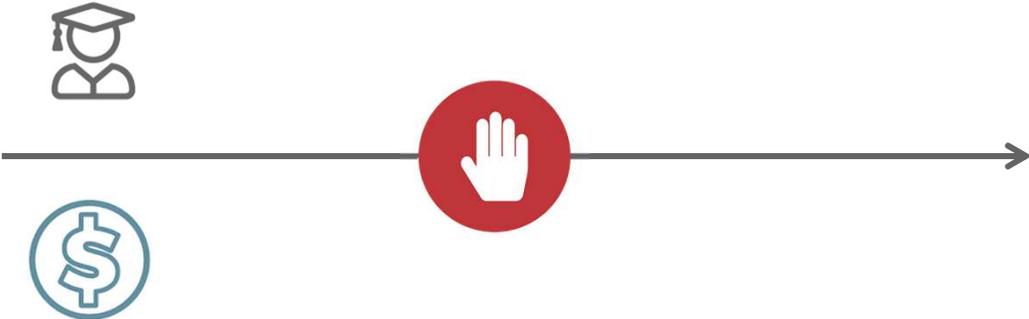


RETURN TO TITLE IV

NeASFAA Spring Conference
March 25, 2021

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BASICS



The diagram features a horizontal arrow pointing to the right. On the left side of the arrow, there are two icons: a graduation cap above a stylized figure, and a blue dollar sign below. In the center of the arrow, there is a red circle containing a white hand icon with fingers spread, positioned as if it is stopping the arrow.

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WHEN IT DOES NOT APPLY

Situation	Perform R2T4 Calculation	School Returns Funds	Student Returns Funds
Partial withdrawal	No	No	No
Did not establish Title IV eligibility	No	No	No
Deceased student	Yes	Yes	No
COVID-19	Yes	No	No

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DETERMINING
WITHDRAWAL DATE

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REQUIRED TO TAKE ATTENDANCE

Withdrawal date is always documented last date of academic attendance.

Includes

- Physically attending class
- Submitting an academic assignment
- Taking an exam
- Attending a study group assigned by the school
- Participating in academic discussion online
- Contacting faculty to ask academic questions

Does not include

- Living in institutional housing
- Using school's meal plan
- Participating in student-organized group
- Logging into an online course without active participation
- Participating in academic counseling or advising

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NOT REQUIRED TO TAKE ATTENDANCE

Official

- Earliest date
- Student begins official withdraw process
- Provides notification
- Documented last date of attendance

Unofficial

- Midpoint
- Last date of attendance in an academically related activity

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STEP 1

Include aid that was
disbursed and aid that
could have disbursed

STEP 1: Student's Title IV Aid Information			
	Amount Disbursed	Amount that Could Have Been Disbursed	
Title IV Grant Programs			
1. Pell Grant	[]	[]	E. Total Title IV aid disbursed for the period. A. [] + B. [] = E. \$ [] . []
2. FSEOG	[]	[]	
3. TEACH Grant	[]	[]	
4. Iraq and Afghanistan Service Grant	[]	[]	
A. Subtotal		C. Subtotal	
Title IV Loan Programs			
5. Unsubsidized Direct Loan	[]	[]	F. Total Title IV grant aid disbursed and that could have been disbursed for the period. A. [] + C. [] = F. \$ [] . []
6. Subsidized Direct Loan	[]	[]	
7. Direct Grad PLUS Loan	[]	[]	
8. Direct Parent PLUS Loan	[]	[]	
B. Subtotal		D. Subtotal	
G. Total Title IV aid disbursed and that could have been disbursed for the period. A. [] B. [] C. [] + D. [] = G. \$ [] . []			

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STEP 2

$$\text{Credit Hour} = \frac{\text{Days attended}}{\text{Days in period}}$$

$$\text{Clock Hour} = \frac{\text{Scheduled Hours at withdrawal}}{\text{Hours in period}}$$

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 Total days

- ▶ 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.** . %

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STEPS 3 & 4

Percentage completed × **Total aid** = **Earned aid**

Amount earned > amount disbursed = return to Ed

Amount earned < amount disbursed = PWD

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STEP 5

Institutional charges

- Tuition & fees, room & board
- Required course materials

Not Institutional charges

- Course materials that can be purchased outside of school
- Group health insurance fees
- Discretionary expenses, i.e. parking, library fines

STEP 5: Amount of Unearned Title IV Aid Due from the School		
L. Institutional charges for the period	Tuition	
	Room	
	Board	
	Other	
	Other	
Total Institutional Charges = L. \$		
<i>(Add all the charges together)</i>		
M. Percentage of unearned Title IV aid		
100% - <input type="text"/> % = M. %		
<small>Box H</small>		
N. Amount of unearned charges		
Multiply institutional charges for the period (Box L) by the percentage of unearned Title IV aid (Box M).		
<input type="text"/> x <input type="text"/> % = N. \$		
<small>Box L Box M</small>		
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. \$		

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STEP 6

Return in statutory order.
Loans, then grants.

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	<small>Amount for School to Return</small>
1. Unsubsidized Direct Loan	
2. Subsidized Direct Staff Loan	
3. Direct Grad PLUS Loan	
4. Direct Parent PLUS Loan	
Total loans the school must return = P. \$	
5 Pell Grant	
6 FSEOG	
7 TEACH Grant	
8 Iraq and Afghanistan Service Grant	

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REMAINING STEPS

Any remaining unearned funds that were disbursed are the responsibility of the student.

Remaining unearned Title IV loan funds must be repaid by the student in accordance with the terms of the loans.

Remaining unearned Title IV grant funds, if greater than 50% of the total grant assistance disbursed for the period, are considered grant overpayments. The institution must notify the student within 45 days of their obligation to repay those funds.

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R2T4 FOR
MODULES

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PROGRAMS OFFERED IN MODULES

Current Regs

Any program is “offered in modules” if a course or courses in the program do not span the entire length of the payment period or period of enrollment.

New Regs

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.

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EXCEPTIONS: NOT CONSIDERED WITHDRAWN IF

Current Regs

The institution obtains written confirmation that the student will attend a later module in the same payment period of period of enrollment.

New Regs

The institution obtains written confirmation that the student will attend a later module in the same payment period of period of enrollment;

The student completes the requirements for graduation;

The student completes one or more modules that, together, comprise at least 49% of the days in the payment period; or

The student completes coursework equal to or greater than the coursework required for half-time enrollment.

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EXAMPLE: ALEXIS ROSE

Alexis is enrolled 3 credit hours in the 1st module and 3 credit hours in the 2nd module.

Alexis successfully completes module 1, but after 6 days of attendance in module 2, she starts her PR business and withdraws.

Module 1	Break	Module 2
50 days	4 days	50 days

Successfully
completes



Withdraws

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IS ALEXIS CONSIDERED WITHDRAWN?

Old Regs

Yes. The student ceased attendance before completing the days that the student was scheduled to complete in Module 2.

New Regs

No. The student successfully completed Module 1, which included 49% or more of the days in the payment period.

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EXAMPLE: DAVID ROSE

David is enrolled in 6 credit hours in module 1, 3 credit hours in module 2, and not enrolled in module 3.

Schitt's Creek University defines half-time as 6 credit hours.

Module 1	Module 2	Module 3
30 days	30 days	30 days
Successfully completes	Never attends	

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IS DAVID CONSIDERED WITHDRAWN?

David successfully completed Module 1, never attended Module 2, and did not officially withdraw.

Old Regs

Yes. Upon ceasing attendance after completing Module 1, the student was still scheduled to attend days in Module 2.

New Regs

No. The student successfully completed 6 hours of coursework, which is the minimum required for half-time enrollment status.

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DAYS A STUDENT IS SCHEDULED TO COMPLETE

Current Regs

The number of days that a student is scheduled to complete includes days in all the classes in which the student is enrolled at the time the student ceases attendance.

New Regs

The number of days that a student is scheduled to complete includes days in all coursework used to determine the amount of the student's eligibility for Title IV funds for the payment period or period of enrollment.

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RESOURCES

NASFAA U Materials

2020 FSA Conference Breakout Session 18:

<https://fsaconferences.ed.gov/2020sessionlist.html>

Federal Register for regulatory changes:

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

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QUESTIONS?

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