BREAKOUT SESSION LMS #3

Return of Title IV Funds (R2T4) – Clock Hours

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U.S. Department of Education

2022 Virtual FSA Training Conference for Financial Aid Professionals





AGENDA

- **01** Withdrawal Exemption
- **02** Concepts and Definitions
- How the R2T4 Calculation Works
- 04 Making R2T4 Adjustments in COD
- **05** R2T4 Example: Payment Period
- **06** Resources and References



WITHDRAWAL EXEMPTION

R2T4 - WITHDRAWAL EXEMPTION

Upon early program completion, re-prorate the amount of Title
 IV aid paying the student for the hours successfully completed

This is the only withdrawal exemption that applies to clock hour programs

Example

If a student is enrolled in a 900-hour program and graduates after 300 hours in the 2^{nd} payment period, the school would have to prorate *all* Title IV funds and only pay the student for a total of 750 hours, instead of paying for 900 hours

EXAMPLE

- Student enrolls in 900 clock-hour/
 26-week program
- Student receives maximum 2022-2023 Pell Grant award of \$6,895
- \$3500 Subsidized Direct Loan and
 \$2000 Unsubsidized Direct Loan
- Student has completed requirements for graduation at 750 clock-hours



RE-PRORATION PELL EXAMPLE

New Award Based upon 750 hours Two payment periods of 375 Maximum Pell Award = \$6,895

Payment Period 1 (\$6,895 x 375) / 900 = \$2,873 Payment Period 2 $(\$6,895 \times 375) / 900 = \$2,873$

Results in recalculated disbursements for a total award of \$5,746

The school must reduce 1st disbursement by \$575

The school must reduce 2nd disbursement by \$574

The school must return \$1149 to ED



RE-PRORATION DIRECT LOAN EXAMPLE

New Award Based upon 750 hours

Must determine re-prorated annual Subsidized amount

Must determine re-prorated annual additional Unsubsidized amount

Direct Subsidized Loan (\$3,500 x 750) / 900 = \$2,917

Direct Unsubsidized Loan (\$2,000 x 750) / 900 = \$1,667

New DL Annual Subsidized amount is \$2,917 School must reduce the Subsidized Loan 1st disb by \$292, 2nd disb by \$291 and return a total difference of \$583 in DL Subsidized funds to ED

New DL Annual additional Unsubsidized amount is \$1,667 School must reduce the additional Unsubsidized Loan 1st disb by \$166, 2nd disb by \$167 and return total difference of \$333 to ED

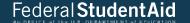
WRITTEN CONFIRMATION

R2T4 requirements do not apply when...

Clock-hour programs

 Student provides written confirmation to resume attendance in same period no later than 60 days after student ceased attending for non-term programs





CONCEPTS AND DEFINITIONS



BASIC R2T4 PRINCIPLES



PERCENT COMPLETED

Student earns
Title IV aid based
on percentage of
period
completed



CLOCK HOURS FORMULA

R2T4 formula
determines
percent completed
and differs from
credit-hour
programs



60 PERCENT THRESHOLD

Student earns
100% of Title IV
funds with *more*than 60%
completed



SCHOOL POLICY

Institutional or other refund policies do not impact R2T4 calculation

APPLICABILITY

34 C.F.R. 668.22

R2T4 requirements apply to any Title IV recipient who withdraws during a payment period or period of enrollment in which the student began attendance



STUDENT DOES NOT BEGIN ATTENDANCE

Institution cannot document attendance for period — Student ineligible for Title IV aid

34 CFR § 668.21

- Institution must return aid disbursed:
 - Federal Pell Grant and Iraq and Afghanistan Service Grant
 - Federal Supplemental Equal Opportunity Grant (FSEOG)
 - TEACH Grant
 - Direct Loan (DL) credited to student's account
 - DL disbursed directly to student if knowledge of nonattendance prior to disbursement
 - Must notify loan servicer if not returning funds disbursed directly to student

PARTIAL WITHDRAWALS AND COMPLETERS

R2T4 requirements do not apply when...

- Student stays enrolled in at least one course during period
- Student qualifies for the withdrawal exemption



CONSUMER INFORMATION

Provide students with...

- Refund policies with which the school must comply
- School's tuition refund policy
- Requirements for treatment of Title IV funds after withdrawal
- Procedures for official withdrawal
 - Office(s) accepting official withdrawal notices



LEAVE OF ABSENCE (LOA)

Temporary interruption in program of study (instead of withdrawal)

Conditions for approved LOA:

- 1. Institution must have formal written policy
- 2. Student and institution must follow policy to request and approve LOA
- 3. Must be reasonable expectation student will return from LOA
- 4. Institution may not assess additional institutional charges or increase student's need

- 5. LOA must not exceed 180 days within 12-month period
- 6. Except in a **clock-hour,** nonterm credit-hour, or subscription-based program, a student returning from an LOA must resume training at the same point in the academic program that he or she began the LOA
- 7. Institution must explain effects on loan repayment and grace period if student borrower fails to return *before approving LOA*



EXCUSED ABSENCES

PROGRAM INTEGRITY Q&A'S



Treatment of excused absence hours when a student graduates before completing all clock hours in a program

- If a student completed 100 percent of a program's hours, including excused absences, no re-proration of Title IV aid is required.
- Excused absence policy must meet the Department's requirements under 34 CFR 668.4(e)

R2T4 ROUNDING RULES

Dollar amounts and percentages



Round calculation to nearest penny

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



May round disbursement or refund to nearest dollar



Calculate out to four decimal places

- 45 days / 101 days = 0.4455
- 199 hours / 450 hours = 0.4422



Round to third decimal place for percentage

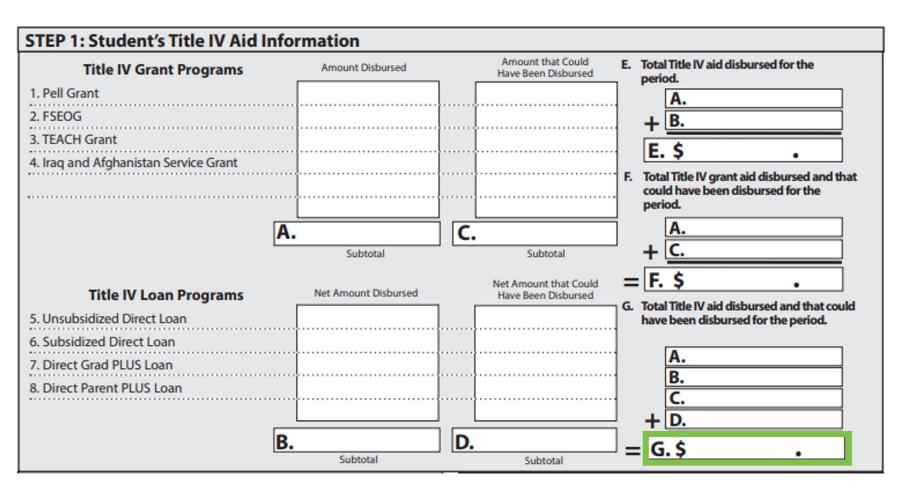
- 0.4455 = 0.446 = 44.6%
- 0.4422 = 0.442 = 44.2%



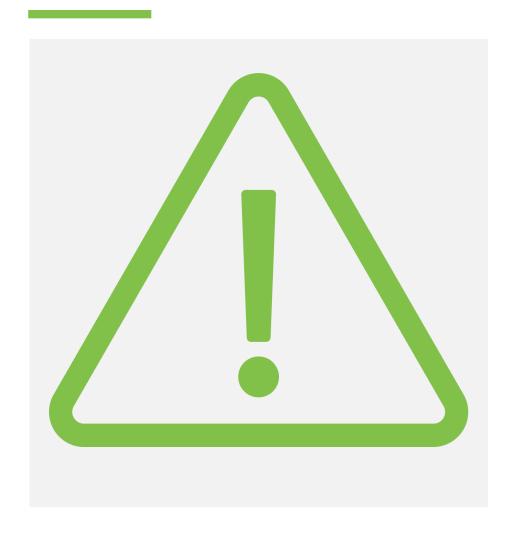
HOW THE R2T4 CALCULATION WORKS



Step 1: Determine amount *disbursed* or *could have been disbursed* at time of withdrawal



AID THAT COULD HAVE BEEN DISBURSED



Include aid that met late disbursement conditions prior to withdrawal

- ED-processed SAR/ISIR with official EFC (for all programs)
- TEACH Grant/Direct Loan originated in school system
- FSEOG award made to student

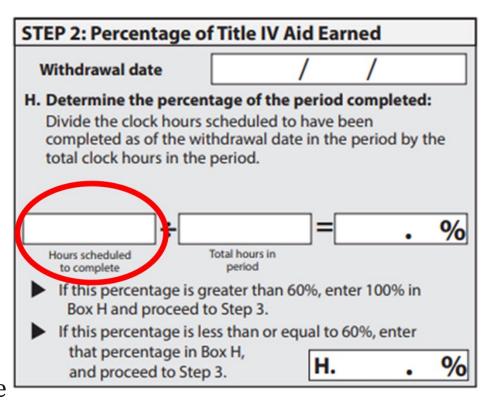


WITHDRAWAL DATE AND AMOUNT COMPLETED

Clock-hour program

Hours scheduled to complete

- Numerator of clock-hour R2T4 calculation
- Scheduled hours completed in PP or POE
- Must use hours established by any state or accrediting agency requirements
- "Hours scheduled" excludes:
 - Leaves of absence
 - "Make-up" hours not part of normal schedule





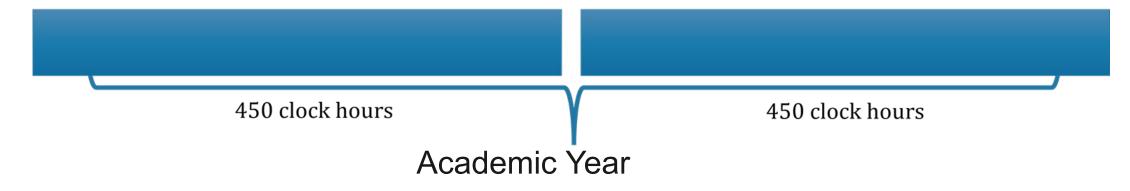
PAYMENT PERIOD OR PERIOD OF ENROLLMENT

Examples

Payment Period

450 clock hours

Period of Enrollment - clock hours (900 clock-hour/26-week academic year)





IMPORTANCE OF DATES

- Withdrawal date determines the percentage of Title IV aid earned
- Date of determination starts the clock ticking for doing the calculation, returning funds, and providing timely notifications to the student





WITHDRAWAL DATE AND AMOUNT COMPLETED

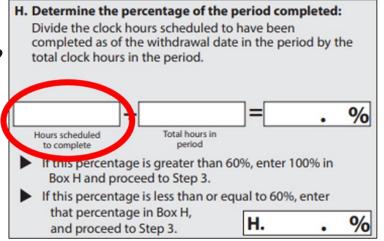
"Total scheduled hours" example

Our College offers a 1500 clock-hour cosmetology program. Students are scheduled to attend five clock hours each day, Monday – Friday.

One student withdraws on Day 35 of the program (not calendar days) and completed 135 clock hours.

How many hours do you enter in "Hours scheduled to complete"?

- a. 135
- b. 175
- c. 450



SCHEDULED HOURS EXCEEDS PAYMENT PERIOD

Question: What happens when the student withdraws at 500 scheduled hours but is still enrolled in the first payment period?



Answer: Calculate Step 2 using scheduled hours and total hours in first Payment Period.

- Calculation equals 500/450 = 111%, rounded to 100%
- Student earns 100% of Title IV aid for Payment Period 1

SCHEDULED HOURS EXCEEDS PAYMENT PERIOD

Question: What happens when the student withdraws at 1190 scheduled hours and the student is still enrolled in the second payment period with 800 clock hours completed?

Payment Period 1: 0-450 hours

Payment Period 3: 901-1200 hours

Payment Period 2: 451 - 900 hours * Student withdraws

Payment Period 4: 1201-1500 hours

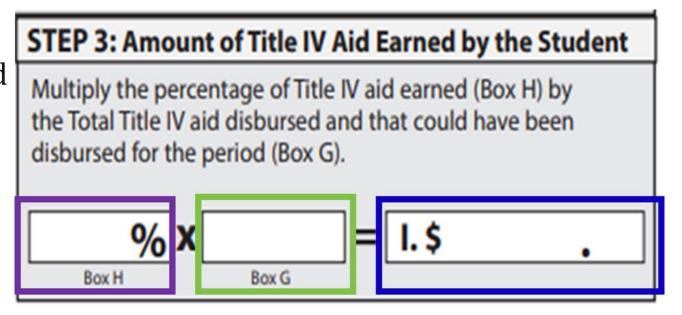
Answer: Calculate Step 2 using scheduled hours and total hours in second Payment Period.

- Calculation equals 1190- 450 (subtract PP1) = 740 scheduled clock hours
- 740/450 (2nd PP) = 166% (rounded down to 100%)
- Student earns 100% of Title IV aid



Step 3: Calculate amount of Title IV aid earned by student

Multiply percentage of Title IV aid earned (Box H) by Total Title IV aid disbursed and could have been disbursed (Box G)





Step 4: Determine Title IV post-withdrawal disbursement (PWD) *or* return

Compare Box I (Title IV earned by student) to Box E (Total aid disbursed)

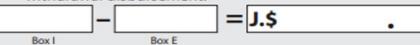
- PWD required if amount earned greater than amount disbursed (Box J)
- Return of funds required if amount earned *less than* amount disbursed (Box K)
- No further action required if boxes are equal

STEP 4: Title IV Aid to be Disbursed or Returned

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

J. Post-withdrawal disbursement

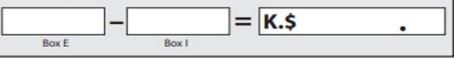
From the amount of Title IV aid earned by the student (Box I) subtract the total Title IV aid disbursed for the period (Box E). This is the amount of the post-withdrawal disbursement.



If there's an entry for "J," **STOP here**, and enter the amount in Box 1 on Page 3 (Post-withdrawal disbursement tracking sheet).

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.

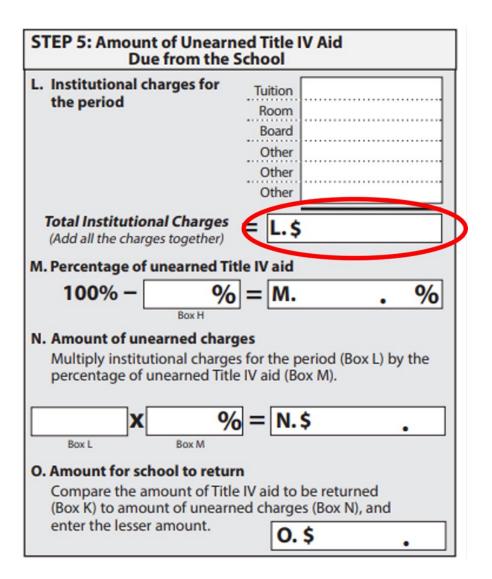




INSTITUTIONAL CHARGES

Total institutional charges

- Charges do not affect earned Title IV aid
- Include charges initially assessed for period or adjusted *prior to* withdrawal
- Charges may not be reduced if paid by non-Title IV sources
- Prorate any charges assessed for period longer than period used in R2T4 calculation



Federal Student Aid

INSTITUTIONAL VS. NON-INSTITUTIONAL CHARGES

INSTITUTIONAL CHARGES

- Tuition, fees, and room and board (if contracted with school)
- Required course materials (books, kits, tools, supplies, etc.) if no real and reasonable opportunity to purchase elsewhere

NON-INSTITUTIONAL CHARGES

- Required course materials if student had a real and reasonable opportunity to purchase elsewhere (EA March 5, 2019)
- Group health insurance fees if required for all students, and coverage remains in effect even after withdrawal
- Discretionary, educationally-related expenses (e.g., parking, library fines, etc.)



EQUIPMENT CHARGES



*Institution's cost – not amount charged to students

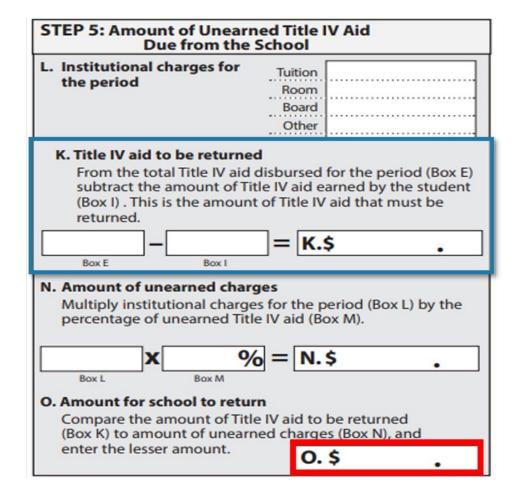
- Institution may exclude documented cost* of equipment from institutional charges if:
 - Unreturnable
 - Returnable but not returned in good condition within 20 days of withdrawal
- Institution's return policies must be reasonable, consistent, and fair to all students
 - Institution must notify students in writing of these policies when they enroll



Step 5: Amount of unearned Title IV aid due from the school

Determine institution's responsibility to return

- Use charges assessed to student prior to withdrawal (Box L)
- Multiply total charges by percentage of unearned aid (Box L x Box M) for unearned charges (Box N)
- Institution returns lesser of unearned charges or total unearned Title IV aid (Box O)

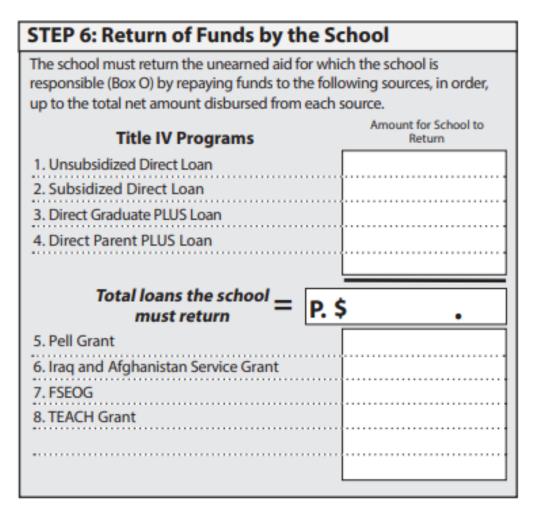




Step 6: Return of funds by the school

Document order of return of funds

 Return up to net amount disbursed from each source





Steps 7 – 10: Determine amount of unearned Title IV aid due from the student

Student may be responsible to return funds

- <u>Step 7</u>: Determine initial amount due from student
- Step 8: Amount of loan funds student must repay (according to MPN)
- Step 9: Amount of grant funds student must repay (after 50% grant protection)
- Step 10: Grant funds order of return
 - Student not responsible for amounts of \$50 or less

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 in order as indicated, up to the 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			
		Title IV Grant Flograms	Amount to Return
		1. Pell Grant	
2. Iraq and Afghanistan Service Grant			
3. FSEOG			
4. TEACH Grant			

RETURNING FUNDS & POST-WITHDRAWAL DISBURSEMENTS

RETURNS BY STUDENT

Grant Overpayments

- Notify student of overpayment within 30 days of date of determination
- Student retains Title IV eligibility for 45 days after overpayment notice
- Student extends Title IV eligibility by:
 - Paying overpayment in full, or
 - Signing repayment agreement with institution (optional) or ED



RETURNS BY STUDENT

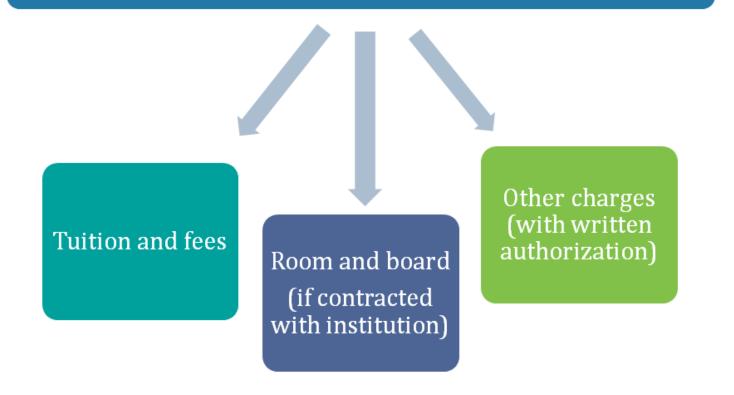
Grant Overpayments

- Student not required to repay overpayment of \$50.00 or less
- Resolve overpayment through:
 - Full and immediate payment to institution
 - Signing repayment agreement with institution
 - Negotiating repayment with ED
- Return grant overpayment in order

34 CFR 668.164(J)

- Must meet
 late disbursement
 conditions
 in 34 CFR
 668.164(j)
- Must be made from grant funds before loans

May be applied to outstanding charges:



PWD CRITERIA FOR TITLE IV GRANT FUNDS

- Receive ED-processed SAR/ISIR with official EFC prior to withdrawal
- Disburse to student's account to cover current charges within
 180 days of date of determination
 - Tuition and fees
 - Room and board (if contracted with institution)
 - Other charges (with written authorization)
- Disburse directly to student to cover allowable charges no later than 45 days of date of determination



NOTIFICATION AND DISBURSEMENT OF PWD FOR TITLE IV LOAN FUNDS



- Written notification of PWD loan funds to student (or parent for PLUS loan)
- Must send within 30 days of date of determination
 - Must specify loan type and amount
 - Must explain obligation to repay loan
 - Must request confirmation before disbursing funds
 - Must specify deadline to respond (at least 14 days)



NOTIFICATION AND DISBURSEMENT OF PWD FOR TITLE IV LOAN FUNDS

Must disburse loan funds **no later than 180 days** after date of determination

LATE RESPONSE FROM BORROWER

- Institution choice to honor late response
- Must send written notification explaining refusal to honor late response

NO RESPONSE FROM BORROWER

No loan PWD



VERIFICATION AND R2T4

- If verification not complete within timeframe to meet R2T4 deadlines, school excludes aid subject to verification from calculation
- If verification is then completed after R2T4 deadlines but before verification deadlines, school must recalculate R2T4 including verified amounts as aid that could have been disbursed



RETURN AFTER WITHDRAWAL

Clock hour programs

- If the student returns to the same program within 180 days –
 - The student is treated as if they never left and returns to the same payment period.



RETURN AFTER WITHDRAWAL

Clock hour programs

- If withdrawn student re-enters same program of study after 180 days, or transfers into new program at any time
 - Student begins new payment period upon reentry or transfer
 - Remaining portion of program treated as length of entire program for awarding Title IV funds



MAKING R2T4 ADJUSTMENTS IN COD



COD: R2T4

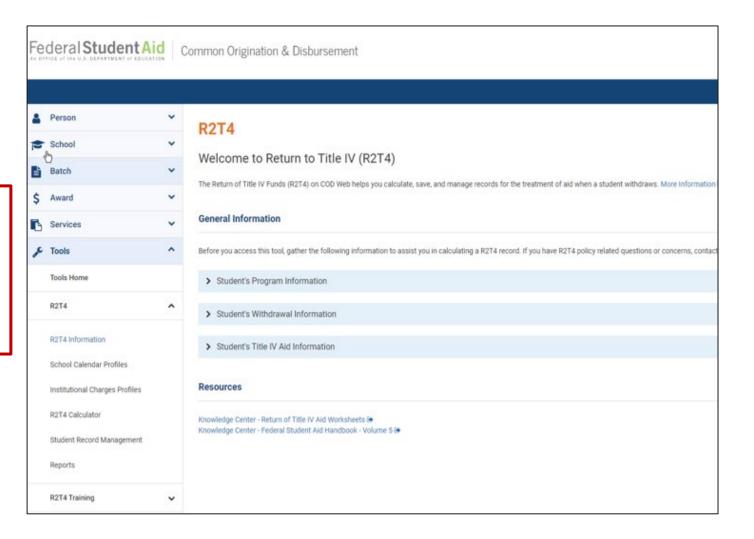
- R2T4 in COD
 - Base year for tool was 2017-18
 - Data (i.e., calculations, PDFs) will be available for ten years from base-year
 - Iraq and Afghanistan Service Grant included in tool calculation



COD: R2T4

Available on:

- https://cod.ed.gov
- R2T4 Home Page is located under "Tools" drop-down





COD: R2T4

- R2T4 enhanced functionality
 - Ability to copy/modify institutional and calendar profiles within an aid year
 - User can recalculate without creating a new record
 - Reports will be consolidated into one file for export
 - Search by award year(s) and Payment Period or Period of Enrollment start/end dates



R2T4 EXAMPLE



EXAMPLE PROFILE: PAYMENT PERIOD

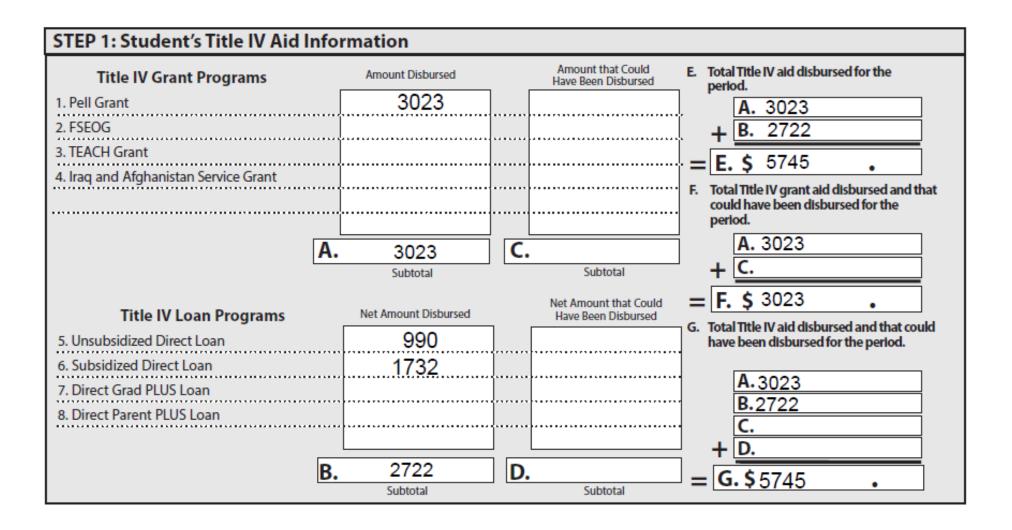
- Serenity enrolled in a 900 hour/ 26-week Cosmetology program
- Payment Period Start date: June 6
- Serenity's LDA was June 22nd
- At the time of withdrawal, Serenity was scheduled to have completed 45 hours.
- On the first day of the payment period, June 6, Serenity received the following disbursements: Pell Grant \$ 3023, Net Subsidized Direct Loan \$ 1,732.00, Net Unsubsidized Loan: \$990
- Total Institutional Charges: \$5800



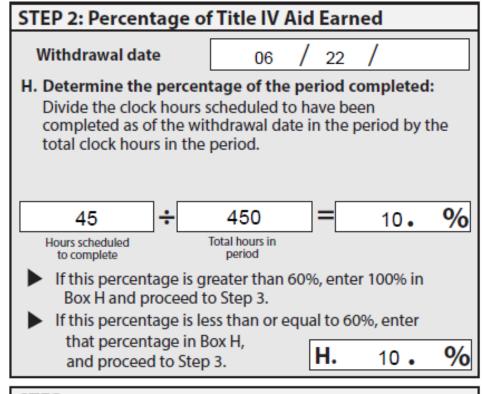
R2T4 CLOCK-HOUR HAND CALCULATION

Treatment Of Title IV Funds When A Student Withdraws From A Clock-Hour Program				
Student's Name	Serenity Student	Social Security Number	XXX-XX-XXXX	
Date form completed	6 / 29 /	Date of school's determination that student withdrew	06 / 24 /	
Period used for calculation (check one)		Period Period	d of enrollment	





CLOCK-HOUR STEPS 2 & 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).

STEP 4: Title IV Aid to be Disbursed or Returned

- If the amount in Box I is greater than the amount in Box E, go to Item J (Post-withdrawal disbursement).
- If the amount in Box I is less than the amount in Box E, go to Title IV aid to be returned (Item K).
- If the amounts in Box I 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.

Box I Box E

If there's an entry for "J," **STOP here**, and enter the amount in Box 1 on Page 3 (Post-withdrawal disbursement tracking sheet).

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.

STEP 5: Amount of Unearned Title IV Aid Due from the School					
L. Institutional charges	Tuition	5500			
for the period	Room Board Other Other Other	300			
Total Institutional Charges (Add all the charges together)	= L.\$	5800			
M. Percentage of unearned Title IV aid					
100% - 10 %	= M.	90. %			
N. Amount of unearned charges Multiply institutional charges for the period (Box L) by the percentage of unearned Title IV aid (Box M).					
5800 X 90 9 /	6= _{N.\$}	5220.			
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.\$ \$5170.50					
	0.5	φ5170•50			



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	Amount for School to Return			
Unsubsidized Direct Loan	990			
2. Subsidized Direct Loan	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
3. Direct Grad PLUS Loan				
4. Direct Parent PLUS Loan				
Total loans the school = P. \$ 2722 .				
5. Pell Grant	2448.50			
6. Iraq and Afghanistan Service Grant				
7. FSEOG				
8. TEACH Grant				

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).

\$5170.50

- \$5170.50

= Q.

0.00

Box K

Box O



If Box Q is ≤ zero, (STOP) If greater than zero, go to Step 8.



RESOURCES AND REFERENCES



RESOURCES

Return of Title IV Funds

- 2022–23 Federal Student Aid Handbook, Volume 5
- 34 CFR 668.22 Treatment of Title IV funds when a student withdraws.
- Program Integrity Q&A Return of Title IV Funds
- R2T4 Tool in Common Origination & Disbursement (COD) system
- FSA Training Center
 - Learning Tracks Student Withdrawals
 - R2T4 for Clock-Hour Programs
 - Training Courses FSA Basic Training for New Staff (Departures)
- R2T4 Training on COD



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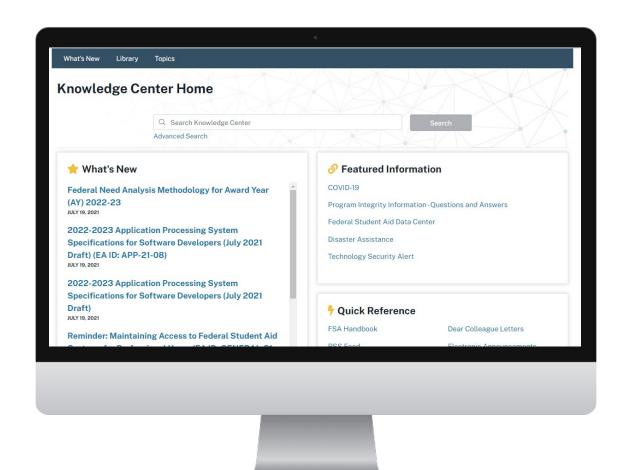
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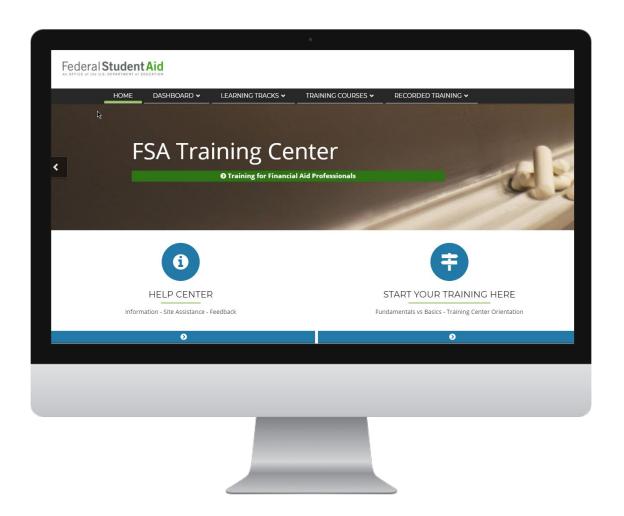




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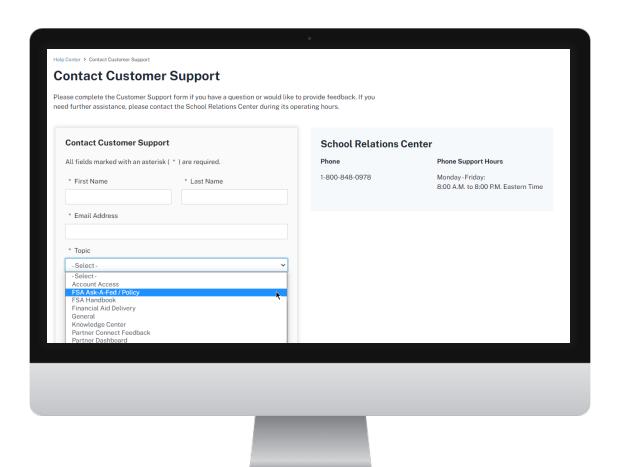


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