

R2T4 FOR MODULES

Anita Olivencia | Training Officer
U.S. Department of Education

03/01/2021

AGENDA

- 1 Regulations
- 2 Exemptions
- 3 Scheduled Days
- 4 Resources



REGULATIONS

Final Rules published September 2, 2020

R2T4 REGULATIONS

The timeframe is **based on the timing of the withdrawal or ceasing attendance** itself, not on the timing of the payment period start date.

A program is “offered in modules” if the program uses a standard term or nonstandard-term academic calendar, is not a subscription-based program, and a course or courses in the program do not span the entire length of the payment period or period of enrollment (34 CFR 668.22(l))

R2T4 – ACADEMIC ATTENDANCE

34 CFR 668.22(l) and 600.2

- Expanded “Academic attendance” and “attendance at an academically-related activity” to include all requirements outlined in our new academic engagement definition under 34 CFR 600.2

Effective July 1, 2021

Academic engagement: Active participation by a student in an instructional activity related to the student's course of study that—

- (1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;
- (2) Includes, but is not limited to—
 - (i) **Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;**
 - (ii) Submitting an academic assignment;
 - (iii) **Taking an assessment or an exam;**
 - (iv) **Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;**
 - (v) Participating in a study group, **group project, or an online discussion that is assigned by the institution;** or
 - (vi) **Interacting with an instructor about academic matters;** and
- (3) *Does not include, for example—*
 - (i) Living in institutional housing;
 - (ii) Participating in the institution's meal plan;
 - (iii) *Logging into an online class or tutorial without any further participation;* or
 - (iv) Participating in academic counseling or advisement.

RETURN AFTER WITHDRAWAL

- If returning in the same payment period, the student is treated as if he or she did not cease attendance
 - The school must “undo” the R2T4 calculation
- Restore student’s original amounts with no adjustment for partial attendance of a module
 - Except if a student never began all of their courses
 - Adjustments may need to be made to the original Title IV award amounts, such as Pell Grant recalculations

WITHDRAWALS & EXEMPTIONS

R2T4 – MODULE WITHDRAWAL QUESTIONS

Questions to help determine if a student enrolled in modules has withdrawn:

1. Did the student cease to attend, or fail to begin attendance in a scheduled course that was included in the institution's calculation of the student's Title IV awards for the payment period or period of enrollment?
 - If yes, go to question 2
 - If no, student is not a withdrawal

R2T4 – MODULE WITHDRAWAL QUESTIONS

2. When the student ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses in the period?
 - If yes, student is not a withdrawal, but Pell recalculations may apply
 - If no, go to question 3

3. When the student ceased to attend or failed to begin attendance in a scheduled course, did the student complete all the requirements for graduation?
 - If yes, student is not a withdrawal, but Pell recalculations may apply
 - If no, go to question 4

R2T4 – MODULE WITHDRAWAL QUESTIONS

4. When the student ceased to attend or failed to begin attendance in a scheduled course, did the student successfully complete:
- a module or combination of modules that contain 49% or more of the number of days of the payment period (excluding scheduled breaks of 5 consecutive days or more and all days between modules); OR
 - coursework equal to or greater than the coursework required for the institution's definition of a half-time student for the payment period?
 - If yes to either question, student not a withdrawal, but Pell recalculations may apply
 - If no, go to question 5

R2T4 – MODULE WITHDRAWAL QUESTIONS

5. Did the student confirm attendance in a later module in the payment/enrollment period (45-day rule for standard or nonstandard programs)
 - If yes, not a withdrawal, but Pell recalculations may apply
 - If no, student is a withdrawal



WRITTEN CONFIRMATION

34 CFR 668.22(a)

New Regs effective July 1, 2021
(early implementation permitted)

For **standard and nonstandard term programs offered in modules**, excluding subscription-based programs, written confirmation is for a module or course within the same payment period/period of enrollment that begins *no later than 45 calendar days after the end of the module the student ceased attending*

For a **subscription-based program** written confirmation is for a date that occurs within the same payment period or period of enrollment and *is no later than 60 calendar days after the student ceased attendance*

For a **non-term program**, written confirmation is for a date that is *no later than 60 calendar days after the student ceased attendance*

WITHDRAWAL EXEMPTIONS

34 CFR 668.22(a)

Effective July 1, 2021

Not considered withdrawn if student successfully completes:

- 1.) All requirements for graduation from his or her program before completing the days or hours in the period that the student was scheduled to complete
- 2.) One module that includes 49% or more of the number of days in the payment period
- 3.) A combination of modules that when combined contain 49% or more of the numbers of days in the payment period; or
- 4.) Coursework equal to or greater than the coursework required for the institution's definition of a half-time student

HOW TO COUNT DAYS FOR THE 49% EXEMPTION

The denominator consist of this net total:

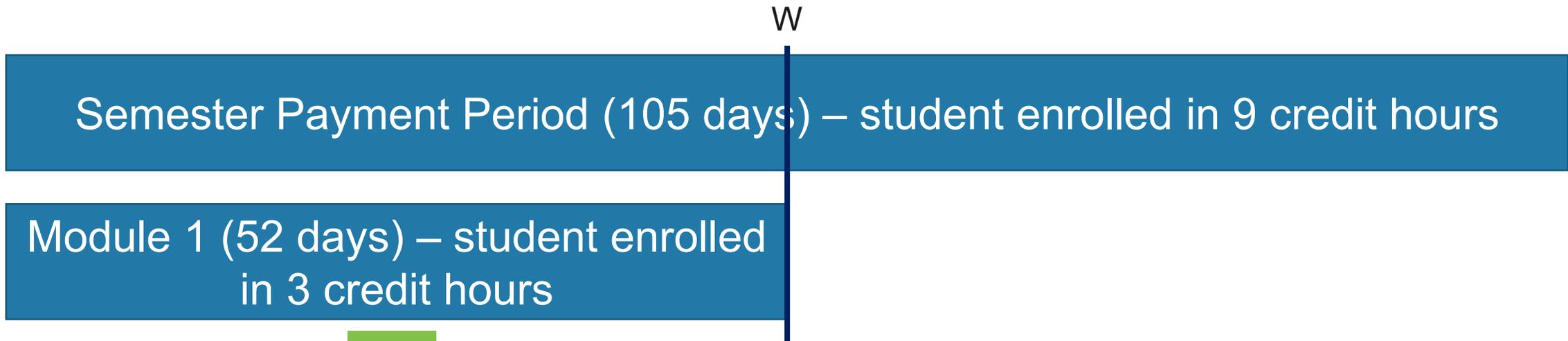
ADD 

- the overall number of days in the payment period from when the first modules starts to the last final exam

SUBTRACT 

- any scheduled breaks of 5 days or more consecutive days
- any breaks in between modules

R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 1



F

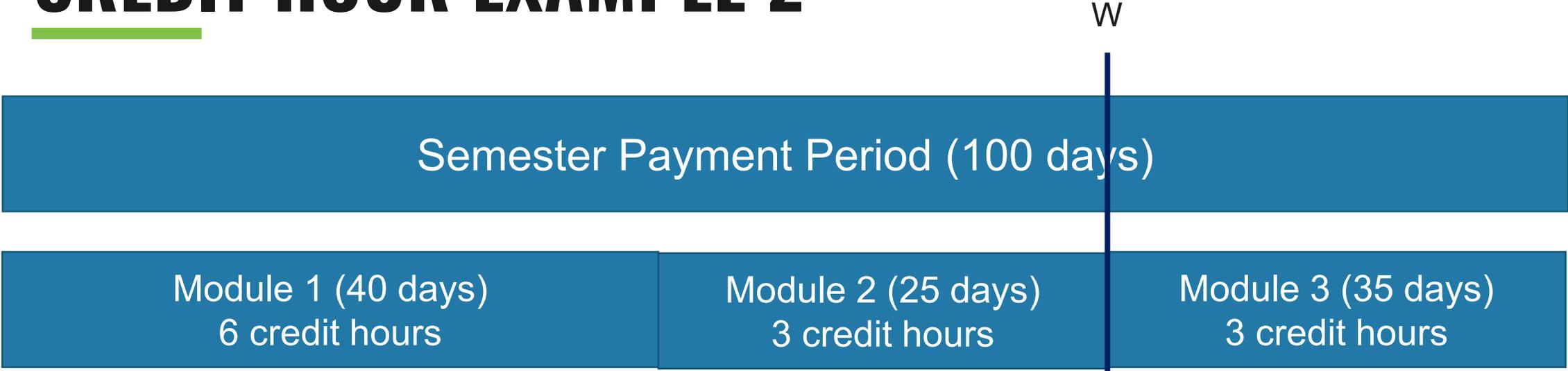
Required or Not Required

$$52 \text{ days} / 105 \text{ days} = 49.5\%$$

W = Withdrawal

Grades

R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 2



C & F

F

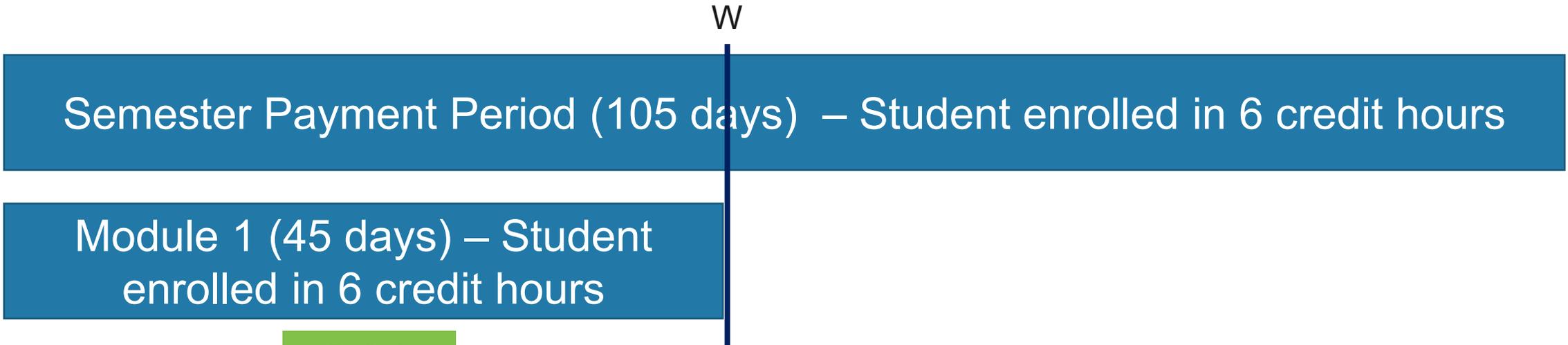
Required or Not Required

$$40 \text{ days} / 100 \text{ days} = 40\%$$

W = Withdrawal

Grades

R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 3



B & A

Required or **Not Required**

$$45 \text{ days} / 105 \text{ days} = 42.8\%$$

W = Withdrawal **Grades**

SCHEDULED DAYS

SCHEDULED DAYS

In a program offered in modules, determining scheduled days will depend on several factors:

1. Whether the school uses R2T4 Freeze Date;
2. The Title IV programs the student was eligible for; and
3. The modules/courses the student attended.



R2T4 – R2T4 FREEZE DATE (OPTIONAL)

Two ways to determine the number of scheduled days;

1. Using the student's enrollment **schedule** at a fixed point to determine the number of days the student is scheduled to attend during the period for R2T4 purposes ("R2T4 freeze date"), or
2. Monitor changes in the student's enrollment **schedule** throughout the period (no R2T4 freeze date)
 - fluctuations in a student's enrollment status (adding or dropping coursework throughout the period) may cause the number of days to change

R2T4 – SCHEDULED DAYS IN MODULES

Using an R2T4 freeze date

- Subsequent enrollment fluctuations will typically not alter the number of days
 - Reminder – always include days in modules in denominator if attended module
- The R2T4 freeze date, can coincide with other dates (census dates, Pell recalculations dates, etc.) or be a separate date
 - Similar to Pell recalculation dates, institutions may use multiple R2T4 Freeze Dates for multiple modules

R2T4 – SCHEDULED DAYS IN MODULES

- If the institution uses an R2T4 Freeze Date, the days in a module are included in the R2T4 calculation **if the student attends the module or is enrolled in the module on the R2T4 Freeze Date.**
- If the student withdraws **BEFORE** the R2T4 Freeze Date the modules the student attended or was enrolled for as of the withdrawal date are factored into the denominator.

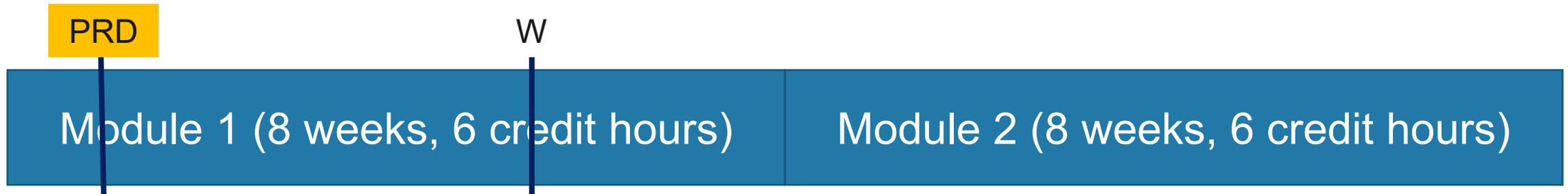
R2T4 – SCHEDULED DAYS IN MODULES

- If not using an R2T4 Freeze Date, the answer depends in part on the type of Title IV aid the student is eligible to receive.
- Eligible for Pell Grant, Iraq-Afghanistan Service Grant, and/or TEACH Grant funds scheduled days are the modules the student attended.
- Eligible for Direct Loan or FSEOG funds, the days in a module that must be included in the R2T4 calculation are the modules and course the student was enrolled in on the first day of the period or at any time during the period.

R2T4 – SCHEDULED DAYS IN MODULES

EXAMPLE 1

No R2T4 freeze date (Pell only recipient)



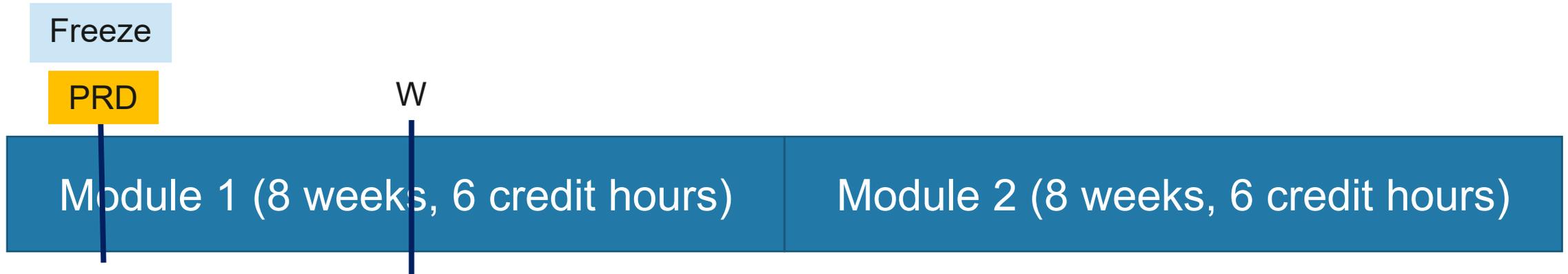
- If school paid full-time Pell, must perform a mandatory Pell recalculation and pay the student a ½ time Pell amount
- The student never attended module 2, *the days in module 2 are NOT factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date

R2T4 – SCHEDULED DAYS IN MODULES

EXAMPLE 2

R2T4 freeze date (Pell only recipient)



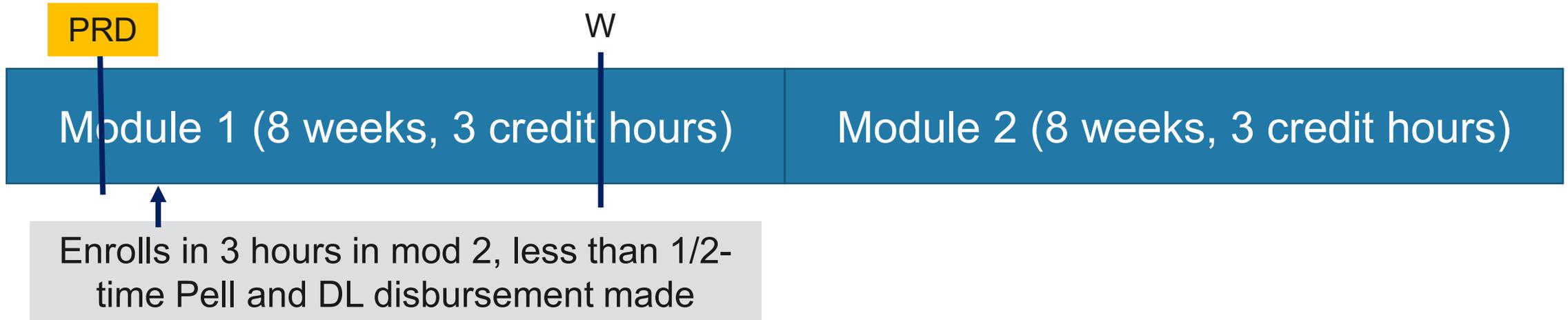
- School must perform a mandatory Pell recalculation and pay a ½ time Pell
- Enrolled in as of the school's R2T4 freeze date for modules 1 and 2, *the days in both modules are factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

R2T4 – SCHEDULED DAYS IN MODULES

EXAMPLE 3

No R2T4 freeze date (Pell recipient and later eligible for DL Funds)



- School does not have to do a Pell recalculation; loan funds do not have to be adjusted since student started a class and was registered $\frac{1}{2}$ time at time of disbursement
- School did not use an R2T4 Freeze Date and the student was awarded a Direct Loan.
- Factor in the days of any module the student enrolled in throughout the payment period.
- Therefore, *the days in both modules 1 and 2 are factored into the R2T4 calculation.*

W = Withdrawal PRD = Pell Recalculation Date

R2T4 – SCHEDULED DAYS IN MODULES

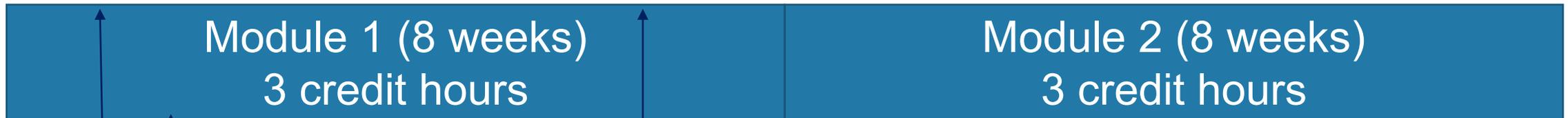
EXAMPLE 4

R2T4 freeze date (Pell recipient and later eligible for DL Funds)

Freeze

PRD

Withdraws
from Mod 2



Less than ½ time Pell disbursed. Enrolls after PRD in mod 2. School originates and disburses DL in Mod 1 because student met ½ time enrollment for DL

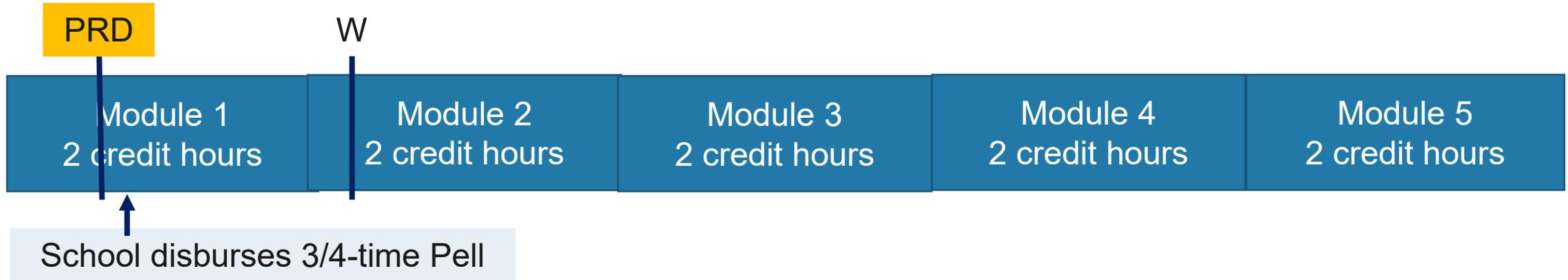
- School does not have to do a Pell recalculation; loan funds do not have to be adjusted since student started a class and registered ½ time at time of disbursement
- As of the R2T4 freeze date was only enrolled in module 1 AND the student never attended at least one day in module 2.
- *Only the days in module 1 are factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

R2T4 – SCHEDULED DAYS IN MODULES

EXAMPLE 5

No R2T4 freeze date (Pell only recipient)



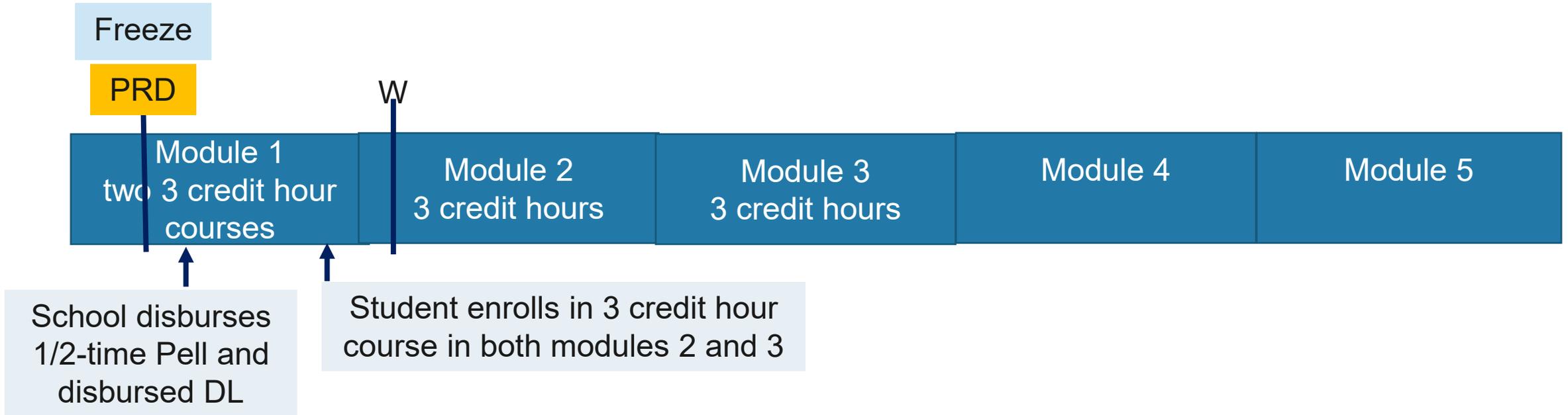
- School must perform a mandatory Pell recalculation and pay the student a less than ½ time Pell amount (only started 4 hours)
- Since the student only received Pell Grant funds and the school did not use an R2T4 Freeze Date, the school will only use the days from the module(s) that the student *actually attended*. Since the student attended module 1 and 2, regardless of the amount of Pell Grant funds received, *the days in module 1 and 2 are factored into the R2T4 calculation.*

W = Withdrawal PRD = Pell Recalculation Date

R2T4 – SCHEDULED DAYS IN MODULES

EXAMPLE 6

R2T4 freeze date (Pell and DL recipient)



- School does not have to do a Pell recalculation; loan funds do not have to be adjusted since student started a class and registered 1/2 time at time of disbursement
- Though the student was only enrolled in coursework in module 1 as of the R2T4 freeze date, since the student attended at least one day in modules 1 and 2 but never attended module 3, *ONLY the days in module 1 and 2 ARE factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

TO FREEZE OR NOT?

Your R2T4 Freeze Date policy must be applied consistently to all students in the same program. However, you are permitted to update your R2T4 policy, including its R2T4 Freeze Date, for a payment period or period of enrollment that has not yet begun. An institution is not permitted to update its R2T4 Freeze Date policy during a period.



REMINDERS & RESOURCES

R2T4 – COVID-19 FLEXIBILITIES

- CARES Act Section 3508 and May 15, 2020 Electronic Announcement
 - For students who begin attendance during a qualifying payment period or period of enrollment and subsequently withdraw due to COVID-19, the *CARES Act*:
 - Waives requirements to return *Title IV* funds through Return of *Title IV* funds (R2T4) requirements;
 - Excludes that period from the student's Subsidized Loan usage;
 - Excludes Pell Grant funds received from lifetime eligibility; and
 - Cancels Direct Loan and TEACH Grant funds received for the period
 - Applicable for any student who begins attendance in a *payment period or period of enrollment* that includes March 13, 2020, or begins between March 13 and *the last date that the national emergency is in effect*, and subsequently withdraws from the period as a result of COVID-19-related circumstances

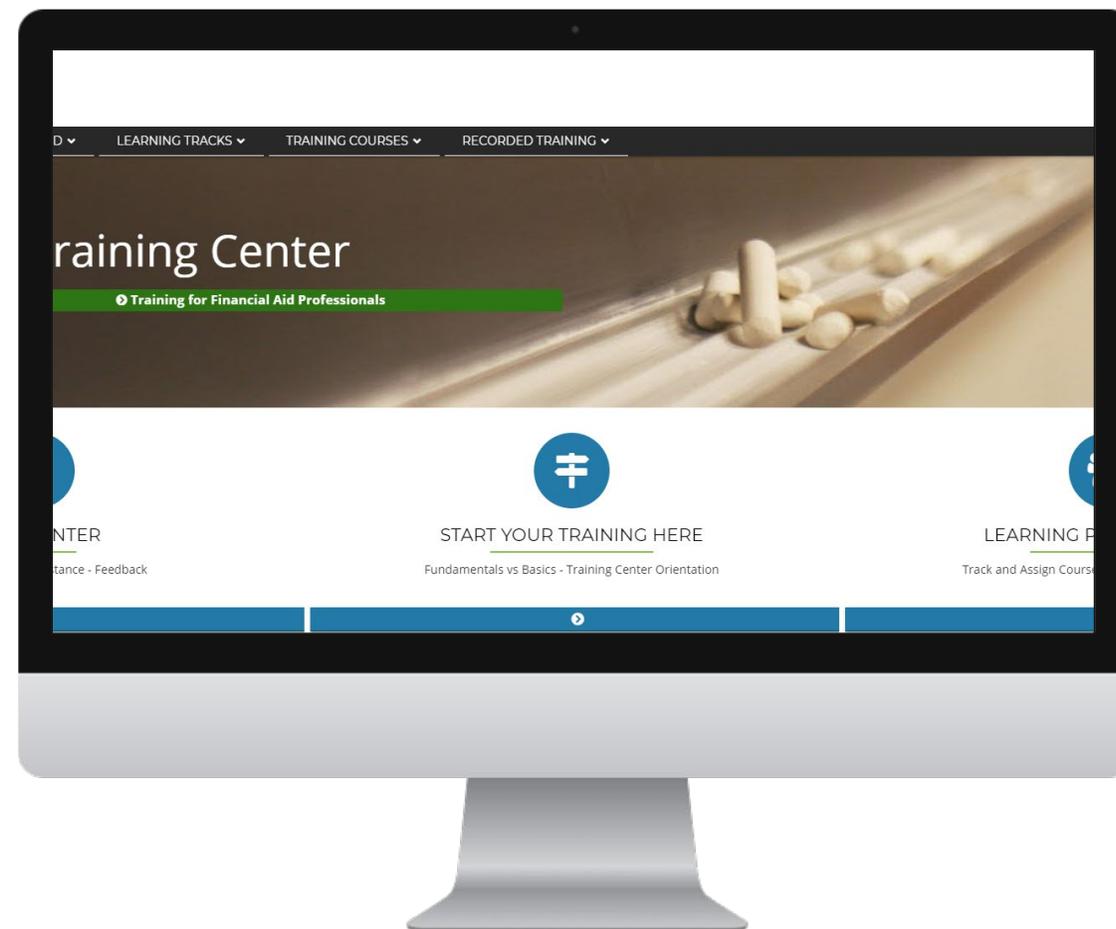
REFERENCES

- Distance Education and Innovation Final Rule
- [Federal Register from September 2, 2020](#)
- Program Integrity Q & A website (Knowledge Center Home Page)
- [Return of Title IV Funds topic Q&As](#)
- [August 20, 2021 Electronic Announcement](#)
- SAP/R2T4 CARES Act provisions
- [May 15, 2020 Electronic Announcement](#)
- Distance Education and Innovation Policy Webinar Recordings and Materials
- [DCL ANN-21-07](#)

FSA TRAINING CENTER

fsatraining.ed.gov

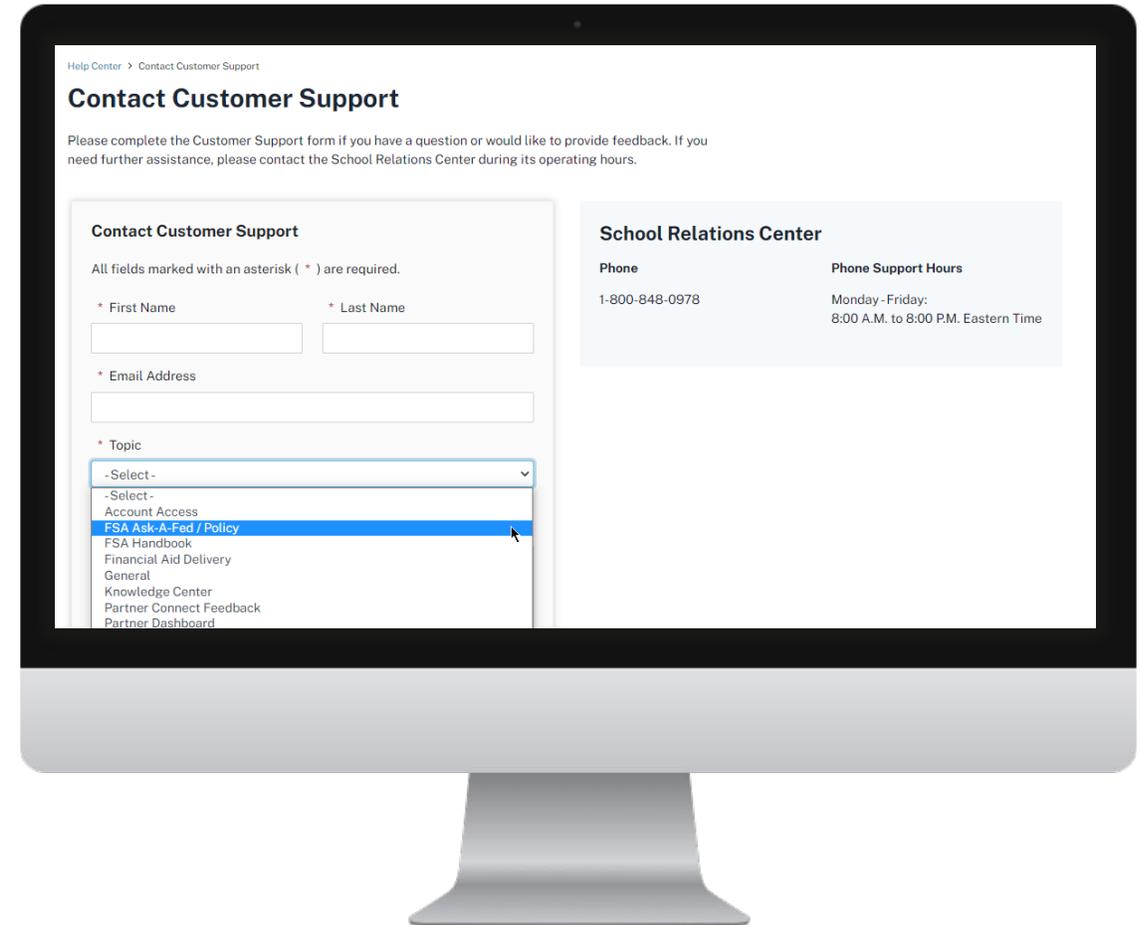
Check out learning tracks, software training, recorded policy videos here, and register for *FSA Fundamentals Training* series or *FSA Basics for New Staff* course.



GETTING HELP

fsapartners.ed.gov/help-center/

For policy questions, use *Contact Customer Support Form* in Help Center on FSA Partner Connect. Choose “Ask A Fed/Policy” in Topic dropdown list.





TRAINING FEEDBACK

All attendees receive email from FSA with link to online evaluation

- Helps ensure quality training
- Informs FSA of areas for improvement
- Serves as effective tool for “listening” to our school partners

QUESTIONS

