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**R2T4 Regulations**  
**34 CFR 668.22**  
**Effective July 1, 2011**

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**To Whom Do They Apply?**

- Applies to students who withdraw from payment periods or periods of enrollment that begin on/after July 1, 2011.
- Does not apply to students who withdraw from a 2011 crossover payment period, even if the student received title IV, HEA program funds from the 2011-2012 award year for that crossover payment period

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### Theory Behind the Calculation

- Student earns Title IV aid through attendance
  - Percentage of aid earned is equal to the percentage of payment period or enrollment period completed

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### Program Definitions

- 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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### Credit Hour Programs Offered In 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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### Credit Hour Programs Offered In Modules

- 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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### Credit Hour Programs Offered In Modules

- Student in modular program not considered a withdrawal if
  - Provides written confirmation of intent to attend a future module in period of enrollment
    - 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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### Credit Hour Programs Offered In Modules

- Nonstandard & Nonterm 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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### Clock Hour Programs

- Student considered to be withdrawal if does not complete all clock hours and weeks of instructional time that was scheduled to complete
- 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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### 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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### 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
    - Student eligible for any Title IV funds for which eligible prior to withdrawal
- Clock hour/nonterm credit hour program
  - Withdrawn student may return to same program within 180 calendar days
    - Student eligible for any Title IV funds for which eligible prior to withdrawal

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### R2T4 Calendar Days Modular Programs

- Total calendar days include all days on 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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### 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 & Taking Attendance

- R2T4 calculates Title IV aid earned based upon student attendance
  - Aid prorated based upon days or hours student attended
- Should use best information available to determine withdrawal date since it directly impacts dollars

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### Required To Take Attendance

- School is required to take attendance if
  - Outside entity requires that attendance be taken OR
  - School has own requirement that instructors take attendance OR
  - Outside entity or school has requirement that can only be met by taking attendance or a comparable process

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### Required To Take Attendance

- If required to take attendance—
  - For some students—use attendance records for those students
  - For a limited period of time—use attendance records for withdrawals during that limited period of time
  - On a specific date—NOT considered to be required to take attendance

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### Attendance

- Attendance must be “academic attendance” or “attendance at an academically-related activity”.  
Examples include
  - Physical class attendance where there is direct interaction between instructor and student
  - Submission of an academic assignment
  - Examination, interactive tutorial, or computer-assisted instruction
  - Study group assigned by school
  - Participation in on-line discussion about academic matters
  - Initiation of contact with instructor to ask question about academic subject

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**Satisfactory Academic  
Progress Regulations  
34 CFR 668.16 & 668.34**

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**Effective Date  
July 1, 2011**

- Summer 2011 – You decide if “current” SAP or “new” SAP applies
- Must be in place for first SAP review after summer 2011
- Annual SAP review
  - Review end of Spring 2011 & use “current” policy
  - Next SAP review end of Spring 2012. Must use “new” policy

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**Satisfactory Academic  
Progress (SAP)**

- Consolidates SAP regulations
  - Administrative capability includes only requirement to establish, publish, and apply standards
- Describes all of the required elements of a satisfactory academic progress policy
- Retains institutional flexibility to set policy
- Additional flexibility allowed for institutions that monitor SAP more frequently than annual requirement

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### How Often Is SAP Evaluated?

- School must evaluate SAP at end of each payment period in programs of study that are one academic year or less in length
- For programs longer than one academic year
  - School may evaluate at end of each payment period OR annually to correspond with end of payment period
- **Student not meeting SAP standards is not eligible to receive Title IV aid**

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### For Clock Hour Programs

- Must review at end of payment period - either at the point-
  - When student's scheduled clock hours for payment period have elapsed, regardless of whether student attended hours OR
  - When student has attended the scheduled clock hours OR
  - When student successfully completes scheduled clock hours for payment period

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### Qualitative Component

- School's policy must specify grade point average, or comparable assessment, required at each evaluation
  - May be graduated or fixed
- For program of study more than two academic years, at end of second academic year
  - Must require at least "C", its equivalent, or academic standing consistent with graduation requirements

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### Quantitative Component Maximum Time Frame

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- For undergraduate programs of study, must be no longer than 150% of published length of educational program
  - For credit hour programs, as measured in credit hours
  - For clock hour programs, as measured in cumulative clock hours required to complete and expressed in calendar time
- For graduate programs of study, institution defines the maximum period based upon length of educational program

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### Quantitative Component Maximum Time Frame

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- School's policy must specify
  - **Pace of progression** required to ensure student completes within maximum time frame and that pace is measured at each evaluation
  - Pace calculated by dividing cumulative hours student successfully completed by cumulative hours student has attempted

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### Credit Hour Example

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#### Maximum Time Frame

- BA/BS that requires 120 credits for graduation
- 150% maximum time frame for 120 credits is 180 credits

#### Pace of Progression

- 120 divided by 180 is a pace of 67%.
  - Student earning 67% of credits attempted is on pace to complete the program within the maximum time frame
  - Applicable at any enrollment status

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### Clock Hour Example

#### Maximum Time Frame

- 1500 clock hours
- 30 clock hours per week
- 50 weeks of instructional time
- 150% of 50 weeks is 75 weeks

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### Maximum Time Frame

#### Special Circumstances

- Change of major
- Transfer
- Second or subsequent degree

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### SAP Policy

- School's policy must specify
  - How GPA and pace of completion affected by
    - Incompletes
    - Withdrawals
    - Repetitions

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### Repeated Coursework

- Amends definition of enrollment status to allow repeated coursework to count toward enrollment status in term-based programs
  - Removes requirement that student receive credit for repeated coursework to be aid eligible
  - Limits to one repeat of a previously passed course
  - Cannot pay to repeat a previously passed course due to failure of another course
  - Repeated credits count toward maximum time frame

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### Repeated Coursework

- Non-term credit hour and clock hour programs cannot pay for repeated hours!

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### Transfer Credits

- Transfers of credit from other schools
  - Must count transfer hours accepted toward completion of student's program as both hours attempted and hours completed

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### Transfer Example

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- 40 accepted transfer credits
- 40/40 is 100% pace of progression
- Student takes 24 credits in first year and completes 12. That's 12/24 or 50%
- Required pace of progression is 67%
- Cumulative pace is 52/64 = 81%

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### Regulatory Terms

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- **Financial Aid Warning**
  - Ineligible status
- **Appeal**
- **Financial Aid Probation**
  - Ineligible status
- **Academic Plan**
  - Eligible status

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### Financial Aid Warning

36

- **Financial Aid Warning**
  - ▶ Optional status for student not meeting SAP standards is placed on Warning for **one payment period**
  - ▶ Aid is disbursed during Warning
  - ▶ No appeal or student action necessary to place on Warning
  - ▶ **ONLY AT** school that evaluates SAP at end of each payment period

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### After Financial Aid Warning

37

- **After Warning...**
  1. Student meets SAP standards and regains aid eligibility OR
  2. Student is not meeting SAP, successfully appeals and is placed on Financial Aid Probation with/without an Academic Plan OR
  3. Student is not meeting SAP, appeals, is denied, and school provides alternative to reestablish eligibility
- ★ Cannot have 2 consecutive terms of Warning

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### SAP - APPEAL

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- Process by which a student who is not meeting institution's SAP policy petitions for reconsideration of eligibility for Title IV aid
  - Appeal policy must specify the conditions under which a student may appeal
  - Student's appeal must include
    - Why failed to make SAP and
    - What has changed that will allow the student to make SAP at the next evaluation

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### If Appeal Approved

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- You have determined that the student
  - Will be able to make SAP standards by end of next payment period
 OR
  - Will be placed on probation with an academic plan that will ensure able to meet SAP standards by specific point in time

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### SAP - Appeal

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- ★ School NOT required to have appeal process
  - ▶ If no appeal process, policy must describe how student may re-establish Title IV aid eligibility

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### Financial Aid Probation

41

- Financial Aid Probation**
- ▶ Optional status for student not meeting SAP standards who successfully appeals loss of aid eligibility
  - ▶ Aid is disbursed during Probation
  - ▶ Probation may be stand-alone term or combined with Academic Plan

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### Academic Plan

42

- Must appeal to be put on Academic Plan
- Plan may be as detailed or simple as you choose
- May be for multiple terms
- Allows student to either regain aid eligibility by meeting SAP standards or complete program of study

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### After Financial Aid Probation

43

- **After stand-alone Probation...**
  1. Student meets SAP standards and regains aid eligibility OR
  2. Student is not meeting SAP, successfully appeals again, and is placed on an Academic Plan Or
  3. Student is not meeting SAP, appeals again, is denied, and school provides alternative to reestablish eligibility OR

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### After Financial Aid Probation

- **After Probation term with Academic Plan**
  1. Student is meeting terms of Plan and becomes eligible student OR
  2. Student is not meeting Plan, successfully appeals again, and is placed on a revised Academic Plan OR
  3. Student appeals again, is denied, and school provides alternative to reestablish eligibility OR

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### Notification To Student

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- School must notify students of results of SAP evaluation that impact student's aid eligibility

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**Questions???**  
**Thank you!**

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Please provide any comments regarding  
 this training or the trainer to:  
  
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 Title IV Training Supervisor  
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