the time of withdrawal
  - Student may change return date in writing
    - Must provide change prior to original return date

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**Written Confirmation Of Return**

- Nonstandard & Non-term 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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**After Written Confirmation Of Return**

- Student considered to be withdrawal if does not return as scheduled
- Withdrawal dates back to time that confirmation originally provided
  - Determine withdrawal date and days of attendance as if confirmation of future attendance never provided

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### R2T4 and Modules

**Calendar Days - Credit Hour Modules**

- Total calendar days include all days in which the student was scheduled to attend
  - Days of completed courses count if course does not span length of term
  - Exclude scheduled breaks of at least 5 consecutive days when student not scheduled to attend a module or other course offered during that period
- For a withdrawn student who has made schedule changes
  - *Do not count days of courses officially dropped prior to complete cessation of attendance*

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**Examples:  
R2T4  
&  
Modules**

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**Is 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 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 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

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### R2T4 and Modules

**Summer Module Example**

- Fall and Spring = standard terms
  - All courses last for full 15 weeks; 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 enrolled in the 5-week summer sessions are considered in programs "offered in modules" since none of the sessions span the entire length of the term (the 15-week period)

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**Summer Module Example**

Session 1 5 weeks	Session 2 5 weeks	Session 3 5 weeks
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33 days    2 days    33 days    2 days    33 days

Enrolls in all three summer sessions. Completes session 1, begins session 2, and stops attending on day 10. No withdrawal or confirmation to return.

- R2T4 required; Recalculate Pell before R2T4.
- Withdrawal date - day 10 session 2 (take attendance); 50% point if not required to take attendance (or LDA if applicable)
- Number of days in period = 103 days

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**Business Times University (BTU) Scenario**

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

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

**Standard Semester**  
Academic year is 30 weeks, 103 days  
Also offers courses in 3 Mods of term,  
Modules are 5 weeks, 33 days

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**BTU Example 1**

Full Term = 9/06 – 12/17

- 9/06 attends 6 credits in Full Term; enrolled in Mods 2 & 3
- 9/28 withdraws from 3 credits in Full Term
- 11/12 withdraws from 3 credits in Full Term

Mod 1 9/06 –10/08 N/E	2 days	Mod 2 10/11 – 11/12 3 credits	2 days	Mod 3 11/15 – 12/17 3 credits
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- 10/11 begins 3 credits in Mod 2
- 11/12 completes 3 credits in Mod 2
- 11/12 withdraws 3 credits in Mod 3

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**BTU Example 1**

- Enrollment ends 11/12 with completed course and official withdrawal\*
- Was to attend until 12/17
- R2T4 required
- Withdrawal date is 11/12, 68 days
- Enrollment period is 09/06 – 12/17, 103 days
- $68/103 = .6602 = 66.0\%$

\*complete and withdraw same day = withdrawal

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**BTU Example 2**

Full Term = 9/06 – 12/17

- 9/06 attends 6 credits in Full Term; enrolled in Mods 1 & 3
- 9/22 withdraws 3 credits in Full Term
- 12/17 completes 3 credits in Full Term

Mod 1 9/06 –10/08 3 credits	2 days	Mod 2 10/11 – 11/12 N/E	2 days	Mod 3 11/15 – 12/17 3 credits
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- 09/06 begins attendance in 3 credits in Mod 1
- 10/08 completes 3 credits in Mod 1
- 11/15 begins 3 credits in Mod 3
- 12/07 withdraws from 3 credits in Mod 3

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**BTU Example 2**

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

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**BTU Example 3**

Full Term = 9/06 – 12/17

- 9/06 attends 6 credits in Full Term; enrolled in Mod 1
- 9/14 withdraws 6 credits in Full Term

Mod 1 9/06 –10/08 3 credits	2 days	Mod 2 10/11 – 11/12 N/E	2 days	Mod 3 11/15 – 12/17 N/E
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- 09/06 begins attendance in 3 credits in Mod 1
- 9/24 withdraws 3 credits in Mod 1

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**BTU Example 3**

- Enrollment ends 09/24 with official withdrawal
- Was to attend until 10/08
- R2T4 required
- Withdrawal date is 09/24, 19 days
- Enrollment period is 09/06 –10/08, 33 days
- $19/33 = .5757 = 57.6\%$

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R2T4 and Modules

### BTU Example 4

Full Term = 9/06 – 12/17

- Not enrolled in Full Term; enrolled in Mods 1 & 2

<b>Mod 1</b> 9/06 – 10/08 6 credits	2 days	<b>Mod 2</b> 10/11 – 11/12 6 credits	2 days	<b>Mod 3</b> 11/15 – 12/17 N/E
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- 9/06 begin attendance in 6 credits in Mod 1
- Greg withdraws on 10/01
- Dave withdraws on 10/11

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### BTU Example 4

**Greg**

- No R2T4 required (dropped before ceasing attendance in Mod 1)
- Pell Recalculation if paid for Mod 2 (never attended)

**Dave**

- R2T4 required
- Withdrawal date is 10/11, 36 days
- Enrollment period is 9/06 – 11/12, 68 days (Mods 1 & 2)
- Pell Recalculation if paid for Mod 2 (never attended)

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### Non-Term Credit In Modules

Mod 1	Mod 2	Mod 3	Mod 4	Mod 5	Mod 6
33 days	33 days	33 days	33 days	33 days	33 days
09/06 - 10/08	10/11 - 11/12	11/15 - 12/17	01/03 - 02/04	02/07 - 03/11	03/14 - 04/15

Academic year is 30 weeks, 206 days  
Enrollment is for full academic year

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R2T4 and Modules

### Non-Term Credit in Modules

- 9/06 begins attendance
- 11/04 withdraws Mod 2 and Mod 3
- 11/04 confirms return Mod 4 on 01/03
- Out of school more than 45 days
- R2T4 required
- Withdrawal date is 11/04, 60 days
- Enrollment period is full academic year, 206 days
- $60/206 = .291 = 29.1\%$

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### Non-Term Credit In Modules

Mod 1 33 days	Mod 2 33 days	Mod 3 33 days	Mod 4 33 days	Mod 5 33 days	Mod 6 33 days
09/06 - 10/08	10/11 - 11/12	11/15 - 12/17	01/03 - 02/04	02/07 - 03/11	03/14 - 04/15

Academic year is 30 weeks, 206 days  
 Enrollment is for full academic year

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### Non-Term Credit in Modules

- 9/06 begins attendance
- 10/29 withdraws Mod 2
- 10/29 confirms return Mod 3 on 11/15
- Returns and completes Mod 3
- 01/12 withdraws Mod 4
- No confirmation of return
- R2T4 required
- Withdrawal date is 01/12
  - 54 days 9/06 -10/29
  - 43 days 11/15 - 01/12
- Enrollment period is full academic year, 206 days
- $97/206 = .4709 = 48.1\%$

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### R2T4 and Modules

**Resources  
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References**

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**Additional Resources**

- 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://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/>
- FSA Handbook, Volume 5
- 34 CFR 668.22; Federal Register – October 29, 2010
- FSA Assessments
  - <http://www.ifap.ed.gov/qahome/qaassessments/returntivism.html>

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**Training Feedback**

To ensure quality training we ask all participants to please fill out an online session evaluation

- Go to <http://s.zoomerang.com/s/DavidBartnicki>
  - Evaluation form is specific to David Bartnicki
- 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 concerns about training can be directed to [annmarie.weisman@ed.gov](mailto:annmarie.weisman@ed.gov)

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