

# Return to Title IV (R2T4) with Modules

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## LIMITATION OF TIME

The Return to Title IV discussion in this session will cover basic scenarios for credit hour and clock hour schools with standard terms and modules. There are other scenarios that may occur for which there are additional/different rules.

This training does not address the following scenarios (non-exhaustive list):

- Self-paced, nonterm programs
- Re-entry programs
- Loans with overlapping or abbreviated terms



# WITHDRAWAL

## Definition

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### Credit Hour Programs

- Student does not complete all the days in the payment period or period of enrollment.

### Clock Hour Programs

- Student does not complete all clock hours and weeks of instruction in the payment period or period of enrollment.

## Special Cases

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- Students who complete all graduation requirements before the days or are **not** considered withdrawn (do not need an R2T4).
- If students are taking Title IV aid eligible course and ineligible courses. If they withdraw from all Title IV aid eligible courses, they **are** considered withdrawn for aid purposes and a calculation must be done



# DETERMINING WITHDRAWAL DATE

## Official Withdrawals

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*Occurs when the student provides formal notice to the school that they will be withdrawing*

### **Attendance is Required**

- The last documented date of student participation in an academically related activity.

### **Attendance Not Required**

- Date the student begins the official withdrawal process, *or*
- The last documented date of student participation in an academically related activity.



# DETERMINING WITHDRAWAL DATE

## Unofficial Withdrawals

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*Occurs when:*

- *The student withdraws without providing formal notice, **or***
- *When a student fails to earn a passing grade in all courses taken*

### **Attendance is Required**

- The last documented date of student participation in an academically related activity.

### **Attendance Not Required**

- The midpoint (50% point) is used, **or**
- The last documented date of student participation in an academically related activity, at the school's discretion.

There are exceptions to this for students who do not provide notice due to accident, illness, grievous loss or other circumstances beyond their control. Refer to the FSA Handbook.



# ACADEMICALLY RELATED ACTIVITY

## Permitted

- The student attends a class (in person or online) where the students and professors meet at the same time.
- Taking an exam or submitting an assignment.
- Participating in an online course forum (discussion board, webinar, etc.)
- Participating in study group, group project, or other activity *assigned by the institution*
- Interacting with a professor about an *academic* matter

## Not Permitted

- Living on campus or participating in the campus meal plan.
- Going to academic advising or counseling.
- Logging into a school system (Blackboard, Canvas, etc.) *but not participating further.*



# ATTENDANCE POLICY

## Required to Take Attendance

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- All clock-hour schools are required to take attendance.
- Any school that sets a policy requiring attendance taking is mandatory
- Any school that is required to take attendance because of an outside entity (such as accrediting body)

## Not Required to Take Attendance

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- Schools that only require attendance the first day
- Schools that have an add/drop period with a census date
- Schools that only require faculty to report last day of attendance for students who earn all “F” grades





# R2T4 FROM A MODULE PROGRAM

## DEFINITION

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- Under the September 2, 2020, final regulations, the Department revised the definition of a program “offered in modules” for Title IV purposes to only include a program that uses a standard term or nonstandard-term academic calendar, is not a subscription-based program, and has a course or courses in the program that do not span the entire length of the payment period or period of enrollment

## Audience Poll: What type of modular program do you have?

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- Do you have a standard term academic year?  
Use the payment period for the calculation.
- Do you have a nonstandard-term academic year?  
Use the period of enrollment for the calculation.
- Do you have a course or courses in the program that do not span the entire length of the payment period or period of enrollment?  
Your program could have a mix of courses to be modular



# A PROGRAM OFFERED IN MODULES

## Let's take a look

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- If all the courses in a program span an entire payment period or period of enrollment, the program is not considered to be offered in modules for any student who withdraws during that period.
- Conversely, if none of the courses in a program for a particular payment period or period of enrollment span the entire period, the program is offered in modules for a student who withdraws during that period.
- If some courses span the entire period but some do not (modules), the program is offered in modules for any student scheduled to attend at least one course that does not span the entire period and who withdraws during the period.

For example, an institution offers a credit-hour program in semesters with two optional summer sessions. All the courses in the fall and spring semesters span the entire length of the semester. The two summer sessions are offered sequentially and are each seven weeks long. The institution chooses to combine the summer sessions into one term. Students have the option to enroll in either session or both sessions. The fall and spring semesters are never considered to be offered in modules for any student who withdraws because all classes span the entire length of the payment period (the term). However, for the summer sessions, where the payment period is the term comprising both sessions, all students who withdraw are withdrawing from a program offered in modules (with each session being a module) because none of the courses offered span the entire length of the payment period.



# R2T4 FROM A MODULE PROGRAM

## When is a student not considered an R2T4

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- For all programs offered in modules, a student is considered to have withdrawn for Title IV purposes if the student ceases attendance at any point prior to completing the payment period or period of enrollment, unless the school obtains written confirmation from the student at the time of the withdrawal that they will attend a module that begins within the established timeframes later in the same payment period or period of enrollment or meets one of the R2T4 withdrawal exemptions

## When a student is considered an R2T4

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- for a student in a standard or nonstandard-term program, the student ceases attendance and is not scheduled to begin another course within a payment period or period of enrollment for more than 45 calendar days after the end of the module the student ceased attending, unless the student is on an approved leave of absence



# R2T4 MODULE EXCEPTIONS

## DEFINITION

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- The withdrawal exemptions for successful completion of a module or a combination of modules that cumulatively contain 49% or more of the number of days in the payment period (excluding scheduled breaks of five or more consecutive days and all days between modules) and
- Successful completion of coursework equal to or greater than the coursework required for the institution's definition of a half-time student in the payment period
- These exceptions only apply to programs using modules.

## When a student is not considered an R2T4

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- Successful completion means that the student has earned a passing grade, or grades as outlined within an institution's overall academic grading policy.
- If an institution's general academic grading policy has established that a "D" grade is considered a passing grade, then receipt of a "D" grade for a course would be considered successful completion
- Withdrawals (Ws), incompletes (Is) and failures of any kind (earned or unearned Fs) do not count as successful completion.



# R2T4 MODULE EXCEPTION

## Calculating the 49% completion percentage

To calculate whether the student has successfully completed a module or modules containing 49% or more of the number of days within a payment period, the school will need the following information:

- a. Overall number of days that make up an entire payment period (typically from the beginning of the first class to the last final exam)
- b. Number of days associated with scheduled breaks of 5 or more consecutive days that apply to all students who enroll in the term
- c. Number of days in between all modules offered during the payment period.  
This is based on breaks between all modules offered in the payment period, not what modules the student enrolls in. For a break to be 'between' modules, there must be a module before and a module after the break. If modules overlap, there may be no days in between modules.
- d. Number of days the student successfully completed within a module or combination of modules



# R2T4 MODULE EXCEPTION

## Calculating the Payment Period

- a. First subtract any scheduled breaks of 5 consecutive days or more that apply to all students who enroll in the term AND all the break days that exist between all modules, from the number of days in the entire payment period.
- b. Remember that the denominator for a given period will be the same for all students within the same program of study regardless of what modules a student enrolls in.
- c. Unlike the R2T4 calculation itself, the number of days in the withdrawal exemption denominator will not be adjusted for individual student enrollment.
- d. Any modules that start prior to or end after the normal standard term dates (including intersessions attached to a regular term for Title IV purposes) will NOT change the number of days counted in the overall payment period length used in the denominator in the R2T4 withdrawal exemption calculation.
- e. The days the student successfully completes in any module that partially falls outside the normal standard term dates (including intersessions attached to regular terms) will still count towards the numerator in the withdrawal exemption calculation when determining how many days the student successfully completed within a module.



# R2T4 MODULE EXCEPTION

## Calculating the 49% completion percentage

Once the number of days in the payment period is obtained, the school will divide the number of days within the modules the student has successfully completed (numerator) by the number of days in the payment period or period of enrollment after any breaks are excluded (denominator). If the resulting figure is 49% or more, the student meets the withdrawal exemption and is not considered withdrawn for R2T4 purposes.

For purposes of performing this calculation, a day is included in the numerator if that day was included in at least one module or full-term course that the student successfully completed and is not part of a break of at least 5 consecutive days where no coursework was taking place.

Even if a student is enrolled in a full-term course, the school will still subtract set break days between all modules within a payment period or period of enrollment. Full-term courses do not impact the counting of break days between modules when determining if the 49% withdrawal exemption was met.

NO ROUNDING OF PERCENTAGES

ONLY COUNT OVERLAPPING DAYS ONCE



# R2T4 MODULE EXCEPTION

## SUCCESSFUL COMPLETION OF HALF TIME COURSEWORK

A student is not considered to have withdrawn if the student successfully completes coursework equal to or greater than the coursework required for the institution's definition of a half-time student for the payment period.

Successful completion of half-time coursework is not dependent on the length or number of days associated with the modules successfully completed. If the student has successfully completed half-time coursework, regardless of the module(s) length, the student would meet the half-time completion withdrawal exemption.





# R2T4 MODULE EXCEPTION

## CASE STUDY SCENARIO

A student is enrolled in a semester with 5 modules and the student enrolls in one three credit-hour course in each module and then withdraws after successfully completing modules 1 and 2, the school needs to determine if the student meets any of the withdrawal exemptions. A module is 20 days in length and there are no breaks of 5 days or more between modules. The student earns a D and B in the six credits taken in module 1 and 2.

1. What is the completion percentage?
2. Is the student eligible for an exemption based on the number of days attended?
3. Is the student eligible for an exemption based on successful half-time completion?
4. What if the student earned a D and an F?
5. If the student is eligible for an exemption, what would be the calculation of the R2T4?
6. If the student isn't eligible for an exemption what would be the calculation of the R2T4?



# R2T4 AND MODULES

## Some other considerations

1. If a withdrawn student returns to the school and re-enters the same program within the same payment period or period of enrollment for a term-based program offered in modules, the student is treated as though they did not cease attendance and the school must “undo” the R2T4 calculation
2. for a student who returns to a term-based credit hour program offered in modules within the same payment period or period of enrollment, the school must restore the student’s original Title IV program funds to the original amounts, with no adjustments required for partial attendance of a module.
3. if a student did not attend a module that they were originally scheduled to attend during the time the student was away from the school, the school must adjust the student’s original Title IV fund amounts to taking into account that the student never began the courses in that module (e.g. Federal Pell Grant mandatory recalculations, etc.)
4. A school may not delay performing an R2T4 calculation to see if the student will return later in the payment period or period of enrollment. It must follow the regulatory deadlines.
5. Written confirmation of attendance in a future module must be received before the module begins.



# R2T4 AND MODULES

QUESTIONS?



**THANK YOU FOR ATTENDING!**

**Don't forget to do your survey!**

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