
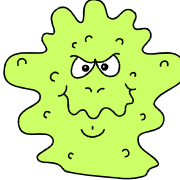


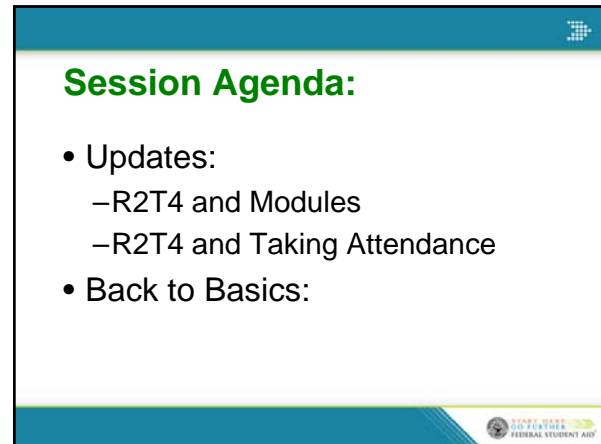
**Return of Title IV Funds**

David A. Bartlett  
U.S. Department of Education  
Kansas City, Missouri



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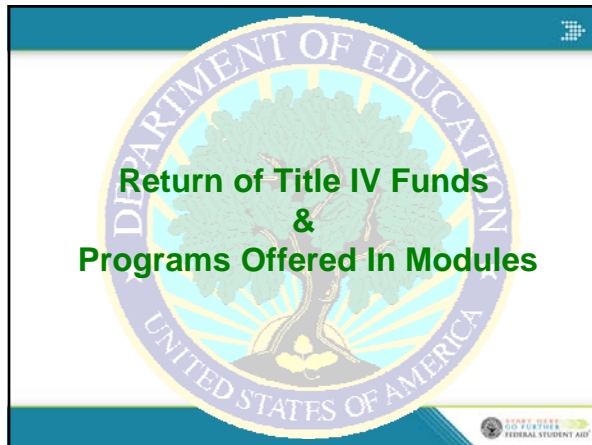
DO NOT USE DO FEATHER FEDERAL STUDENT AID



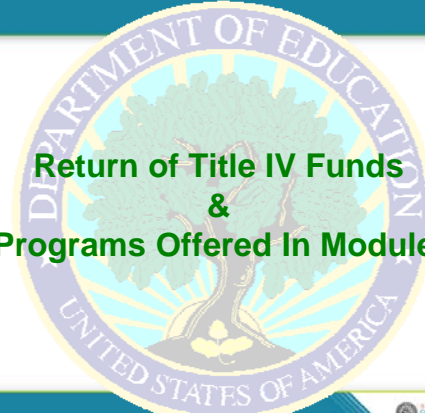
**Session Agenda:**

- Updates:
  - R2T4 and Modules
  - R2T4 and Taking Attendance
- Back to Basics:

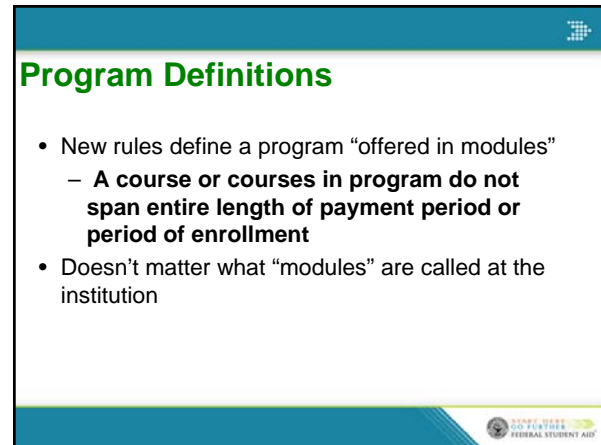
DO NOT USE DO FEATHER FEDERAL STUDENT AID



**Return of Title IV Funds  
&  
Programs Offered In Modules**



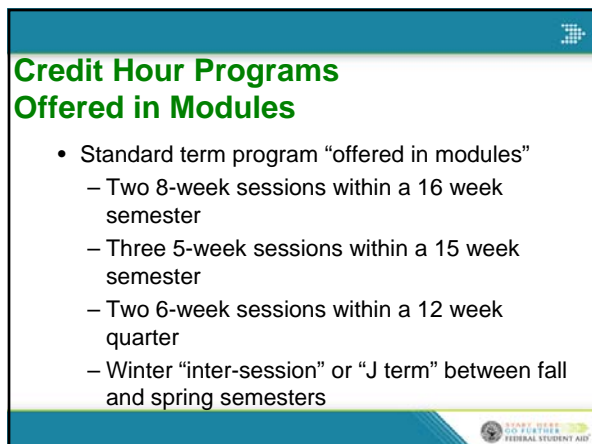
DO NOT USE DO FEATHER FEDERAL STUDENT AID



**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

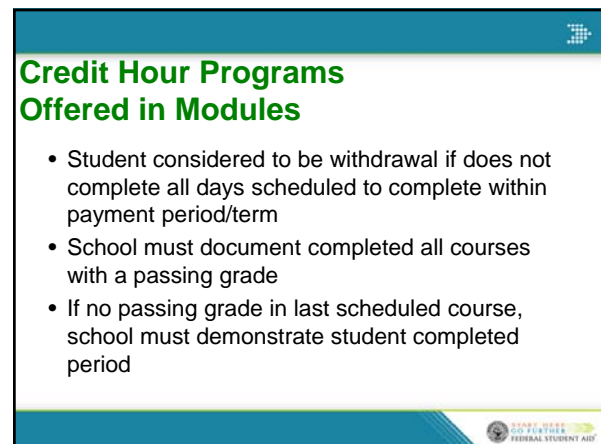
DO NOT USE DO FEATHER FEDERAL STUDENT AID



**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

DO NOT USE DO FEATHER FEDERAL STUDENT AID



**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

DO NOT USE DO FEATHER FEDERAL STUDENT AID

### R2T4 Modular Programs-Credit Hour 16 WK Semester Example

**Enrolled Example Part 1**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks
------------------	------------------	-----------------------------------	------------------

**Actual Attendance**      **R2T4 Calc required?**

Module A 4 weeks	Module B 4 weeks Withdraw	Module C 4 weeks No Enrollment	Module D 4 weeks Registered but no attendance
------------------	------------------------------	-----------------------------------	--

### R2T4 Modular Programs-Credit Hour 16 WK Semester Example

**Enrolled Example Part 2**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks
------------------	------------------	-----------------------------------	------------------

**Actual Attendance**      **R2T4 Calc required?**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks Confirmed & Completes Module D
------------------	------------------	-----------------------------------	--

Provides written Confirmation

### R2T4 Modular Programs-Credit Hour 16 WK Semester Example

**Enrolled Example Part 3**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks
------------------	------------------	-----------------------------------	------------------

**Actual Attendance**      **R2T4 Calc required? At what point? Which Module?**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks Does not show up
------------------	------------------	-----------------------------------	--------------------------------------

Provides written Confirmation

### R2T4 Modular Programs-Credit Hour 16 WK Semester Example

**Enrolled Example Part 4**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks
------------------	------------------	-----------------------------------	------------------

**Actual Attendance**      **R2T4 Calc required? At what point? Which Module?**

Module A 4 weeks	Module B 4 weeks	Module C 4 weeks No Enrollment	Module D 4 weeks Withdraws after beginning Mod D
------------------	------------------	-----------------------------------	---

Provides written Confirmation

### 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
- Future module must begin within 45 calendar days in a non-standard and non-term program

### 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

## 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

## 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

## 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

## 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

## 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



## Return of Title IV Funds & Attendance

## 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

## 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

## 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

## 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


## R2T4 Back to the Basics

## Return of Title IV Funds


- Applies only to Title IV eligible students who begin attendance and then completely withdraw, or otherwise cease attending
- If student enrolled but never attended any classes
  - Student did not establish eligibility for any funds
  - All Title IV aid disbursed must be returned to the programs

## 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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## How does it work?

- If school has disbursed more aid than the student has earned, money is returned to the programs
- If school has disbursed less aid than the student has earned, a post-withdrawal disbursement will be calculated

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## Consumer Information

School must provide to prospective and current students:

- Any refund policy with which school must comply
- School's tuition refund policy
- Requirements for treatment of Title IV funds after withdrawal
- Procedures for official withdrawal


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## Date of Institution's Determination that Student Withdrew

- When did the school know of the student's withdrawal?
- If unofficial withdrawal, determine withdrawal date no later than 30 days after the end of the earlier of the
  - Payment period or period of enrollment
  - Academic year
  - Educational program
- Schools required to take attendance should have a DOD no later than 14 calendar days after student's last date of attendance


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## Payment Period or Period of Enrollment

- Standard term-based program must use term/payment period
- Nonstandard term or nonterm program may choose either payment period or period of enrollment
  - May choose on a program-by-program basis
  - Must be consistent with application of method used


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## Payment Period or Period of Enrollment

- Nonstandard term or nonterm program
  - Use consistently for each category of students who withdraw from same program of study and
    - Attended from the beginning
    - Re-enter during period
    - Transfer into school during period

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## Rounding Rules for Dollar Amounts

- Round to the nearest penny
  - $\$2,346.00 \times 44.6\% = \$1,046.316$  or  $\$1,046.32$
  - $\$2,346.00 \times 44.4\% = \$1,041.624$  or  $\$1,041.62$
- Disbursement or refund may be rounded to the nearest dollar
  - $\$1,046.32 = \$1,046$
  - $\$1,041.62 = \$1,042$



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## Rounding Rules for Percentages

- Calculate out to 4 decimal places
  - $45 \text{ days} / 101 \text{ days} = .4455$
  - $199 \text{ hours} / 450 \text{ hours} = .4422$
- Round to third decimal place
  - $.4455 = .446 = 44.6\%$
  - $.4422 = .442 = 44.2\%$



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## Step 1 - Patrick

STEP 1: Student's Title IV Aid Information			
<b>Title IV Grant Programs</b>		Amount Disbursed	Amount that Could Have Been Disbursed
1. Pell Grant		\$1,450.00	
2. Academic Competitiveness Grant		\$375.00	
3. National SMART Grant			
4. FSEOG			
5. TEACH Grant			
		<b>A. \$1,825.00</b>	<b>C. \$0.00</b>
		Subtotal	Subtotal
<b>Title IV Loan Programs</b>		Net Amount Disbursed	Net Amount that Could Have Been Disbursed
6. Unsubsidized FFEL/Direct Stafford Loan			\$990.00
7. Subsidized FFEL/Direct Stafford Loan			\$1,732.00
8. Perkins Loan			
9. FFEL/Direct PLUS (Graduate Student)			
10. FFEL/Direct PLUS (Parent)			
		<b>B. \$0.00</b>	<b>D. \$2,722.00</b>
		Subtotal	Subtotal
		<b>E. \$1,825.00</b>	<b>F. \$1,825.00</b>
		Subtotal	Subtotal
		<b>G. \$4,547.50</b>	<b>G. \$4,547.50</b>

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## Aid That Could Have Been Disbursed

- Student met conditions for a late disbursement (668.164(g)(2)) –
- At time student withdrew, ED had processed a SAR or ISIR with official EFC
  - Pell/ACG/National SMART – ISIR with eligible EFC
  - DL – loan had been originated
  - TEACH – grant had been originated
  - Perkins/FSEOG – funds had been awarded

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## DL Second/Subsequent Disbursements

- Include as aid that could have been disbursed if student met the “conditions for a late disbursement”
- Cannot be included in any post-withdrawal disbursement [668.164(g)(4)(ii)]

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## Step 1 - Christopher

STEP 1: Student's Title IV Aid Information			
<b>Title IV Grant Programs</b>		Amount Disbursed	Amount that Could Have Been Disbursed
1. Pell Grant		\$1,450.00	
2. Academic Competitiveness Grant		\$375.00	
3. National SMART Grant			
4. FSEOG			
5. TEACH Grant			
		<b>A. \$1,825.00</b>	<b>C. \$0.00</b>
		Subtotal	Subtotal
<b>Title IV Loan Programs</b>		Net Amount Disbursed	Net Amount that Could Have Been Disbursed
6. Unsubsidized FFEL/Direct Stafford Loan			\$990.00
7. Subsidized FFEL/Direct Stafford Loan			\$1,732.00
8. Perkins Loan			
9. FFEL/Direct PLUS (Graduate Student)			
10. FFEL/Direct PLUS (Parent)			
		<b>B. \$0.00</b>	<b>D. \$2,722.00</b>
		Subtotal	Subtotal
		<b>E. \$1,825.00</b>	<b>F. \$1,825.00</b>
		Subtotal	Subtotal
		<b>G. \$4,547.50</b>	<b>G. \$4,547.50</b>

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## STEP 2: Withdrawal Date – School Not Required to Take Attendance

- Use the earlier of
  - date student began school's withdrawal process or date student otherwise provided "official" notice; **or**
  - midpoint in period (if student didn't notify school); **or**
  - If student didn't notify due to circumstances beyond student's control, the date related to that circumstance; **or**

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## STEP 2: Withdrawal Date – School Not Required to Take Attendance

- Date school determines leave began (if student didn't return from *approved* leave of absence), **or**
  - An *approved* leave of absence must meet ED's guidelines
  - Schools may have a leave of absence policy different from ED's guidelines
  - Students approved for leave under a policy that doesn't meet ED's guidelines are considered "withdrawn" and an R2T4 must be calculated

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## Approved Leave of Absence Policy - Optional

- Written policy, publicized to students
- Student followed school's policy and was approved
- The leave does not involve additional charges
- Student allowed to complete coursework begun prior to leave
- LOA may not include more than 180 days in any 12-month period

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## STEP 2: Withdrawal Date – School Not Required to Take Attendance

- School not required to take attendance always has the option of using the date of student's last attendance at an academically related activity as documented by the school

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## STEP 2: Withdrawal Date – School Required to Take Attendance

IF... school is required to take attendance by outside entity (or your institution has instituted such a requirement after 7/1/11) (such as state or accrediting agency)

THEN... withdrawal date is taken from attendance records

NOTE: Requirement might apply only to specific groups of students

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## Calendar Days at Credit-Hour Schools

Count every day, including weekends and holidays, except:

- Scheduled break of five or more consecutive days when no classes are offered
- Days of leave of absence are not included in total days

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## Step 2 – Credit Hour

**STEP 2: Percentage of Title IV Aid Earned**

Start date:  Scheduled end date:  Date of withdrawal:

A school that is not required to take attendance may, for a student who withdraws without notification, enter 50% in Box H and proceed to Step 3. Or, the school may enter the last date of attendance at an academically related activity for the "withdrawal date," and proceed with the calculation as instructed. For a student who officially withdraws, enter the withdrawal date.

**H. Percentage of payment period or period of enrollment completed**  
 Divide the calendar days completed in the period by the total calendar days in the period (excluding scheduled breaks of five days or more AND days that the student was on an approved leave of absence).

÷  =

Completed days: 42 Total days: 108

▶ If this percentage is greater than 60%, enter 100% in Box H and proceed to Step 3.  
 ▶ If this percentage is less than or equal to 60%, enter that percentage in Box H, and proceed to Step 3.

**H. 38.9 %**

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## Clock Hours

- Numerator is clock hours scheduled to be completed as of the student's last date of attendance
  - Scheduled hours per day times number of days of scheduled class from first day of payment period/period of enrollment to last date of attendance
- Denominator is clock hours scheduled to be completed in the payment period/period of enrollment

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## Step 2 - Clock Hour

**STEP 2: Percentage of Title IV Aid Earned**

Withdrawal date:

**H. Determine the percentage of the period completed:**  
 Divide the clock hours scheduled to have been completed as of the withdrawal date in the period by the total clock hours in the period.

÷  =

Hours scheduled to complete: 175 Total hours in period: 450

▶ If this percentage is greater than 60%, enter 100% in Box H and proceed to Step 3.  
 ▶ If this percentage is less than or equal to 60%, enter that percentage in Box H, and proceed to Step 3.

**H. 38.9 %**

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## Step 3

**STEP 3: Amount of Title IV Aid Earned by the Student**

Multiply the percentage of Title IV aid earned (Box H) by the Total Title IV aid disbursed and that could have been disbursed for the period (Box G).

×  = **L. \$1,768.98**

Box H Box G

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## Step 4

**STEP 4: Title IV Aid to be Disbursed or Returned**

▶ If the amount in Box J is greater than the amount in Box E, go to Post-withdrawal disbursement (Item J).  
 ▶ If the amount in Box J is less than the amount in Box E, go to Title IV aid to be returned (Item K).  
 ▶ If the amounts in Box J and Box E are equal, STOP. No further action is necessary.

**J. Post-withdrawal disbursement**  
 From the Amount of Title IV aid earned by the student (Box I) subtract the Total Title IV aid disbursed for the period (Box E). This is the amount of the post-withdrawal disbursement.  
 Stop here, and enter the amount in Box 1 on Page 3 (Post-withdrawal disbursement tracking sheet).

-  = **J.**

**K. Title IV aid to be returned**  
 From the Total Title IV aid disbursed for the period (Box E) subtract the Amount of Title IV aid earned by the student (Box I). This is the amount of Title IV aid that must be returned.

-  = **K. \$56.02**

**STEP 4: Aid to be Disbursed or Returned CONTINUED**

**K. Title IV aid to be returned**  
 From the Total Title IV aid disbursed for the period (Box E) subtract the amount of Title IV aid earned by the student (Box I). This is the amount of Title IV aid that must be returned.

-  = **K. \$56.02**

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## Step 5

**STEP 5: Amount of Unearned Title IV Aid Due from the School**

**L. Institutional charges for the period**

Tuition	\$7,400.00
Room	\$0.00
Board	\$2.00
Other	
Other	
<b>Total Institutional Charges (Add all the charges together)</b>	<b>L. \$7,500.00</b>

**M. Percentage of unearned Title IV aid**  
 100% -  = **M. 61.1 %**

**N. Amount of unearned charges**  
 Multiply Institutional charges for the period (Box L) by the percentage of unearned Title IV aid (Box M).

×  = **N. \$4,582.50**

**O. Amount for school to return**  
 Compare the amount of Title IV aid to be returned (Box K) to amount of unearned charges (Box N), and enter the lesser amount.

**O. \$56.02**

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### Step 6: Return of Funds by School

- Law specifies order of Title IV programs to which funds must be returned
  - See worksheet
- Never return more money than was received from a Title IV program

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### Step 6: Return of Funds by School

- Return funds to program(s) as soon as possible, but no later than 45 calendar days after the date of determination of withdrawal
  - Calculation must be completed within 30 calendar days of the date of determination of withdrawal

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### Step 6

STEP 6: Return of Funds by the School	
The school must return the unearned aid for which the school is responsible (Box O) by repaying funds to the following sources, in order, up to the total net amount disbursed from each source.	
Title IV Programs	
1. Unsubsidized FFEL/Direct Stafford Loan	Amount for School to Return
2. Subsidized FFEL/Direct Stafford Loan	
3. Perkins Loan	
4. FFEL/Direct PLUS (Graduate Student)	
5. FFEL/Direct PLUS (Parent)	
<b>Total loans the school must return</b>	<b>P. \$0.00</b>
6. Pell Grant	\$56.02
7. Academic Competitiveness Grant	
8. National SMART Grant	
9. FSEOG	
10. TEACH Grant	

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### Step 7

STEP 7: Initial Amount of Unearned Title IV Aid Due from the Student	
From the amount of Title IV aid to be returned (Box K) subtract the Amount for the school to return (Box O).	
Box K: \$56.02	Box O: \$56.02
= Q. \$0.00	
▶ If Box Q is ≤ zero, STOP. If greater than zero, go to Step 8.	

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### Step 8: Repayment of Student's Loans

- Student is responsible to repay any loan funds not returned by the school
- Loans are repaid in accordance with terms of the promissory note

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### Step 8

STEP 8: Repayment of the Student's loans	
From the Net loans disbursed to the student (Box B) subtract the Total loans the school must return (Box P) to find the amount of Title IV loans the student is still responsible for repaying (Box R).	
These outstanding loans consist either of loan funds the student has earned, or unearned loan funds that the school is not responsible for repaying, or both; and they are repaid to the loan holders according to the terms of the borrower's promissory note.	
Box B: \$0.00	Box P: \$0.00
= R.	
▶ If Box Q is less than or equal to Box R, STOP. The only action a school must take is to notify the holders of the loans of the student's withdrawal date.	
▶ If Box Q is greater than Box R, proceed to Step 9.	

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## Step 9

**STEP 9: Grant Funds to be Returned**

**S. Initial amount of Title IV grants for student to return**  
 From the initial amount of unearned Title IV aid due from the student (Box Q) subtract the amount of loans to be repaid by the student (Box R).

Box Q      Box R      = **S.**

**T. Amount of Title IV grant protection**  
 Multiply the total of Title IV grant aid that was disbursed and that could have been disbursed for the period (Box F) by 50%.

Box F      x 50%      = **T.**

**U. Title IV grant funds for student to return**  
 From the Initial amount of Title IV grants for student to return (Box S) subtract the Amount of Title IV grant protection (Box T).

Box S      Box T      = **U.**

▶ If Box U is less than or equal to zero, **STOP**. If not, go to Step 10.

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## Step 10: Return of Funds by Student

- Any grant repayment due from student is considered an overpayment
- Student is responsible for repayment
  - Amounts of \$50 or less in any program are set aside
- Law specifies order of Title IV programs to which funds must be returned
  - See worksheet

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## Step 10

**STEP 10: Return of Grant Funds by the Student**

Except as noted below, the student must return the unearned grant funds for which he or she is responsible (Box U). The grant funds returned by the student are applied to the following sources in the order indicated, up to the total amount disbursed from that grant program minus any grant funds the school is responsible for returning to that program in Step 6.

**Note that the student is not responsible for returning funds to any program to which the student owes \$50.00 or less.**

Title IV Grant Programs	Amount To Return
1. Pell Grant	.....
2. Academic Competitiveness Grant	.....
3. National SMART Grant	.....
4. FSEOG	.....
5. TEACH Grant	.....

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## Step 9 – Calculating Grant Overpayment - Example

**STEP 9: Grant Funds to be Returned**

**S. Initial amount of Title IV grants for student to return**  
 Subtract the amount of loans to be repaid by the student (Box R) from the initial amount of unearned Title IV aid due from the student (Box Q).

Box Q      Box R      = **S.** \$ 900.00

\$900.00      -      \$0.00      =      **S.** \$ 900.00

**T. Amount of Title IV grant protection**  
 Multiply the total of Title IV grant aid that was disbursed and could have been disbursed for the payment period or period of enrollment (Box F) by 50%.

Box F      x 50%      = **T.** \$ 1,390.00

\$2780.00      x      50%      =      **T.** \$ 1,390.00

**U. Title IV grant funds for student to return**  
 Subtract the protected amount of Title IV grants (Box T) from the initial amount of Title IV grants for student to return (Box S).

Box S      Box T      = **U.** \$ <\$490.00>

\$900.00      -      \$1390.00      =      **U.** \$ <\$490.00>

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## Grant Overpayment

- School must notify student within 30 days of school's determination of withdrawal
- Student retains Title IV eligibility for 45 days
  - During that time, he must either:
    - Repay in full to school
    - Make satisfactory arrangements to repay with school (school's option)
    - Make satisfactory arrangements to repay with Department of Education

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## Referring Overpayment to the Department

- If student does not repay in full or make payment arrangements with school within 45 days, school must refer overpayment to Department for collection
- Referral form in Participant Guide
  - Further explanation in FSA Handbook, Volume 5

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## Report Overpayment to NSLDS

- Overpayments not paid in full within 45 days of the institution's determination of the withdrawal must be reported to NSLDS
  - Reported via online process

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## Post-Withdrawal Disbursements (PWD)

- When Title IV aid disbursed is less than Title IV aid earned
- Sample worksheet in FSA Handbook and in Participant Guide
- Box J on R2T4 Worksheet

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## Notification of PWD

- School must provide written notification within 30 days of date of determination of withdrawal
  - Must identify type and amount of funds
  - Must explain option to accept or decline some or all of funds
  - Must explain obligation to repay any loan funds disbursed
  - Must provide a deadline for response

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## Post-Withdrawal Disbursement of Grant Funds

- No student confirmation required
- Disbursed directly to student - as soon as possible, but no later than 45 calendar days after date of determination
- Disbursed as credit to account – within 180 days after date of determination

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## Post-Withdrawal Disbursement of Loan Funds

- Must receive confirmation from the student or parent borrower prior to disbursement
- Must be made as soon as possible, but no later than 180 days after date of determination

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## Applying PWD to Institutional Charges

- Grant funds may be applied directly to those charges without student's authorization
- Loan funds may only be applied after confirmation is received from the student/parent borrower
  - Written notification procedures are same as for direct disbursement


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## Additional Resources

- Dear Colleague Letter GEN-00-24 (December 2000)
- Dear Colleague Letter GEN-04-03 (November 2004)
- R2T4 Demo Site available at  
– <http://fafsademo.test.ed.gov>
- R2T4 website available through FAA Access to CPS Online  
– <http://www.faaaccess.ed.gov/>


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## QUESTIONS???

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