



*Radically Righteous R2T4:  
New Regulations for  
Modular Withdrawals*

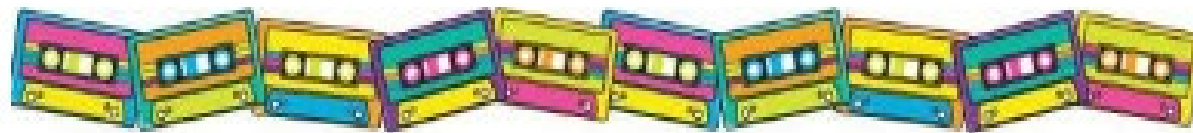
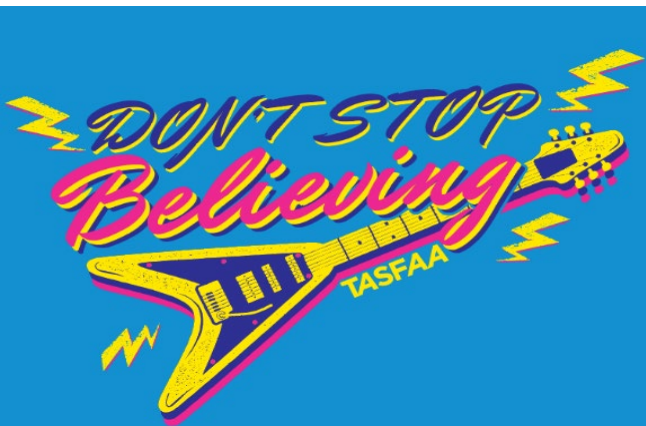
*Kelly Holder  
Leann Eaton*

*Middle Tennessee State University*

# R2T4 – New Rules from the Distance Education and Innovation Regulations

The effective date of these new regulations was July 1, 2021 (unless a school chose to implement early).

- Order of Return Changed – Removed ACG, SMART, and Perkins but included Iraq & Afghanistan Service Grants.
- Approved Leave of Absence (LOA) in Subscription Program
- Expanded what can be included in “Academic attendance” and “attendance at an academically-related activity”.
- **Modules**



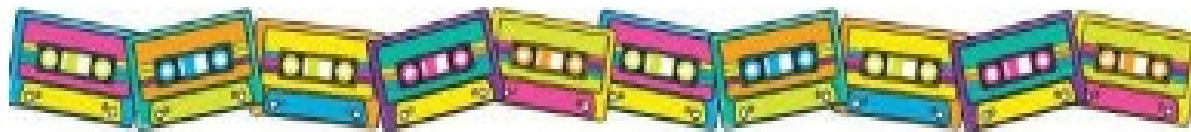
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# R2T4 - Modules

- Definition of “modules”:

“Except for subscription-based programs and nonterm programs, a program is “offered in modules” if a course or courses in the program **do not span the entire length** of the payment period or period of enrollment.”

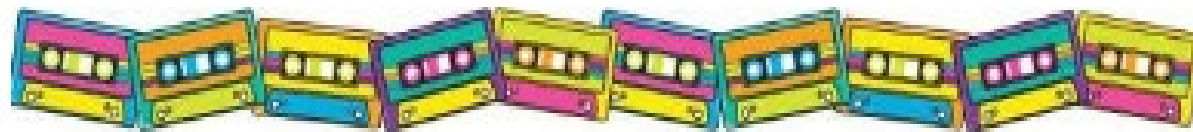


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# R2T4 – Considered Withdrawn

- Re-entry timeframe and withdrawal
  - For a student in a standard or nonstandard-term program, excluding a subscription-based program, the student is considered withdrawn if the student ceases attendance and is not scheduled to begin another course within a payment period or period of enrollment *for more than 45 calendar days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 approved leave of absence

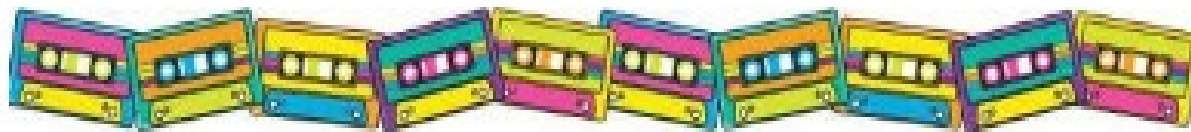
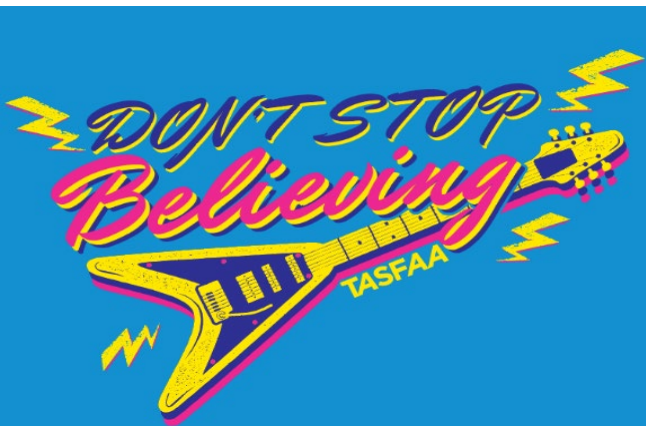


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# R2T4 – Written Confirmation

- A student is not considered to have withdrawn if the institution obtains written confirmation from the student at the time of withdrawal that he or she will attend a later module in the same payment period/period of enrollment; and
  - For standard and nonstandard term programs, excluding subscription-based programs, that module begins *no later than 45 calendar days after the end of the module the student ceased attending*
  - For a *non-term program*, a student is not considered to have withdrawn if the institution obtains written confirmation from the student at the time that would have been a withdrawal of the date that he or she will resume attendance, and that date is *no later than 60 calendar days after the student ceased attendance*
  - May **change the date of return** that begins later in the payment period or period of enrollment provided it is in writing prior to the return date AND within the calendar days listed above.



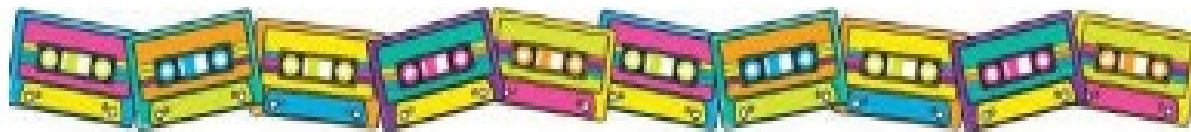
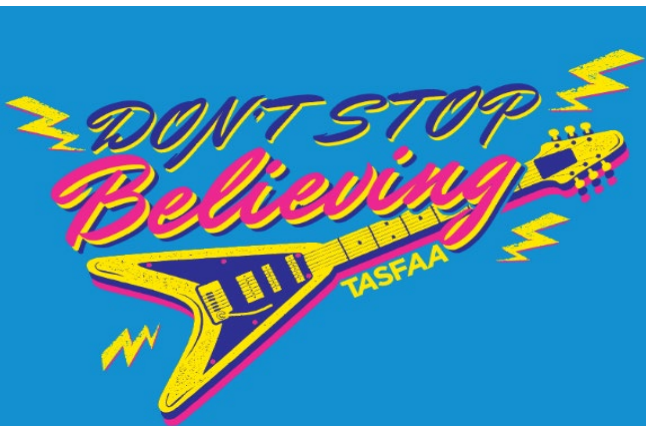
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# Withdrawal Exemptions #1

- Withdrawal exemptions for *all programs*
  - A student who completes all the requirements for graduation from his or her program before completing the days or hours in the period that he or she was scheduled to complete is not considered to have withdrawn
    - This applies to all programs (with or without modules)



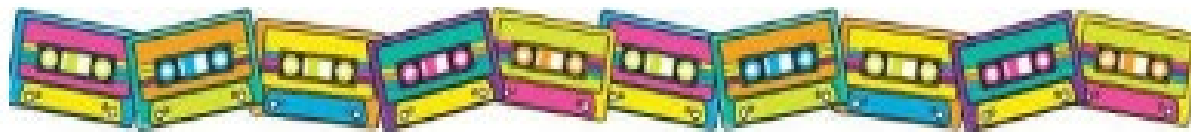
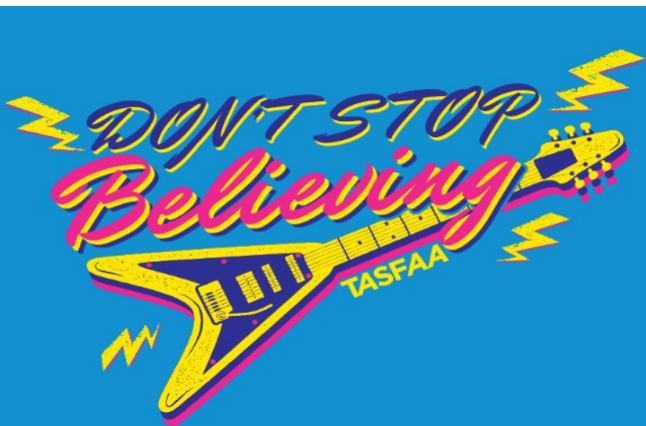
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# R2T4 – Withdrawal Exemptions #2

- Withdrawal exemption for *programs with modules*
  - In a program offered in modules, a student is not considered to have withdrawn if the student *successfully completes*—
    - ***One module or a combination of modules that includes 49 percent 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***
      - 49% may NOT be rounded up (i.e. 48.7% CANNOT be rounded up to 49%)
      - 49% is based on the number of days in the overall payment period, not 49% of the modules the student was enrolled in for a particular payment period
      - Successful completion means earning a **passing** grade



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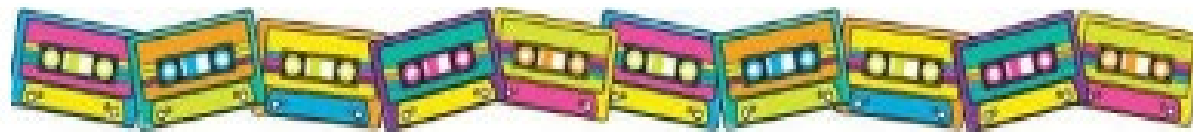


# How to calculate 49%

|                                     |                               |  |                               |                              |  |
|-------------------------------------|-------------------------------|--|-------------------------------|------------------------------|--|
| Full-term:<br>5/17 - 8/6<br>82 days |                               |  |                               |                              |  |
| S3A<br>5/17 - 6/4<br>19 days        |                               |  | S3C<br>6/28 - 7/16<br>19 days |                              |  |
| S6A<br>5/17 - 6/25<br>40 days       |                               |  | Break<br>2 days               | S6B<br>6/28 - 8/6<br>40 days |  |
|                                     | S5A<br>5/24 - 6/25<br>33 days |  |                               | S5B<br>7/6 - 8/6<br>32 days  |  |
|                                     | S3B<br>6/7 - 6/25<br>19 days  |  |                               | S3D<br>7/19 - 8/6<br>19 days |  |

## Example:

- 82 days in Full-term
- Minus the 2 days between all modules (& breaks of 5 days or more is applicable)
- 80 days in the payment period (denominator)
- Cannot round up!
- Student enrolled in 3 credits in S5A and 3 credits in S3C. Earns a grade of C in 3 credits for S5A but drops S3C after S5A ends. S5A meets for 33 days.  $33 \text{ days} / 80 \text{ days} = 41.25$  or 41%



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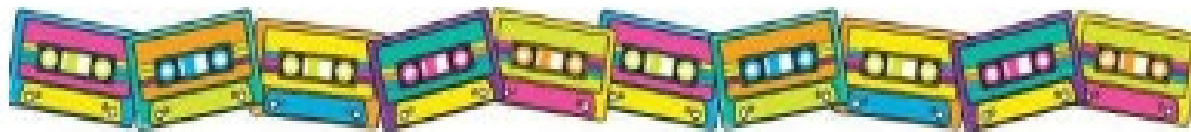
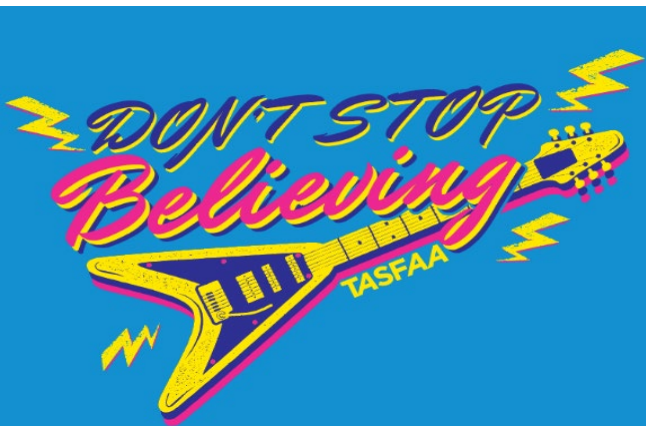






# R2T4 – Withdrawal Exemption #3

- Withdrawal exemption for *programs with modules*
  - In a program offered in modules, 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 under § 668.2 for the payment period**
      - Successful completion means earning a passing grade
      - Incompletes, earned F grade, etc. are not successful completion
      - ½ time enrollment is at least half the workload of the applicable minimum requirements outlined in the definition of a full-time student



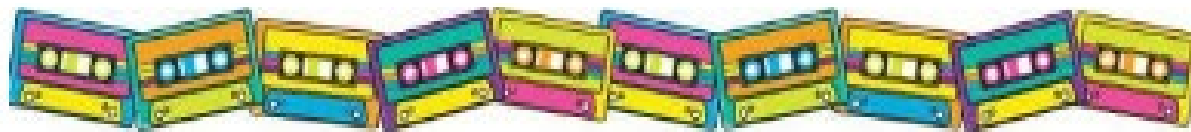
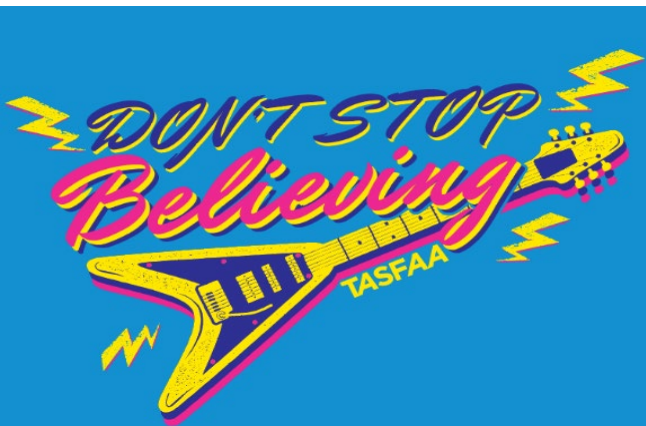
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# R2T4 Calculation

- Days Scheduled to Attend (R2T4 Denominator)
  - Exclude scheduled breaks of 5 or more consecutive days
  - Exclude breaks that, when combined with a module the student is not scheduled to attend, become 5 or more consecutive days

**\*\*These are not a new changes.\*\***



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New

## Days Scheduled to Attend (R2T4 Denominator)

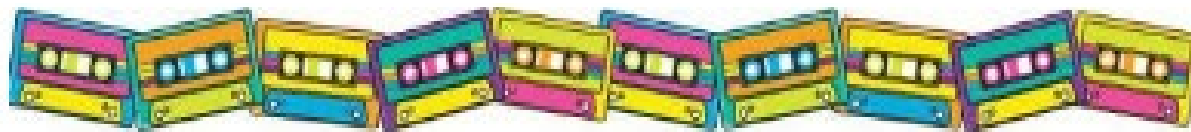
School has two options to determine number of days student was scheduled to complete in the period that contains modules:

### 1) R2T4 Freeze Date (RFD):

- Using student's enrollment schedule at a fixed point based on registration or enrollment practices of most students

### 2) No R2T4 Freeze Date (No RFD):

- Using student's enrollment status that was eventually used to determine amount of student's Title IV aid for the period
- Adding and dropping classes throughout the period could cause the number of days to change up until the student's withdrawal

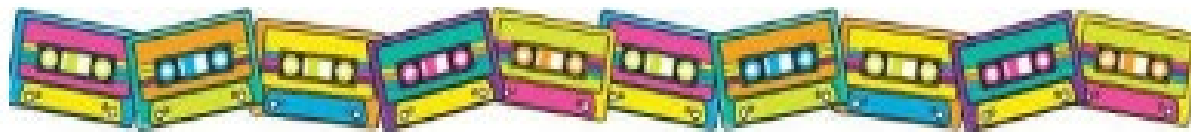
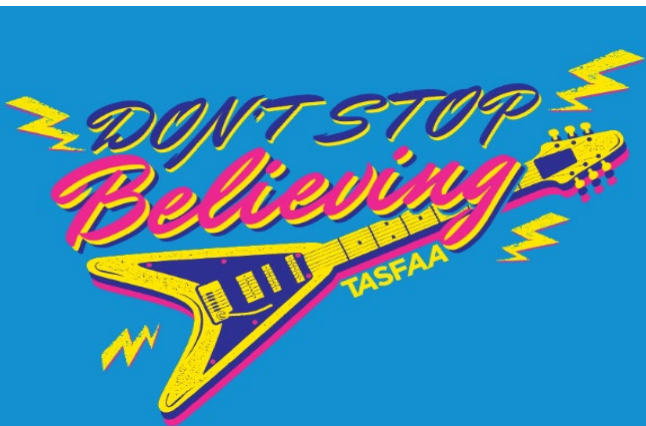


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## Using R2T4 Freeze Date

- If using RFD, school must determine number of days student was scheduled to complete in the period as of the RFD.
- Must include module days in R2T4 calculation denominator if student either:
  - Was enrolled in the module as of the RFD; **or**
  - Attended at least one day in a module in which the student was not enrolled on the RFD but was eventually included when determining the amount of the student's Title IV aid

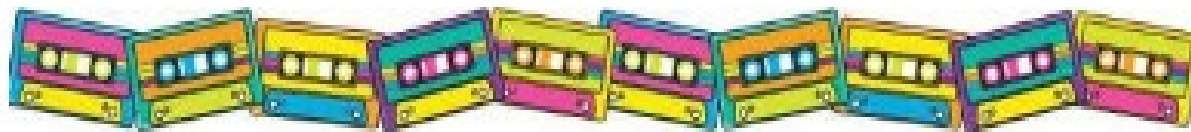
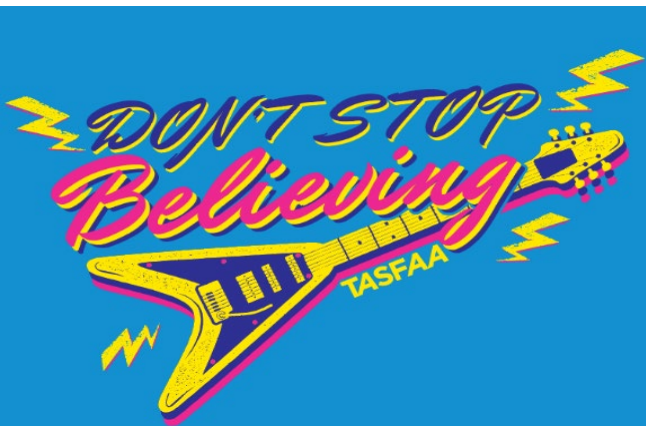


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# Setting the R2T4 Freeze Date

- RFD must be set in accordance with registration practices of most students under school's registration/enrollment policy for the period
- RFD cannot occur prior to the timeframe when most students enroll for classes for the period
- Not permitted to structure timing of students' enrollment such that most students are only enrolled in a single module when RFD occurs, but then enroll in other modules and receive more Title IV aid after the RFD
- Students are permitted to register for future modules after RFD as long as RFD is based on practices of most students under school's registration/enrollment policy

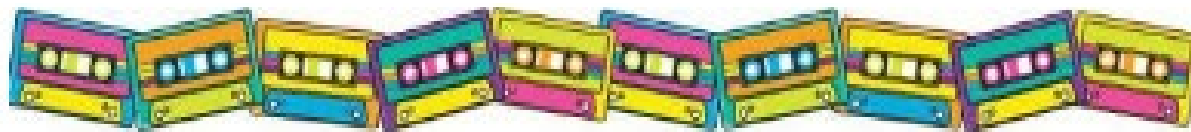
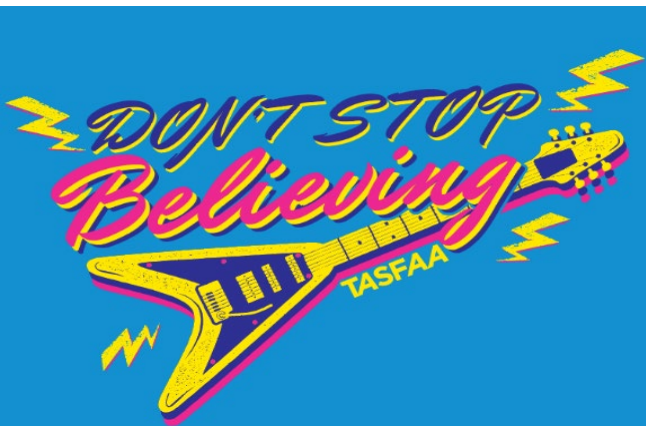


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## No R2T4 Freeze Date

- You must include the days in a course or module in the denominator of an R2T4 calculation if:
  - For students eligible for a Federal Pell Grant, an Iraq and Afghanistan Service Grant (IASG), or a Teacher Education Assistance for College and Higher Education (TEACH) Grant, if the student attended at least **one** day in the course/module; or
  - For students eligible for a Direct Loan or Federal Supplemental Educational Opportunity Grant (FSEOG) funds during the period, if the student attended at least **one** day in the course/module **or** was **enrolled or registered in the course/module for the period at any time on or after the first day of the period, even if the student did not attend the course/module.**

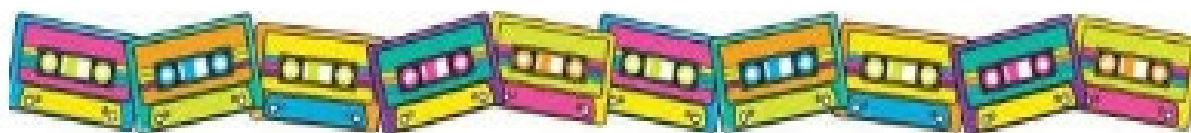


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# No R2T4 Freeze Date

- Please note that "eligible" for Direct Loan funds means that the funds can be included in the disbursed or could have been disbursed column in the R2T4 calculation.
- Whatever approach the institution establishes to identify days a student was scheduled to complete within modules, the institution needs to ensure that the process is spelled out clearly in your R2T4 policy.

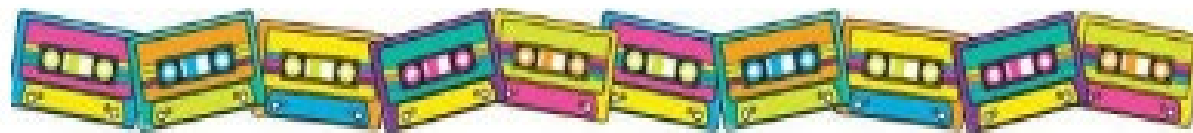


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# Loans: Aid that could have been disbursed

- In all Title IV loan programs, a promissory note **must be signed** for a loan to be included as aid that could have been disbursed in an R2T4 calculation. The signature may be obtained after the student withdraws but must be signed before the school performs the R2T4 calculation.
- In addition, if a school has an affirmative confirmation process set up to actively determine if a student wants a Direct Loan, if the student declines or fails to respond to the request, the Direct Loan would not be included as aid that could have been disbursed.



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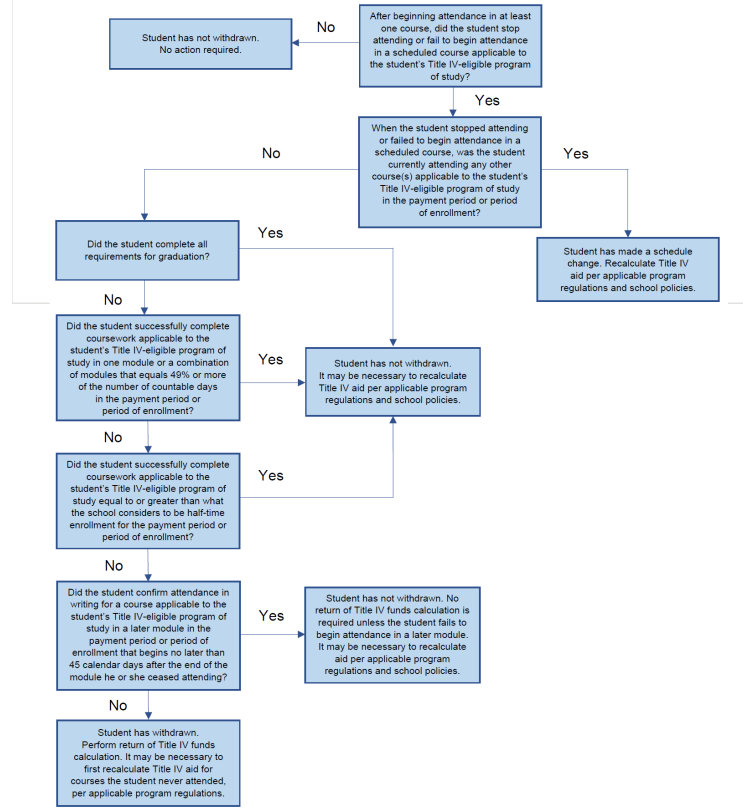






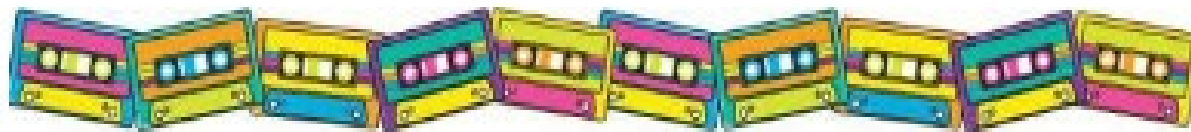
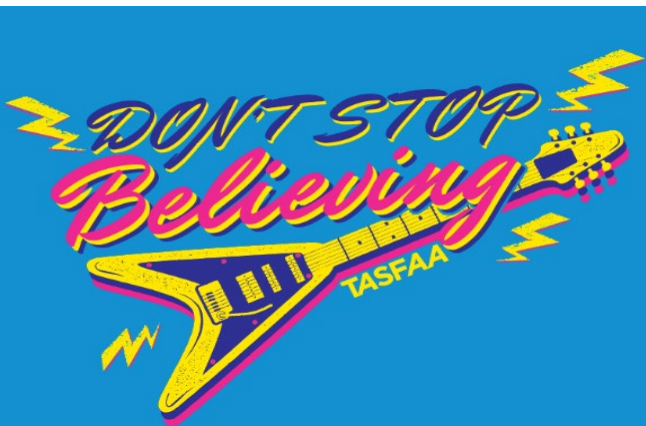
### Determining Whether a Student Has Withdrawn from a Standard- or Nonstandard-Term Program Offered in Modules

Effective July 1, 2021 with Possible Early Implementation



© 2021 NASFAA (revised 8/31/21)

10:59:40 AM 3/21/2022

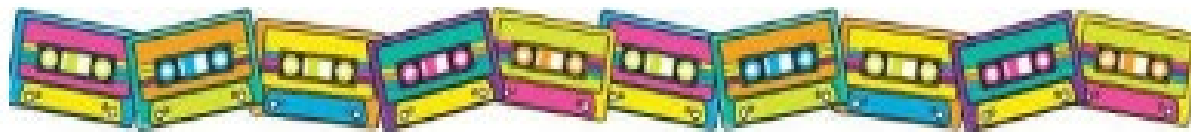
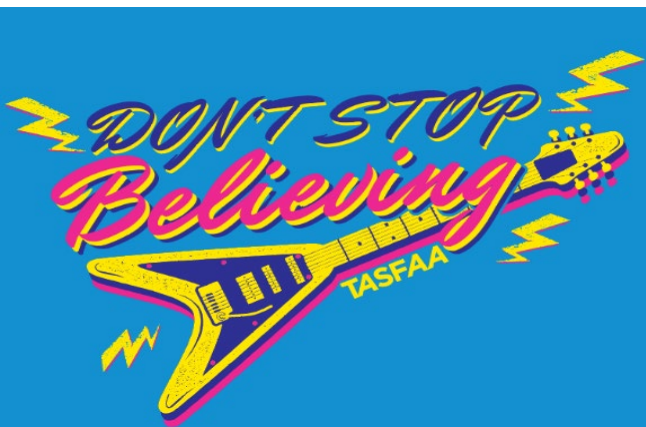


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# Institutional charges associated with a program offered in modules

- For purposes of determining the amount of institutional charges to use in the R2T4 calculation, an institution must always use the initial charges assessed the student for the entire payment period or period of enrollment.
- An institution only accounts for adjustments to those charges made prior to the student's withdrawal (i.e., for a change in enrollment status unrelated to the withdrawal).
- This also applies to situations where the institution charged the student for classes in multiple modules, but the denominator of the R2T4 calculation only consists of the days in a single module.

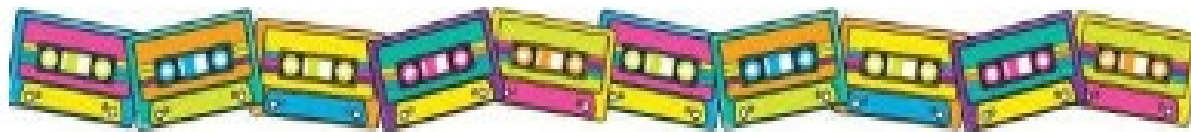
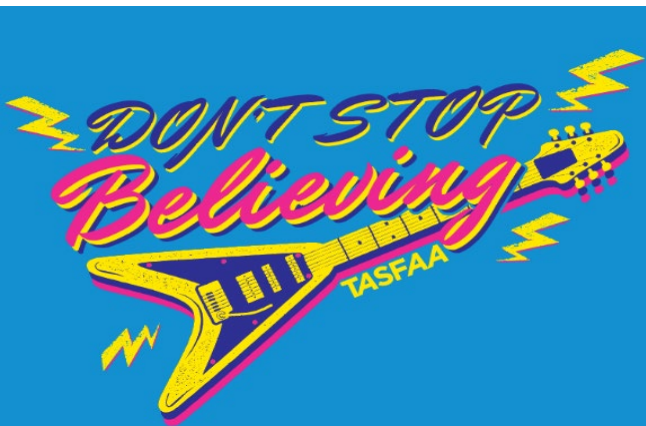


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# Withdrawal Date

- Regardless of whether a student withdraws from a program offered in modules or a program not offered in modules, the withdrawal date is still determined following the normal R2T4 requirements.

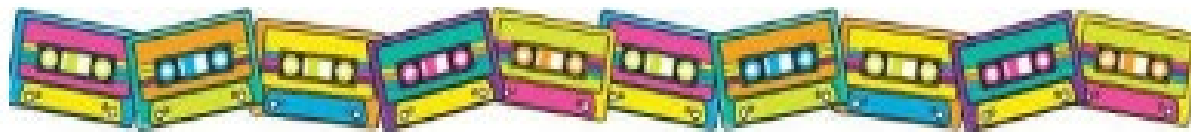
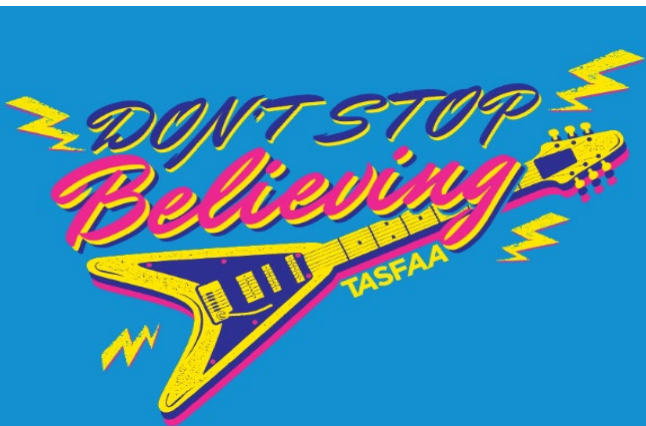


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# Recalculations

- Anytime a student begins attendance in at least one course but does not begin attendance in all the courses the student was scheduled to attend regardless of whether the student is a withdrawal, the school must determine if it is necessary to recalculate the student's eligibility for Pell Grant, TEACH Grant, and Campus-Based funds based on a revised enrollment status. **If the student is a withdrawal, this recalculation must be done before performing an R2T4 calculation, and the school must use the recalculated amounts of aid in the R2T4 calculation.**



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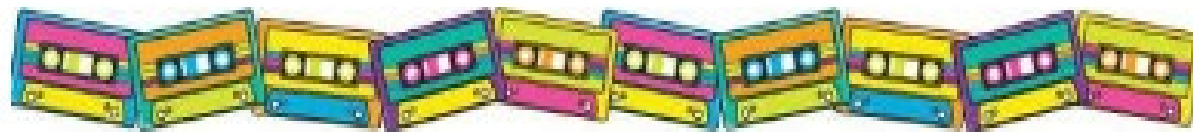


# Argos Reports

Used to determine withdrawal date and which parts of term must be included in the denominator.

## Summary Sheet for Withdrawals

| MO            |       | N ,J          |              | Term: 202210 |               |             |              |              |           |          |         |       |       |
|---------------|-------|---------------|--------------|--------------|---------------|-------------|--------------|--------------|-----------|----------|---------|-------|-------|
| Course Status | CRN   | Course        | Part of Term | Status Date  | Activity Date | Last Attend | Confirm Date | Credit Hours | Start DT  | End DT   | Meeting |       |       |
| RW            | 10235 | ACTG 3020 001 | 1            | 01/18/202    | 01/18/2022    |             | 1/26/2022    | 3            | 1/18/2022 | 5/5/2022 | MW      | 12:40 | 14:05 |
| D1            | 10235 | ACTG 3020 001 | 1            | 02/27/202    | 02/27/2022    |             | 1/26/2022    |              | 1/18/2022 | 5/5/2022 | MW      | 12:40 | 14:05 |
| RW            | 15826 | ECON 4440 D02 | A2           | 01/18/202    | 01/18/2022    |             | 3/20/2022    | 3            | 3/14/2022 | 5/5/2022 | :       | :     |       |
| RW            | 16827 | FIN 3430 001  | 1            | 01/18/202    | 01/18/2022    |             | 1/26/2022    | 3            | 1/18/2022 | 5/5/2022 | TR      | 11:20 | 12:45 |
| D1            | 16827 | FIN 3430 001  | 1            | 02/27/202    | 02/27/2022    |             | 1/26/2022    |              | 1/18/2022 | 5/5/2022 | TR      | 11:20 | 12:45 |
| RW            | 13559 | MGMT 3705 001 | 1            | 01/18/202    | 01/18/2022    |             | 1/26/2022    | 3            | 1/18/2022 | 5/5/2022 | TR      | 09:40 | 11:05 |
| D1            | 13559 | MGMT 3705 001 | 1            | 02/27/202    | 02/27/2022    |             | 1/26/2022    |              | 1/18/2022 | 5/5/2022 | TR      | 09:40 | 11:05 |



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# Argos Reports

DOD 2/22/22

3/2/2022 R2T4 Withdrawal Information 202210

MO Ya , Au

Current Enrollment Status: **WW** Withdrawal Code: **4**  
 Effective Withdrawal Date: **2/22/2022**  
 Enrollment Start Date: **1/18/2022** End Date **5/5/2022**  
 Enrollment Break Days: **8** Days in Period: **100**  
 Attendance Break Days: **0** Days Attended: **36** Percent Attended: **36**  
 Original Charges: **4766** Other Costs: Book Charge: No AERO Lab No

Comment:

|        | Standard | Repeat | In-Program |
|--------|----------|--------|------------|
| TOP    | 10       | 10     | 10         |
| MIDDLE | 0        |        | 0          |

| CRN   | COURSE        | CREDIT HOURS | PART of TERM | REG STATUS CODE | LAST ATTENDANCE DATE | ATTENDING | ATTENDANCE CONFIRM DATE | C P O S | R P T |
|-------|---------------|--------------|--------------|-----------------|----------------------|-----------|-------------------------|---------|-------|
| 10148 | ASTR 1030 001 | 3            | 1            | D1              | 2/22/2022            | Y         | 1/26/2022               | Y       | 0     |
| 11982 | ASTR 1031 004 | 1            | 1            | D1              | 2/22/2022            | Y         | 1/26/2022               | Y       | 0     |
| 16199 | HIST 2040 004 | 3            | 1            | D1              | 2/22/2022            | Y         | 1/26/2022               | Y       | 0     |
| 13159 | PHOT 3200 002 | 3            | 1            | D1              | 2/22/2022            | Y         | 1/26/2022               | Y       | 0     |
| 12478 | COMM 2200 024 | 3            | 1            | D1              | 2/22/2022            | S         | 2/3/2022                | Y       | 0     |

Aid adjusted at census due to LDA of 1/26 to 10 hours. Awarded SEOG on 2/9, ok for 10 hours. Pell reduced by \$811, TSAC by 250 will be included in letter to student regarding R2T4.

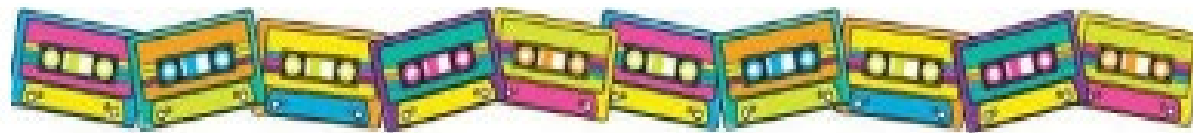
Documents how the R2T4 calculation was set up.



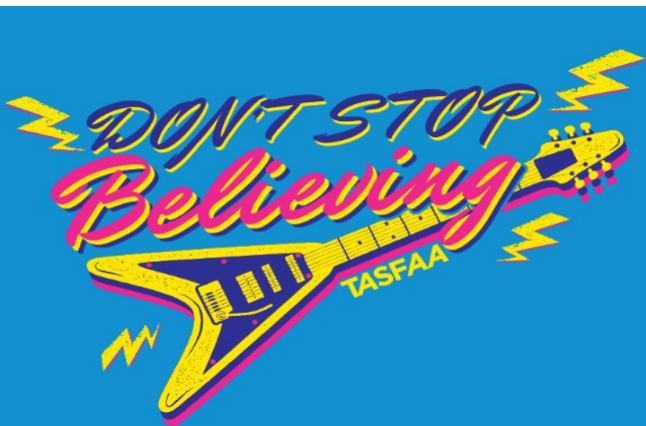
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# Q & A

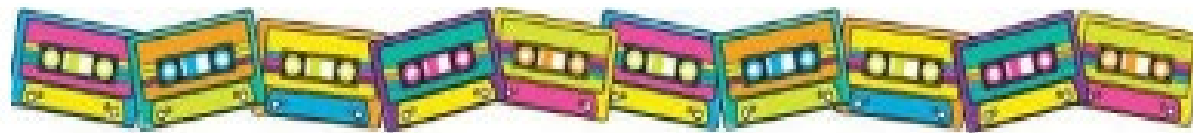


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Kelly Holder – [kelly.holder@mtsu.edu](mailto:kelly.holder@mtsu.edu)

Leann Eaton – [leann.eaton@mtsu.edu](mailto:leann.eaton@mtsu.edu)



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