

RETURN OF TITLE IV AID AND MODULES



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AGENDA

- 1 New Regulations
- 2 Written Confirmation
- 3 Exemptions
- 4 Scheduled Days
- 5 References & Resources



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RETURN OF TITLE IV (R2T4) - BACKGROUND

- Section 484B(a)(1) of the HEA and 34 CFR 668.22 indicate that if a Title IV recipient who commenced attendance withdraws from an institution during the payment period or period of enrollment, the institution must perform an R2T4 calculation to determine the amount of Title IV funds to be returned
- A student has earned 100% of their Title IV aid if they withdraw after the 60% point in the payment period or period of enrollment

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NEW REGULATIONS

Final Rules published September 2, 2020

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NEW REGULATIONS

- Notice of Proposed Rulemaking (NPRM) published April 2, 2020 (Distance Education and Innovation)
- Comment period ended May 4, 2020
- Final Rules published September 2, 2020
- Effective July 1, 2021
- Early implementation of all provisions

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R2T4 – NEW REGULATION EFFECTIVE DATE

- For those schools that did not early implement, please note that the new regulations will apply to students who *withdraw or otherwise cease attendance (including graduate) on or after July 1, 2021*
 - The timeframe is **based on the timing of the withdrawal or ceasing attendance** itself, not on the timing of the payment period start date.

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R2T4 – ORDER OF RETURN

- Order of return, 34 CFR 668.22(i) :

1. Unsubsidized Federal Direct Stafford Loans
2. Subsidized Federal Direct Stafford Loans
3. Federal Direct PLUS Loans
4. Federal Pell Grants
5. Iraq and Afghanistan Service Grants
6. FSEOG
7. TEACH Grants



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R2T4 – LOA IN SUBSCRIPTION PROGRAM

- Approved leave of absence (LOA)
 - Clock hour, nonterm credit hour and subscription-based programs do not have to permit the student to complete coursework the student began prior to the leave of absence (34 CFR 668.22(d))

New Regs effective July 1, 2021 (early implementation permitted)

Clock hour, nonterm credit hour and subscription-based programs do not require the institution to permit the student to complete coursework the student began prior to the leave of absence to grant an approved leave of absence

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R2T4 – ACADEMIC ATTENDANCE

34 CFR 668.22(l) and 600.2

- 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

New Regs effective July 1, 2021
(early implementation permitted)

Academic engagement: Active participation by a student in an instructional activity related to the student's course of study that—

- (1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;**
 (2) Includes, but is not limited to—
 (i) **Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;**
 (ii) Submitting an academic assignment;
 (iii) **Taking an assessment** or an exam;
 (iv) **Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;**
 (v) Participating in a study group, **group project, or an online discussion that is assigned by the institution;** or
 (vi) **Interacting with an instructor about academic matters;**
 and
 (3) *Does not include, for example—*
 (i) Living in institutional housing;
 (ii) Participating in the institution's meal plan;
 (iii) *Logging into an online class or tutorial without any further participation;* or
 (iv) Participating in academic counseling or advisement.

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R2T4 - MODULES

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- Definition of “modules”
 - A program is “offered in modules” if the program uses a *standard term or nonstandard-term academic calendar, is not a subscription-based program*, and a course or courses in the program do not span the entire length of the payment period or period of enrollment (34 CFR 668.22(l))
 - New definition specifically excludes non-term programs (including clock hour programs) and subscription-based programs from being considered a program offered in modules for R2T4 purposes

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R2T4 – CONSIDERED WITHDRAWN

- Re-entry timeframe and withdrawal (34 CFR 668.22(a))
 - 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

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WRITTEN CONFIRMATION

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R2T4

Overview of Written Confirmation

(34 CFR 668.22(a))

New Regs effective July 1, 2021 (early implementation permitted)

For **standard and nonstandard term programs**, excluding subscription-based programs, written confirmation is for a module in same payment period/period of enrollment that begins *no later than 45 calendar days after the end of the module the student ceased attending*

For a **subscription-based program** written confirmation is for a date that occurs within the same payment period or period of enrollment and *is no later than 60 calendar days after the student ceased attendance*

For a **non-term program**, written confirmation is for a date that is *no later than 60 calendar days after the student ceased attendance*

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R2T4 – WRITTEN CONFIRMATION

- A student is not considered to have withdrawn if the institution obtains written confirmation from the student at the time of withdrawal that he or she will attend a later module in the same payment period/period of enrollment; and
 - For *standard and nonstandard term programs*, excluding subscription-based programs, that module begins *no later than 45 calendar days after the end of the module the student ceased attending*
 - For a *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*

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R2T4 – 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

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R2T4 – 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

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RETURN AFTER WITHDRAWAL REMINDER

- If returning in the same payment period, the student is treated as if he or she did not cease attendance
 - The school must “undo” the R2T4 calculation
- Restore student’s original amounts with no adjustment for partial attendance of a module
 - Except if a student never began all of her courses
 - Adjustments may need to be made to the original Title IV award amounts, such as Pell Grant recalculations

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WITHDRAWAL EXEMPTIONS

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R2T4

Overview of Withdrawal Exemptions

(34 CFR 668.22(a))

**New Regs effective July 1, 2021
(early implementation permitted)**

Not considered withdrawn if student successfully completes:

- 1.) All requirements for graduation from his or her program before completing the days or hours in the period that the student was scheduled to complete
- 2.) One module that includes 49% or more of the number of days in the payment period
- 3.) A combination of modules that when combined contain 49% or more of the numbers of days in the payment period; or
- 4.) Coursework equal to or greater than the coursework required for the institution's definition of a half-time student

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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)



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R2T4 – WITHDRAWAL EXEMPTIONS

- Withdrawal exemption for programs offered in modules
 - In a program offered in modules, a student is not considered to have withdrawn if the student successfully completes—
 - One module or a combination of module(s) that includes 49 percent or more of the number of days in the payment period, excluding scheduled breaks of five or more consecutive days that apply to all students who enroll in the term and all days between modules
 - 49% may NOT be rounded up (i.e. 48.7% CANNOT be rounded up to 49%)
 - 49% is based on the number of days in the overall payment period, not 49% of the modules the student was enrolled in for a particular payment period
 - Successful completion means earning a passing grade

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R2T4 – WITHDRAWAL EXEMPTIONS

- Withdrawal exemption for programs offered in modules
 - In a program offered in modules, a student is not considered to have withdrawn if the student successfully completes—
 - Coursework equal to or greater than the coursework required for the institution's definition of a half-time student under § 668.2 for the payment period
 - Successful completion means earning a passing grade
 - ½ time enrollment is at least half the workload of the applicable minimum requirements outlined in the definition of a full-time student

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R2T4 – MODULE WITHDRAWAL QUESTIONS

Questions to help determine if a student enrolled in modules has withdrawn:

1. Did the student cease to attend, or fail to begin attendance in a scheduled course that was included in the institution's calculation of the student's Title IV awards for the payment period or period of enrollment?
 - If yes, go to question 2
 - If no, student is not a withdrawal
2. When the student ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses in the period?
 - If yes, student is not a withdrawal, but Pell recalculations may apply
 - If no, go to question 3
3. When the student ceased to attend or failed to begin attendance in a scheduled course, did the student complete all the requirements for graduation?
 - If yes, student is not a withdrawal, but Pell recalculations may apply
 - If no, go to question 4

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R2T4 – MODULE WITHDRAWAL QUESTIONS

Withdrawal questions continued:

4. When the student ceased to attend or failed to begin attendance in a scheduled course, did the student successfully complete:
 - a module or combination of modules that contain 49% or more of the number of days of the payment period (excluding scheduled breaks of 5 consecutive days or more and all days between modules); OR
 - coursework equal to or greater than the coursework required for the institution's definition of a half-time student for the payment period?
 - If yes to either question, student not a withdrawal, but Pell recalculations may apply
 - If no, go to question 5
5. Did the student confirm attendance in a later module in the payment/enrollment period (45-day rule for standard or nonstandard programs)
 - If yes, not a withdrawal, but Pell recalculations may apply
 - If no, student is a withdrawal

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R2T4 – WITHDRAWAL EXEMPTION EXAMPLES

- Student completes all requirements for graduation
 - **For clock-hour programs only**
 - If a student graduates without successfully completing all of the established hours in the program, a school must re-prorate the amount of TIV aid and only pay the student for the hours successfully completed
 - In our upcoming example, since the student left after 300 hours in the 2nd payment period, the school would have to prorate TIV funds and only pay the student for a total of 750 hours, instead of paying for 900 hours
 - This proration adjustment does not apply to credit-hour programs

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R2T4 – WITHDRAWAL EXEMPTION EXAMPLE

Student completes all requirements for graduation (clock hour example)

The student isn't considered a withdrawal because they completed the necessary requirements to graduate even though they haven't completed the hours.



Completed course work to graduate, **no R2T4 is needed**

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 1

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

One module that includes 49% or more of the days in the payment period

W

Semester Payment Period (105 days) – Student enrolled in 9 credit hours

Module 1 (52 days) – Student enrolled in 3 credit hours

B

?? R2T4 ??
Required or **Not Required**

Grades 52 days / 105 days = 49.5%, **R2T4 is not required**

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 2

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

One module that doesn't include 49% or more of the days in the payment period

W

Semester Payment Period (105 days) – Student enrolled in 9 credit hours

Module 1 (51 days) – Student enrolled in 3 credit hours

B

?? R2T4 ??
Required or Not Required

Grades 51 days / 105 days = 48.5%, **R2T4 is required**

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 3

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

One module that includes 49% or more of the days in the payment period, no passing grade

W

Semester Payment Period (105 days) – student enrolled in 9 credit hours

Module 1 (52 days) – student enrolled in 3 credit hours

F

?? R2T4 ??

Required or Not Required

52 days / 105 days = 49.5%, Didn't successfully complete Module 1 with a passing grade, **R2T4 is required.**

Grades

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 4

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

Successfully completed ≥ 49% of days in multiple modules

W

Semester Payment Period (80 days)

Module 1 (20 days) 3 credit hours	Module 2 (20 days) 2 credit hours	Module 3 (20 days) 3 credit hours	Module 4 (20 days) 2 credit hours
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D C

?? R2T4 ??

Required or Not Required


40 days / 80 days = 50%, Student successfully completed more than 49%, **R2T4 is not required**

Grades

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 5



Didn't successfully complete $\geq 49\%$ of days nor half time coursework

W

Semester Payment Period (100 days)

Module 1 (20 days) 3 credit hours	Module 2 (20 days) 2 credit hours	Module 3 (20 days) 3 credit hours	Module 4 (20 days) 2 credit hours	Module 5 (20 days) 2 credit hours
--------------------------------------	--------------------------------------	--------------------------------------	--------------------------------------	--------------------------------------

B C

?? R2T4 ??


Required or Not Required

40 days / 100 days = 40%, Didn't successfully complete more than 49% of days, nor $\frac{1}{2}$ time coursework, **R2T4 is required**

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 6



Didn't successfully complete $\geq 49\%$ of days nor half time coursework

W

Semester Payment Period (100 days)

Module 1 (40 days) 6 credit hours	Module 2 (25 days) 3 credit hours	Module 3 (35 days) 3 credit hours
--------------------------------------	--------------------------------------	--------------------------------------

C & F F

?? R2T4 ??

Required or Not Required

40 days / 100 days = 40%, Didn't successfully complete more than 49% of days, nor $\frac{1}{2}$ time coursework, **R2T4 is required**

W = Withdrawal Grades

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 7

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

Successfully completed coursework \geq half time

W

Semester Payment Period (105 days) – Student enrolled in 6 credit hours

Module 1 (45 days) – Student enrolled in 6 credit hours

B & A

?? R2T4 ??

Required or **Not Required**

45 days / 105 days = 42.8%; **However**, student successfully completed 6 hours, half time, **R2T4 is not required**

Grades

W = Withdrawal

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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 8

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

Successfully completed coursework \leq half time

W

Semester Payment Period (105 days) – Student enrolled in 6 credit hours

Module 1 (45 days) – Student enrolled in 6 credit hours

B & F

R2T4

Required or Not Required

45 days / 105 days = 42.8%

Student **only** successfully completed 3 hours, less than half time

R2T4 is required

Grades

W = Withdrawal

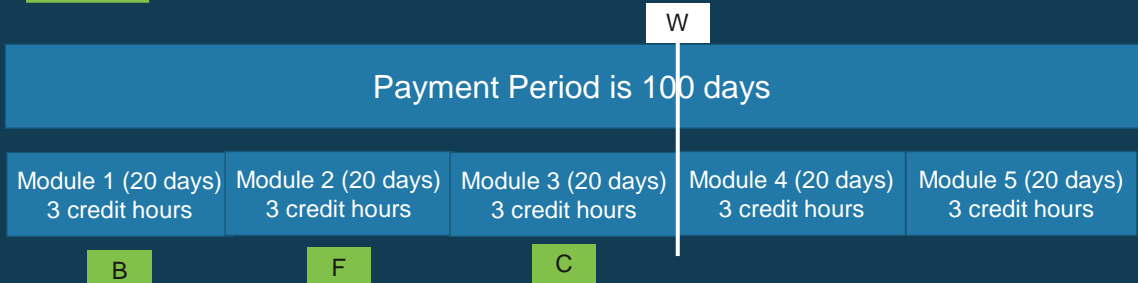
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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 9

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U.S. DEPARTMENT OF EDUCATION

Successfully completed coursework \geq half time



?? R2T4 ??
Required or **Not Required**

40 days / 100 days = 40%, Didn't successfully complete more than 49% of days, did complete 1/2 time coursework, **R2T4 is not required**

W = Withdrawal Grades

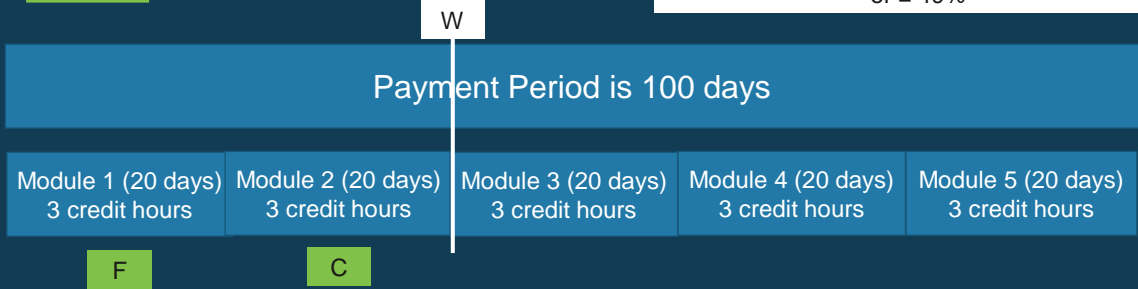
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R2T4 WITHDRAWAL EXEMPTION CREDIT HOUR EXAMPLE 10

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

Didn't successfully complete coursework or \geq 49%



?? R2T4 ??
Required or Not Required

20 days / 100 days = 20%, Didn't successfully complete more than 49% of days, didn't complete 1/2 time coursework, **R2T4 is required**

W = Withdrawal Grades

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R2T4 – WITHDRAWAL EXEMPTIONS REMINDER

- The requirements for a withdrawal exemption (49%, ½ 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.

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SCHEDULED DAYS

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New Regs effective July 1, 2021 (early implementation permitted)

R2T4

Overview of Number of Days Scheduled (34 CFR 668.22(l))

In the case of a program that is measured in credit hours, the student does not complete all the days in the payment period or period of enrollment that the student was scheduled to complete

- For modules-
 - A student in a program offered in modules is scheduled to complete the days in a module if the student's coursework in that module was used to determine the amount of the student's eligibility for title IV, HEA funds for the payment period or period of enrollment

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R2T4 – SCHEDULED DAYS IN MODULES

- Definition of number of days scheduled to complete in modules
 - A student in a program offered in modules is scheduled to complete the days in a module if the student's coursework in that module was used to determine the amount of the student's eligibility for title IV, HEA funds for the payment period or period of enrollment
 - A school includes the days in a module in the denominator of the R2T4 calculation if:
 - The student attended at least one day in the module; or
 - The student did not attend at least one day in the module, but the module was included in the institution's determination of the student's Title IV eligibility (demonstrated in later slides using SD-Q2)

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R2T4 – SCHEDULED DAYS IN MODULES

- Two ways to determine the number of days scheduled to complete in modules (denominator in R2T4 calculation) that the student did not attend:
 1. Using the student’s enrollment schedule at a fixed point (optional) to determine the number of days the student is scheduled to attend during the period for R2T4 purposes (“R2T4 freeze date”), or
 2. Monitor changes in the student’s enrollment throughout the period (no R2T4 freeze date)
 - fluctuations in a student’s enrollment status (adding or dropping coursework throughout the period) may cause the number of days to change

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R2T4 – SCHEDULED DAYS IN MODULES

- Definition of number of days scheduled to complete in modules
- Using an R2T4 freeze date
 - Subsequent enrollment fluctuations will typically not alter the number of days
 - Reminder – always include days in modules in denominator if attend module
 - The R2T4 freeze date, can coincide with other dates (e.g. census dates, Pell recalculations dates, etc.) or be a separate date
 - Similar to Pell recalculation dates, institutions may use multiple R2T4 Freeze Dates for multiple modules

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R2T4 – SCHEDULED DAYS IN MODULES

Please note:

- An institution must ensure that the R2T4 freeze date for a given payment period or period of enrollment will not occur prior to the timeframe when most students enroll for classes for the period.
- A school is not permitted to structure the timing of students' enrollment such that students are only enrolled in a single module when the R2T4 freeze date occurs but then enrolls in other modules and receives more Title IV aid after the R2T4 freeze date.

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R2T4 – SCHEDULED DAYS IN MODULES

SD-Q2: How does an institution determine whether the days in a module are included in the R2T4 calculation if the school chooses to use an R2T4 Freeze Date?

SD-A2: If the institution uses an R2T4 Freeze Date, the days in a module are included in the R2T4 calculation **if the student attends the module or is enrolled in the module on the R2T4 Freeze Date.**

https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/ret_urn.html#mod

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R2T4 – SCHEDULED DAYS IN MODULES



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SD-Q2: How does an institution determine whether the days in a module are included in the R2T4 calculation if the school chooses NOT to use an R2T4 Freeze Date?

SD-A2: The answer depends on whether the institution uses an R2T4 Freeze Date (see RCFD-A1 for additional explanation of the R2T4 Freeze Date) and the type(s) of Title IV aid for which the student is eligible during the payment period or period of enrollment.

When a student enrolls in a module during a payment period or period of enrollment, the following guidance applies to all courses the student enrolls in including full-term courses during the period.

If the institution uses an R2T4 Freeze Date, the days in a module/course are included in the R2T4 calculation if the student attends the module/course or is enrolled in the module/course on the R2T4 Freeze Date. However, if a student is enrolled in a period and the institution uses an R2T4 Freeze Date and the student withdraws prior to the R2T4 Freeze Date, the institution includes the days associated with any module/course the student started and any module/course the student was enrolled in for the period as of the withdrawal date.

If the student is only eligible for Pell Grant, Iraq-Afghanistan Service Grant, and/or TEACH Grant funds during the period and the institution does NOT use an R2T4 Freeze Date, the days in a module/course must be included in the denominator of the R2T4 calculation only if the student actually attends the module/course. This is because Pell Grant, Iraq-Afghanistan Service Grant, and TEACH Grant recalculation requirements ultimately require institutions to exclude from consideration in the student's enrollment status any coursework that the student did not attend.

If the student is eligible for Direct Loan or FSEOG funds during the period (regardless of eligibility for other Title IV programs) and does NOT use an R2T4 Freeze Date, the days in a module/course must be included in the R2T4 calculation if the student was enrolled in the module/course on the first day of the period or enrolled in the module/course at any time during the period. This is because a student's cost of attendance for these programs is affected by the student's enrollment in all modules during a payment period or period of enrollment. **[revised 11/24/21]**

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R2T4 – SCHEDULED DAYS IN MODULES

EXAMPLE 1

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No freeze date (Pell only recipient)



- School must perform a mandatory Pell recalculation and pay the student a ½ time Pell amount
- Since the student never attended module 2, *the days in module 2 are NOT factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date

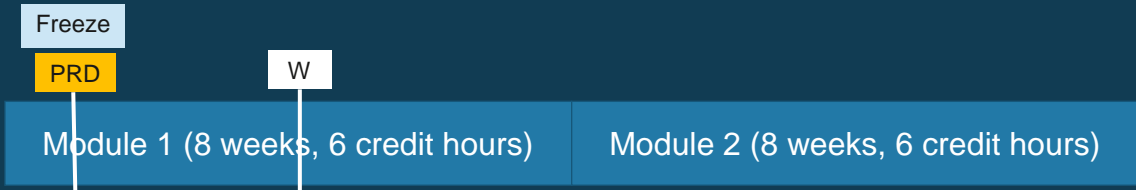
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R2T4 – SCHEDULED DAYS IN MODULES EXAMPLE 2

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

Freeze date (Pell only recipient)



- School must perform a mandatory Pell recalculation and pay a ½ time Pell
- Since the coursework enrolled in as of the school’s R2T4 freeze date was for modules 1 and 2, *the days in both modules are factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

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R2T4 – SCHEDULED DAYS IN MODULES EXAMPLE 3

Federal Student Aid
U.S. DEPARTMENT OF EDUCATION

No R2T4 freeze date (Pell recipient and later eligible for DL Funds)



Enrolls in 3 hours in mod 2, less than 1/2 time Pell and DL disbursement made


- School does not have to do a Pell recalculation; loan funds do not have to be adjusted since student started a class and was registered ½ time at time of disbursement
- Since the school did not use an R2T4 Freeze Date and the student was awarded a Direct Loan, the school will factor in the days of any module the student enrolled in throughout the payment period. In this case, the student enrolled in courses in both module 1 and 2 and therefore, *the days in both modules 1 and 2 are factored into the R2T4 calculation.*

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

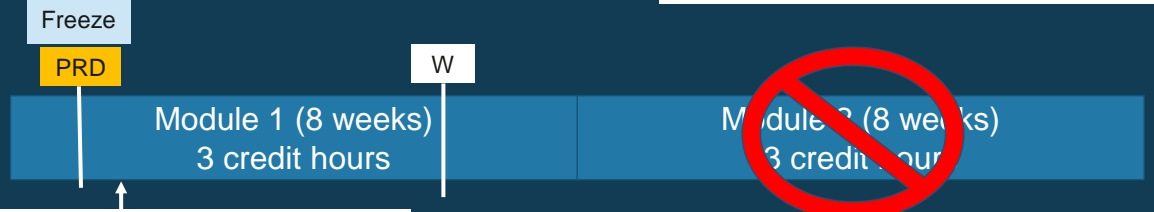
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R2T4 – SCHEDULED DAYS IN MODULES EXAMPLE 4



R2T4 freeze date (Pell recipient and later eligible for DL Funds)




Enrolls in 3 hours in mod 2, less than ½ time Pell and DL disbursement made

- School does not have to do a Pell recalculation; loan funds do not have to be adjusted since student started a class and registered ½ time at time of disbursement
- Since the coursework enrolled in as of the school's R2T4 freeze date was only for module 1 AND the student never attended at least one day in module 2, *only the days in module 1 are factored into the R2T4 calculation*

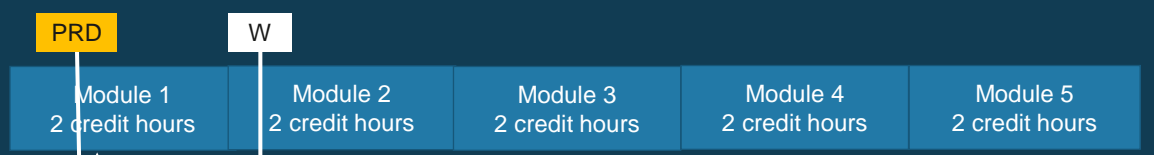
W = Withdrawal
 PRD = Pell Recalculation Date
 Freeze = Freeze Date

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R2T4 – SCHEDULED DAYS IN MODULES EXAMPLE 5



No R2T4 freeze date (Pell only recipient)



School disburses 3/4 time Pell

- School must perform a mandatory Pell recalculation and pay the student a less than ½ time Pell amount (only started 4 hours)
- Since the student only received Pell Grant funds and the school did not use an R2T4 Freeze Date, the school will only use the days from the module(s) that the student *actually attended*. Since the student attended module 1 and 2, regardless of the amount of Pell Grant funds received, *the days in module 1 and 2 are factored into the R2T4 calculation.*

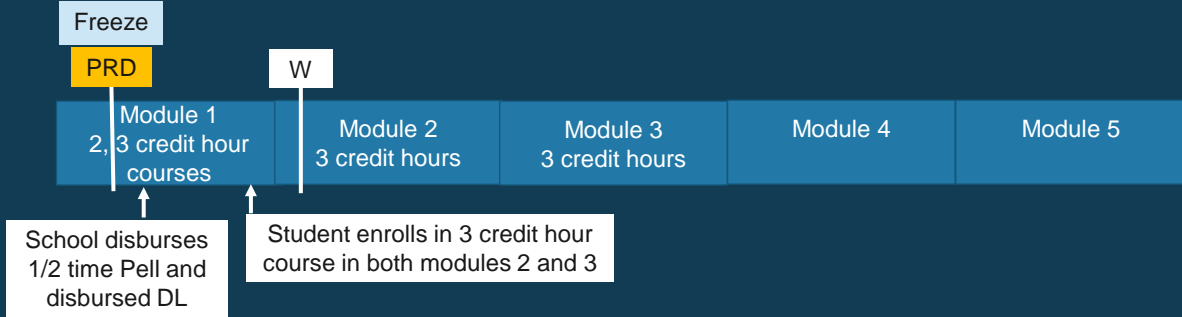
W = Withdrawal
 PRD = Pell Recalculation Date
 Freeze = Freeze Date

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R2T4 – SCHEDULED DAYS IN MODULES EXAMPLE 6

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R2T4 freeze date (Pell and DL recipient)
Each module is 4 weeks long



School does not have to do a Pell recalculation; loan funds do not have to be adjusted since student started a class and registered 1/2 time at time of disbursement
Though the student was only enrolled in coursework in module 1 as of the R2T4 freeze date, since the student attended at least one day in modules 1 and 2 but never attended module 3, *ONLY the days in module 1 and 2 ARE factored into the R2T4 calculation*

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

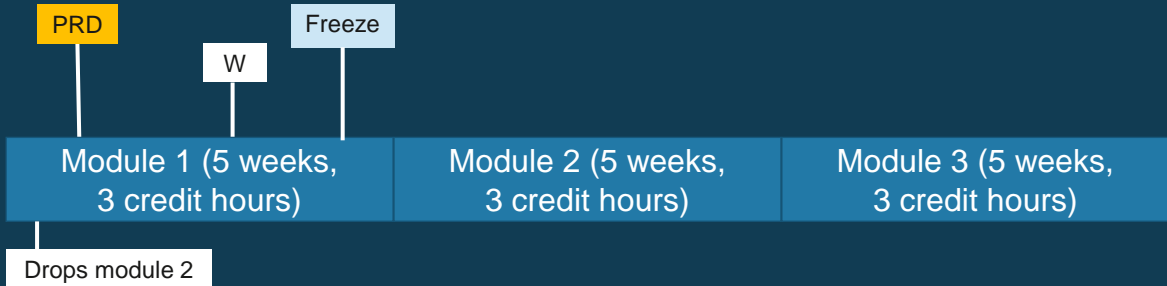
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R2T4 – SCHEDULED DAYS IN MODULES EXAMPLE 7

Federal Student Aid
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

R2T4 freeze date (Pell and DL recipient)
Each module is 5 weeks long



Student Enrolled in 3 credits in each modules 1, 2, and 3. A few days into Module 1, the student dropped the Module 2 course. She withdraws from the institution while still enrolled in module 1 and 3. The denominator will include modules 1 and 3.

W = Withdrawal PRD = Pell Recalculation Date Freeze = Freeze Date

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REMINDERS

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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

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R2T4 AND PELL GRANT RECALCULATION REMINDER

Student doesn't begin attendance in all classes in a term

- If a student does not begin attendance in all of his or her classes, resulting in a change in the student's enrollment status, the school must recalculate the Pell award based on the lower enrollment status
- Campus-Based awards must be recalculated based on the lower COA
- If a school learns a student did not begin attendance in all courses and an R2T4 calculation is required, FIRST perform the Pell recalculation and then include the adjusted Pell amount in the R2T4 calculation
 - The Pell recalculation is a separate and distinct process from the R2T4 calculation

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RESOURCES



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REFERENCES

Program Integrity Q & A website (Return of Title IV Funds topic)

<https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>

[August 20, 2021 Electronic Announcement](#)

SAP/R2T4 CARES Act provisions (May 15, 2020 electronic announcement)

<https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2020-05-15/updated-guidance-interruptions-study-related-coronavirus-covid-19-updated-june-16-2020>

Distance Education and Innovation Final Rule

<https://www.federalregister.gov/documents/2020/09/02/2020-18636/distance-education-and-innovation>

ANN-21-07

<https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2021-06-09/distance-education-and-innovation-regulatory-webinars-recordings-and-transcripts>

[Electronic Announcement dated January 15, 2021](#)

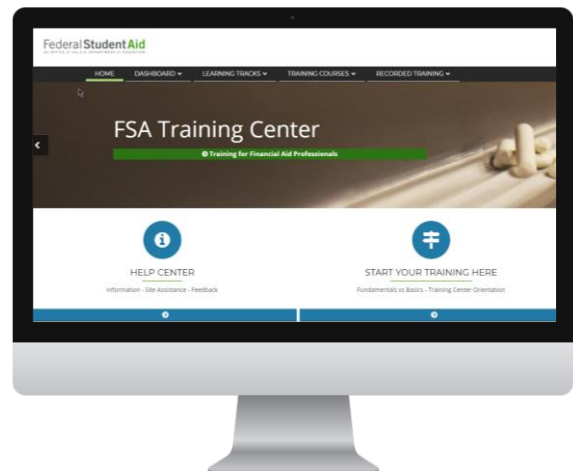
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FSA TRAINING CENTER

fsatraining.ed.gov

Check out learning tracks, software training, recorded policy videos here, and register for *FSA Fundamentals Training* series or *FSA Basics for New Staff* course.



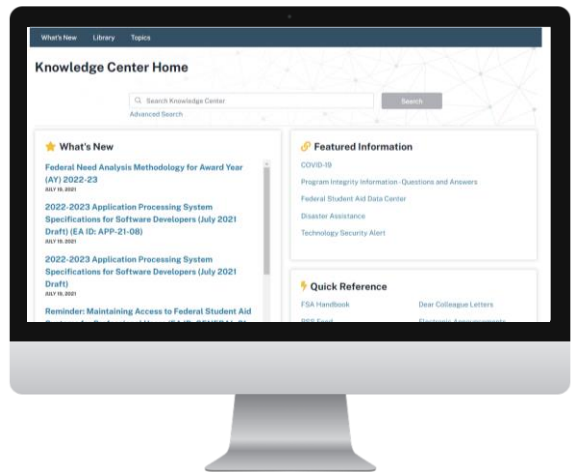
[Wednesday Webinars](#) January 14, 2022 ANN-22-01

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KNOWLEDGE CENTER

fsapartners.ed.gov/knowledge-center

IFAP is now the Knowledge Center! Subscribe for daily or weekly email updates.

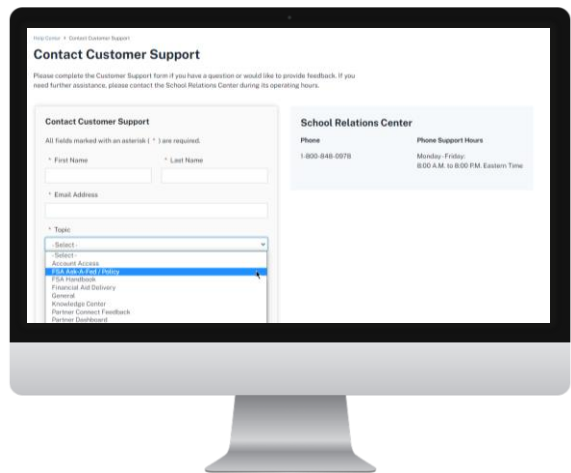


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GETTING HELP

fsapartners.ed.gov/help-center/

For policy questions, use *Contact Customer Support Form* in Help Center on FSA Partner Connect. Choose "Ask A Fed/Policy" in Topic dropdown list.



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TRAINING FEEDBACK

- All attendees receive email from FSA with link to online evaluation
 - Helps ensure quality training
 - Informs FSA of areas for improvement
 - Serves as effective tool for “listening” to our school partners

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THANK YOU!



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QUESTIONS

