## R2T4 ESSENTIALS

Pam Gilligan | Training Officer U.S. Department of Education

PASFAA Fall Conference October 2021





### **AGENDA**

- **01** Basic Principles
- **02** When R2T4 Does Not Apply
- **02** Definitions and Ground Rules for R2T4
- How R2T4 Calculation Works
- **Q4** Returning Funds & Post-Withdrawal Disbursements
- Other Considerations for the Calculation
- **16** Recent Regulatory Updates
- **07** Resources



## BASIC PRINCIPLES



### **BASIC PRINCIPLES**

- Title IV aid awarded assuming student will attend school for the entire period for which funds are awarded
- When student ceases attendance before planned end date, student may not be eligible for full amount of Title IV scheduled to receive
- If disburse *more* Title IV aid than student earned, unearned aid must be returned to ED
- If disburse less Title IV aid than student earned, post-withdrawal disbursement (PWD) will be calculated and must be offered



### **BASIC PRINCIPLES**

- Students earn Title IV aid according to percentage of—
  - Period student completed on withdrawal date (credit-hour programs)
  - Period student was scheduled to complete on withdrawal date (clock-hour programs)
- If student completes (or is scheduled to complete) *more than 60%* of period, student has earned 100% of Title IV funds
- Institutional or other refund policies (State, accrediting agency) do not impact amount of Title IV aid earned in R2T4 calculation
- Schools should use best information available to determine withdrawal date



### **CONSUMER INFORMATION**

- Any refund policy with which the school must comply, as specified by the State/accrediting agency
- Requirements for the treatment of Title IV funds after withdrawal
- Requirements and procedures for officially withdrawing from the school
  - Includes stating the administrative offices that handle the official withdrawal process for your campus



## WHEN R2T4 DOES NOT APPLY



### FAILURE TO BEGIN ATTENDANCE

If cannot document student began attendance for the period:

- Student ineligible for Title IV aid for that period
- R2T4 does not apply
- School must return:
  - All Federal Pell Grant, FSEOG, Iraq & Afghanistan Service Grant, and TEACH Grant funds
  - Direct Loan (DL) funds credited to student's account
  - For DL funds disbursed directly to student, school may:
    - Choose to return funds itself
    - Notify Direct Loan servicer so student can immediately repay



### PARTIAL WITHDRAWALS & COMPLETERS

### R2T4 requirements *do not* apply if student:

- Withdraws from some, but not all coursework (e.g., drops one of four classes during semester)
- Completes period by receiving a passing grade at end of last class student was scheduled to attend



### **COMPLETERS THAT EARN FAILING GRADES**

May consider student to have completed period with a failing grade (and avoid R2T4 calculation), but only if:

 Grading policy differentiates between completing a course and failing to meet course objectives ("F") vs. failing to complete course ("W"); and

Student receives grade that denotes course completion



# DEFINITIONS AND GROUND RULES FOR R2T4



### **DEFINITIONS AND GROUND RULES FOR R2T4**

#### Withdrawal Date

Date student ceased attendance at institution

#### Date of Determination (DOD)

Date institution determined that student ceased attendance



### **DEFINITIONS AND GROUND RULES FOR R2T4**

#### Rounding Rules: Dollar Amounts and Percentages



Calculation - round to nearest penny

- \$2,346.00 x 44.6% = \$1,046.316 or \$1,046.32
- \$2,346.00 x 44.4% = \$1,041.624 or \$1,041.62



Disbursement or refund may be rounded to nearest dollar

- \$1,046.32 = \$1,046
- \$1,041.62 = \$1,042 <sup>1</sup>



Calculate out to 4 decimal places

- 45 days / 101 days = .4455
- 199 hours / 450 hours = .4422



Round to third decimal place

- .4455 = .446 = 44.6%
- .4422 = .442 = 44.2%



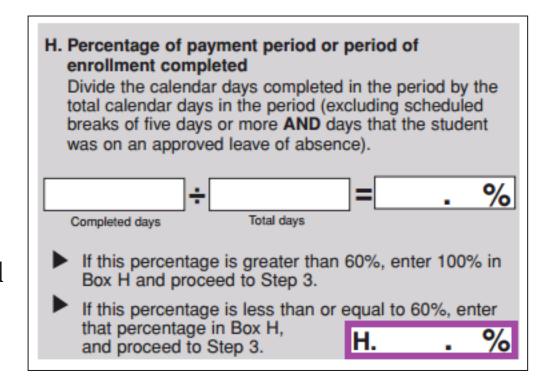
**Step One:** Determine amount of Title IV aid school *disbursed or could have disbursed to* student at time of withdrawal.

STEP 1: Student's Title IV Aid Information					
Title IV Grant Programs	Amount Disbursed	Amount that Could Have Been Disbursed	E.	Total Title IV aid disbursed for the period.	
1. Pell Grant			1	A.	
2. FSEOG				+ B.	
3. TEACH Grant				E. S	
4. Iraq and Afghanistan Service Grant			]_		
			h	Total Title IV grant aid disbursed and that could have been disbursed for the	
				period.	
A.		C.		Α.	
	Subtotal	Subtotal	_	+ <u>C.</u>	
To 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Net Amount Disbursed	Not Amount that Could	=	F. \$ .	
Title IV Loan Programs	THAT ATTOURT DISDUISAGE	Have Been Disbursed	- G.	Total Title IV aid disbursed and that could	
5. Unsubsidized Direct Loan			_	have been disbursed for the period.	
6. Subsidized Direct Loan					
7. Direct Grad PLUS Loan				A.	
8. Direct Parent PLUS Loan				B.	
				+ D	
B.		D.	1	T	
В.	Subtotal	Subtotal Subtotal	J =	G.\$ .	

**Step Two:** Calculate percentage of period completed. If **greater than 60%**, student earned 100% for period.

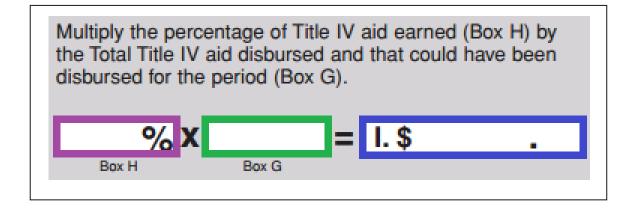
<u>Numerator</u>: Number of days completed in period (for credit-hour programs); or hours scheduled to complete at time of withdrawal (for clock-hour programs)

<u>Denominator</u>: Total number of days in period (for credit-hour programs); or total hours scheduled for period (for clock-hour programs)



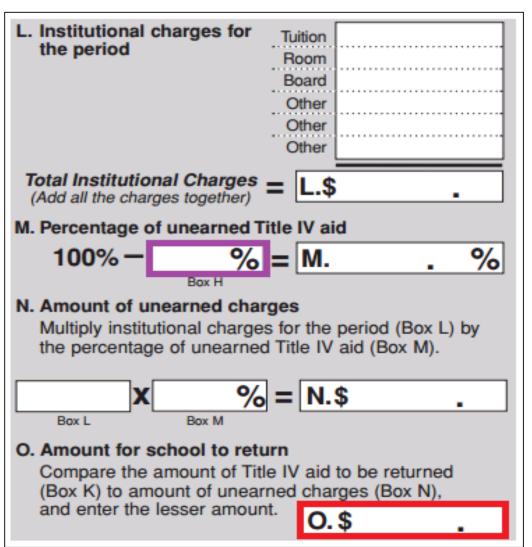
**Steps Three and Four:** Multiply percentage completed (or scheduled to complete) by total Title IV aid disbursed or could have been disbursed.

- If amount earned is less than amount disbursed, return to ED is required
- If the amount earned is *greater* than amount disbursed, PWD is required



**Step Five:** If return required, determine how much school must return.

- Add all institutional charges incurred by withdrawal date
- Multiply that total by percentage of period student <u>did not</u> complete





**Step Six:** School returns funds to ED per statutory order (*i.e.*, loans, then grants).

STEP 6: Return of Funds by the	School
The school must return the unearned aid for responsible (Box O) by repaying funds to the up to the total net amount disbursed from ea	following sources, in order,
Title IV Programs	Amount for School to Return
Unsubsidized Direct Loan     Subsidized Direct Loan	
Direct Grad PLUS Loan     Direct Parent PLUS Loan	
Total loans the school = must return	2.\$
5. Pell Grant	
6. Iraq and Afghanistan Service Grant 7. FSEOG	
8. TEACH Grant	
••••••	



**Steps Seven through Ten:** Determine amount to be returned by student.

- Student must repay:
  - Remaining unearned Title IV loan funds according to terms of promissory note. No further action required by institution
  - Grant overpayments (remaining unearned Title IV grant funds greater than 50% of total grant assistance disbursed for period)
    - School must notify student within 30 days of DOD of obligation to repay
    - Student must return grant funds in statutory order



# RETURNING FUNDS AND PWD



### RETURNS BY THE SCHOOL

- School must return Title IV funds it has responsibility to return as soon as possible, but no later than 45 days after the Date of Determination (DOD)
- Return is completed on date institution:
  - Deposits or transfers funds into school's federal funds bank account, and then awards and disburses the funds to another eligible student; or
  - Returns funds to ED electronically using "Refund" function in G5



# RETURNS BY THE STUDENT (GRANT OVERPAYMENTS)

- School must notify student within 30 days of DOD of obligation to repay or make satisfactory payment arrangements for grant overpayment
- Students retain Title IV eligibility for 45 days from date school sends student notice of overpayment
- Students can extend eligibility beyond 45 days by paying in full or signing repayment agreement with school or ED



# RETURNS BY THE STUDENT (GRANT OVERPAYMENTS)

- Not required to repay grant overpayment of \$50.00 or less resulting from withdrawal
- May resolve grant overpayment through:
  - Full and immediate repayment to institution,
  - Repayment arrangements satisfactory to school, or
  - Overpayment collection procedures negotiated with ED's Default Resolution Group
- Must return Title IV grant overpayment in statutory order



- Must meet late disbursement requirements in 668.164(j)
- Must be made from grant funds before loan funds
- May be used to pay for:
  - Tuition/fees
  - Room and board (if contracted with institution)
  - Other charges (with written authorization)



#### Criteria for PWD of **Title IV grant funds**

- Must have valid SAR/ISIR by deadline established by ED
- Disburse direct to student as soon as possible but within 45 days of DOD
- Disburse to student account within 180 days of DOD



Criteria for PWD of **Title IV loan funds** 

- Must offer to student (or parent for PLUS loan) within 30 days of DOD
  - Must request confirmation of acceptance
- Must disburse within 180 days of DOD



#### Notifications for **Title IV loan** PWD

- Must notify borrower within 30 days DOD and explain right to decline all or portion of loan disbursement
- Must explain obligation to repay loan
- Must request confirmation before crediting account or disbursing directly to borrower
- Must specify deadline of at least 14 days for required response/confirmation
  - If borrower responds late, school decides whether to disburse
    - If decide not to disburse, must notify borrower in writing
  - If no response from borrower, school cannot make PWD



# OTHER CONSIDERATIONS FOR THE CALCULATION



### AID THAT COULD HAVE BEEN DISBURSED

Include aid that *could have been disbursed* if late disbursement conditions met prior to withdrawal (see 34 CFR 668.164(j)(2))

- All Title IV ED processed ISIR/SAR with an official EFC
- TEACH Grant/Direct Loan School originated grant/loan
- Perkins/FSEOG School made award



### AID THAT COULD HAVE BEEN DISBURSED

#### **Origination:**

- Direct Loans and TEACH Grants "originated" on date school creates electronic origination record in its system
  - Not necessarily date information transmitted to Common Origination and Disbursement (COD) System



### AID THAT COULD HAVE BEEN DISBURSED

#### **Example:**

First-time, first-year borrower starts class on 9/1 and withdraws on 9/28. School originates \$1,000 Direct Loan but does not disburse due to 30-day delay rule.

• School includes \$1,000 loan as "aid that could have been disbursed" on R2T4 calculation. Correct? Yes/No?

**YES.** Aid can be included as could have been disbursed since met late disbursement rules. However, the student cannot receive a Post-Withdrawal Disbursement since the student did not meet the 30-day delay requirement.



# AID THAT COULD HAVE BEEN DISBURSED (NOT)

PWDs for "aid that could have been disbursed" *cannot* be made for

- Second or subsequent disbursements of Direct Loans (DLs)
- First disbursements of DL to students in modular program who withdrew before establishing half-time enrollment status
- Disbursements of DL to first-year, first-time DL borrowers who did not complete first 30 days



### **INADVERTENT OVERPAYMENTS**

- When school disburses Title IV aid to student no longer in attendance
  - Include as "aid that could have been disbursed"
- School must return inadvertent overpayments within 45 days of DOD unless student is eligible for PWD

### **INADVERTENT OVERPAYMENTS**

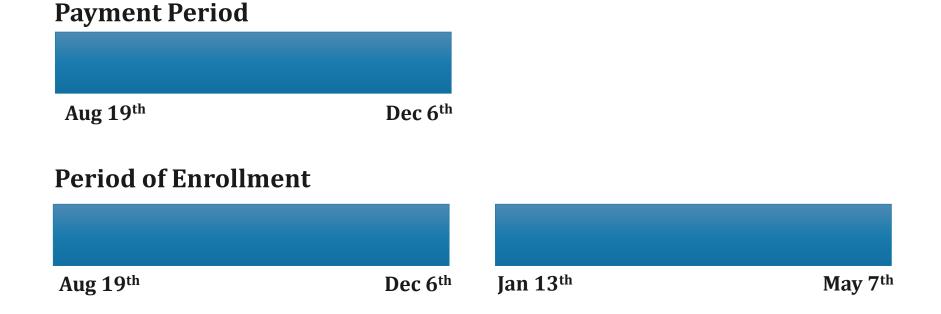
#### **Example:**

- Student initiates official withdrawal at Registrar's office on **Friday** and receives form requiring financial aid office and Bursar signatures
- School disburses DL funds to student's account on Monday
- Student obtains required signatures and is officially withdrawn on Tuesday
- School includes DL disbursement as "aid that could have been disbursed" in student's R2T4 calculation



# PAYMENT PERIOD OR PERIOD OF ENROLLMENT

- Standard term programs: Must use payment period (PP)
- Non-term and nonstandard term programs: May use PP or period of enrollment (POE)
  - Must use consistently for all students in program

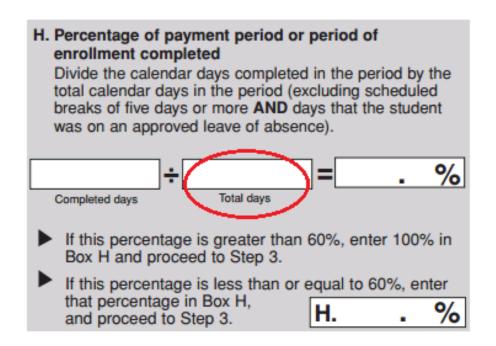




# PAYMENT PERIOD OR PERIOD OF ENROLLMENT (CREDIT-HOUR PROGRAMS)

Total days in PP or POE is denominator for credit hour R2T4 calculation

- "Total days" excludes:
  - Scheduled breaks of five days or more
  - Leaves of absence
  - Periods when student not enrolled in any modules





## PAYMENT PERIOD OR PERIOD OF ENROLLMENT

#### **Example:**

School has vacation break from Wednesday, November 25 to Friday, November 27. It does not offer weekend classes.

Should break be excluded from R2T4? Yes/No?

November									
Sun	Mon	Tue	Wed	Thu	Fri	Sat			
22	23	24	25	26	27	28			
29	30								



## PAYMENT PERIOD OR PERIOD OF ENROLLMENT

#### **Answer:**

**Yes.** Five (5) days from Wednesday, November 25 to **Sunday, November 29** are excluded from R2T4 calculation.

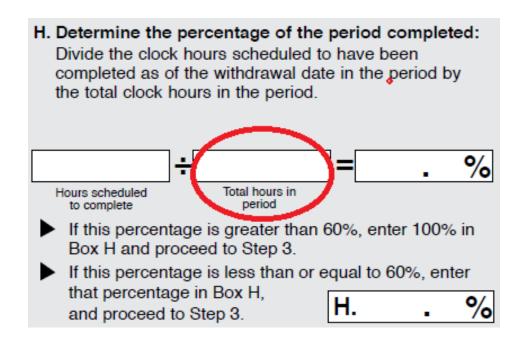
November									
Sun	Mon	Tue	Wed	Thu	Fri	Sat			
22	23	24	25	26	27	28			
29	30								



# PAYMENT PERIOD OR PERIOD OF ENROLLMENT (CLOCK-HOUR PROGRAMS)

*Total scheduled hours in PP or POE* is denominator for clock-hour R2T4 calculation.

- Must be hours established per accrediting agency requirements
- Do not count scheduled hours for
  - Periods when student is on leave of absence
  - "Make-up" hours not part of student's normal schedule





## **LEAVE OF ABSENCE (LOA)**

Temporary interruption in program of study (instead of withdrawal)

#### **Conditions for Approved LOA**

- 1. Formal written policy
- 2. Student follows formal policy in requesting LOA
- 3. Reasonable expectation student will return from LOA
- 4. School approves LOA in accordance with its policy

- 5. Student not assessed additional institutional charges
- 6. Number of days on approved LOA cannot exceed 180 days within 12-month period
- 7. Loan recipients must be told of effects on grace period if they do not return



## **LEAVE OF ABSENCE (LOA)**

#### Standard term or nonstandard term programs:

Must resume training at same point student began LOA

#### <u>Clock-hour and non-term, credit-hour programs</u>:

Not required to resume training at same point student began LOA

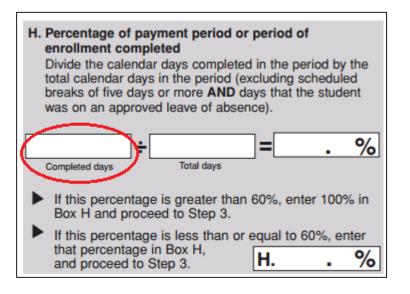
If LOA fails to meet regulatory requirements, student must be considered withdrawn as of beginning of LOA



#### WITHDRAWAL DATE AND AMOUNT COMPLETED

Withdrawal date determines "percent completed"; affects numerator in R2T4 calculation

 <u>Credit-hour programs</u>: Exclude scheduled breaks of 5+ days, LOAs, and periods student not enrolled in any modules from "completed days"





#### HOW TO DETERMINE WITHDRAWAL DATE

Depends on whether school is

- Required to take attendance
  - All clock-hour programs "required to take attendance"
- NOT required to take attendance





## REQUIRED TO TAKE ATTENDANCE?

School is "required to take attendance" if

- Outside entity requires it
- School has its own requirement that instructors take attendance
- Outside entity or school has requirement that can only be met by taking attendance



## REQUIRED TO TAKE ATTENDANCE?

School may be "required to take attendance" for *subsets of students* or *short periods of time* 

<u>Example</u>: Outside agency provides scholarship for 10 students and attendance is required. If scholarship recipient withdraws, "required to take attendance" rules apply. (Subset)

<u>Example</u>: State requires continuous attendance taking for first 10 days of class for a State grant. If recipient withdraws within first 10 days, "required to take attendance" rules apply. (Short period of time)



## REQUIRED TO TAKE ATTENDANCE?

- Census date does NOT mean "required to take attendance"
  - May have up to one census date per module and still NOT "required to take attendance" for programs offered in modules

Must use official attendance records for withdrawal date





## **SCHOOLS NOT REQUIRED TO TAKE ATTENDANCE**

You are *not required* to take attendance if school does not fall into one of categories for institutions that are required to take attendance

- Applies to most schools
- Have more options for determining when student has withdrawn





## **SCHOOLS <u>NOT</u> REQUIRED TO TAKE ATTENDANCE**

Options for determining official withdrawal date (non-attendance taking):

- Earlier of –
- Date student began official withdrawal process or date student otherwise provided official notification of intent to withdraw
- Date related to accident, grievous personal loss, or other such circumstances beyond the student's control, if prevented student from officially withdrawing



## SCHOOLS <u>NOT</u> REQUIRED TO TAKE ATTENDANCE

Option for determining withdrawal date for unofficial withdrawals (non-attendance taking)

- Date student began LOA (if does not return or LOA not valid)
- Midpoint of period (if no notice; aka "unofficial withdrawal")

Last date of attendance or academically-related activity (option characteristics)
 Calendar



## DATE OF DETERMINATION (DOD)

DOD for schools required to take attendance

- Date student provides notification s/he is ceasing attendance
- No later than 14 days after LDA if no notification (except in unusual circumstances)
  - Not required to administratively withdraw student after 14 days
  - 14th day begins timeframe for R2T4 calculations/returns





#### DEADLINES RELATED TO DATE OF DETERMINATION

#### Within **30** days:

- Perform R2T4 calculation
- Notify student of any grant overpayment
- Notify student of eligibility for PWD of Direct Loan funds

#### Within 45 days:

- Return Title IV funds school has responsibility for
- Make PWD of grant funds directly to student

#### Within **180** days:

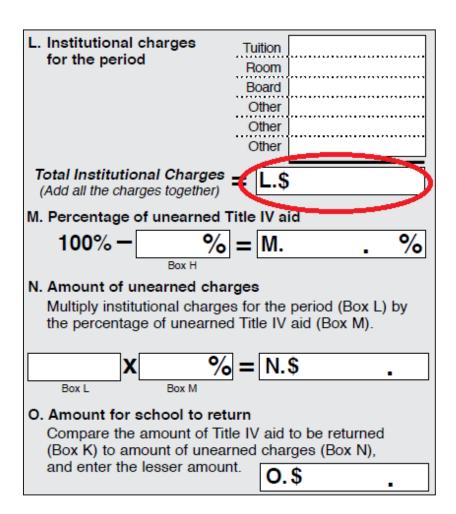
- Make PWD of grant funds to student's account
- Make any PWD of Direct Loan funds



#### INSTITUTIONAL CHARGES

#### Total institutional charges

- Includes charges initially assessed for period or adjusted prior to withdrawal
- Must be prorated if charges are assessed for period longer than period used for R2T4 purposes





#### INSTITUTIONAL V. NON-INSTITUTIONAL CHARGES

#### **Institutional Charges:**

- All charges for tuition, fees, and room and board (if contracted with school)
- Expenses for required course materials (books, kits, tools, supplies, etc.) if no real and reasonable opportunity to purchase elsewhere

#### **Non-Institutional Charges:**

- Charges for required course materials if student had a real and reasonable opportunity to purchase elsewhere
- Charges for group health insurance fees if required for all students, and coverage extends after withdrawal
- Charges to student's account for discretionary, educationally-related expenses (e.g., parking or library fines, etc.)



#### INSTITUTIONAL V. NON-INSTITUTIONAL CHARGES

Costs schools may exclude from institutional charges

- Unreturnable equipment
- Returnable equipment not returned in good condition within 20 days of withdrawal
- May only exclude amount *school* paid for materials (not amount charged to

students)



## RECENT REGULATORY UPDATES



#### R2T4 - ACADEMIC ATTENDANCE

- Definition of "academic attendance" and "attendance at an academically related activity"
- 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





#### 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
- Students in subscription-based and non-term programs are considered withdrawn if unable to resume attendance within a payment period or period of enrollment for more than 60 days after ceasing attendance, unless the student is on approved leave of absence



#### **R2T4 – WRITTEN CONFIRMATION**

- 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 subscription-based 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 occurs within the same payment period or period of enrollment and is no later
      than 60 calendar days after the student ceased attendance



#### **R2T4 – WRITTEN CONFIRMATION**

- Written confirmation continued...
  - 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 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



#### **R2T4 – WRITTEN CONFIRMATION**

- Written confirmation continued...
  - A student may change the date of return that begins later in the same payment period or period of enrollment, provided that the student does so in writing prior to the return date that he or she had previously confirmed
    - For standard and nonstandard term programs, excluding subscription-based programs the later module that he or she will attend begins no later than 45 calendar days after the end of the module the student ceased attending; and
    - For non-term and subscription-based programs, the student's program permits the student to resume attendance no later than 60 calendar days after the student ceased attendance



#### **R2T4 – WITHDRAWAL EXEMPTIONS**

- 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)





#### R2T4 - REMINDER

- Withdrawal exemptions 34 CFR 668.22(a)
  - The requirements for a withdrawal exemption (49%, half-time completion, etc.) are used solely to determine if a student is considered withdrawn for R2T4 purposes
  - If a student does not meet the withdrawal exemptions and is considered withdrawn, all normal R2T4 requirements apply
    - Completion beyond 60% point
    - Post-withdrawal disbursements
    - Disbursed and could have been disbursed Title IV funds, etc.

If student does not meet the new withdrawal exemptions, but completes all coursework scheduled to attend (even if only one module), no R2T4 is required since student was only scheduled to attend those modules/days.



#### 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



## RESOURCES & TRAINING



### OTHER R2T4 RESOURCES

- SAP/R2T4 CARES Act provisions (May 15, 2020 electronic announcement)
  - <a href="https://ifap.ed.gov/electronic-announcements/051520UPDATEDGuidanceInterruptStudyRelCOVID19M">https://ifap.ed.gov/electronic-announcements/051520UPDATEDGuidanceInterruptStudyRelCOVID19M</a> <a href="mailto:ay2020">ay2020</a>
- Distance Education and Innovation Final Rule
  - https://www.federalregister.gov/documents/2020/09/02/2020-18636/distance-education-and-innovation
- 2020 FSA Conference Regulatory Update Distance Education and Innovation
  - <a href="https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfS">https://fsaconferences.ed.gov/conferences/library/2020/2020FSAConfS</a> essionB012.pdf



### OTHER R2T4 RESOURCES

- FSA Handbook, Volume 5
- Program Integrity Q & A Return of Title IV Funds
  - https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/return.
     html
- 34 CFR 668.22
- Section 484B of HEA
- Final Regulation published Oct. 29, 2010
- Dear Colleague Letter GEN-11-14
- Dear Colleague Letter GEN-14-23 (R2T4 and Competency-Based Programs)



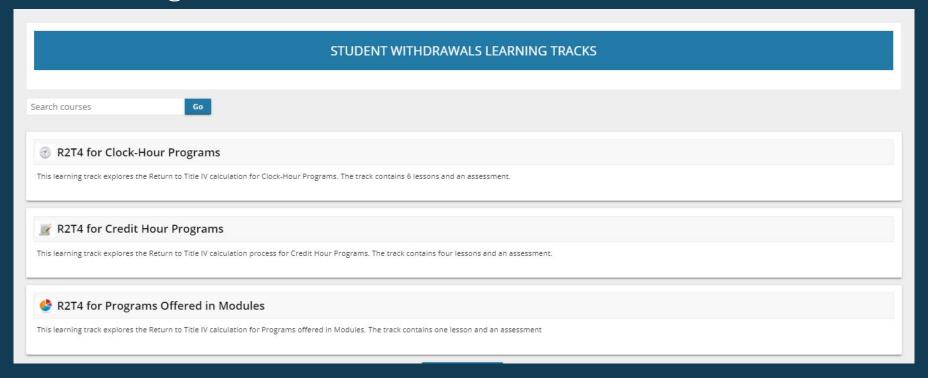
### R2T4 ON THE WEB TOOL

- Currently available in COD
  - Core functionality and calculations did not change
  - Iraq and Afghanistan Service Grant included
  - "Override" functionality will be included for certain modular or nonterm credit-hour situations
- Training available on fsatraining.ed.gov
  - R2T4 in COD: <a href="https://fsatraining.ed.gov/course/view.php?id=283">https://fsatraining.ed.gov/course/view.php?id=283</a>
  - Navigating COD Tools Tab: <a href="https://fsatraining.ed.gov/mod/lesson/view.php?id=7408">https://fsatraining.ed.gov/mod/lesson/view.php?id=7408</a>



## R2T4 – ADDITIONAL TRAINING

- Additional R2T4 training available at FSA Training Center at <a href="https://fsatraining.ed.gov/">https://fsatraining.ed.gov/</a>
- Log in with username and password
- Go to "Learning Tracks" > "Student Withdrawals"





### TRAINING FEEDBACK

- All attendees will receive email from FSA with link to online evaluation at end of conference
- Please complete online FSA session evaluation
  - Helps ensure quality training
  - Informs FSA of areas for improvement
  - Serves as effective tool for "listening" to our school partners



#### **ASK A FED**

Have a policy question? Please use the use the <u>Contact Customer</u> <u>Support Form</u> found in the Help Center on the FSA Partner Connect website and choose "Ask A Fed/Policy" from the topic dropdown list. If you need further assistance, you may contact the School Relations Center at 1-800-848-0978.





# THANK YOU!

