

Federal Student Aid: R2T4 Policy

Overview

US Federal regulation specifies that if a student begins attendance, then withdraws or transfers from all eligible courses or ceases attendance at King's College London, King's must complete a **Return to Title IV (R2T4)** calculation and arrange for any *unearned* loan funds to be returned to the US Department of Education.

'Withdraw' is used in this document to mean complete withdrawal or transfer from an eligible course or a period of interruption.

Support with withdrawal or interruption

If a student is considering **withdrawing** from their course or **interrupting their studies**, they should consult the following guidance:

<https://self-service.kcl.ac.uk/article/KA-01765/en-us>

The above linked guidance also details other steps that students are encouraged to take, including speaking to their Personal Tutor.

For international students subject to immigration control, it is essential they [contact the Advice & Guidance Team](#) about how withdrawal/interruption affects their visa and right to remain in the UK.

Determining the date of withdrawal

If a student completes the formal withdrawal process their withdrawal will be calculated as of that date. Full details of the formal withdrawal process can be found here - <https://self-service.kcl.ac.uk/article/KA-01213/en-us>

USDE considers UK universities to be 'attendance taking', and as such US Federally funded students will be under heightened attendance monitoring. The way King's does this is by having each USDE funded student sign-in to a module on KEATS and confirm their ongoing engagement and attendance. This is a legally binding confirmation that requires the student to confirm their attendance on their course. If they fail to login to KEATS for 14 days this will trigger an **Unofficial Withdrawal** and suspend entitlement to US Federal Funding until the student re-engages with their course and the KEATS module. If a student is subject to an unofficial withdrawal in this way and subsequently re-gains eligibility, they will not be eligible for funding during the period deemed 'not in attendance'.

Calculation of Loan Entitlement following a withdrawal

If a student withdraws from their course or interrupts their studies, then King's will handle their loan funds in accordance with the regulations set out by the US Department of Education.

In the first instance we will use the US Federal Student Aid office's **RT24** form to calculate the amount of funds from the current disbursement period that will need to be returned.

The **R2T4** process will use the student's **last date of attendance** to calculate their entitlement to Federal Student Aid.

Attendance is calculated for the **payment period** during which the **withdrawal** occurs. A student *earns* aid for every day they attend, and any *unearned* aid must be returned. Attendance is calculated as the number of calendar days, including weekends, holidays and other non-study days the student is in attendance, but excludes any periods of more than five consecutive scheduled non-study days.

The university is responsible for returning any proportion of *unearned* funds it has received to the US Department of Education.

If you have attended for over **60%** of the current disbursement period, then no funds will be returned by the university.

The R2T4 requirement is independent of King's [tuition fee regulations](#) and your fee liability may be greater than your loan entitlement.

Payment Periods

The dates for the payment periods vary depending on your level of study.

Undergraduate

	Start	End	Total No. of Days	Scheduled Non-Study Days
Payment Period 1	29/Sep/2025	28/Jan/2026	122	20
Payment Period 2	29/Jan/2026	05/Jun/2026	128	24

Postgraduate

	Start	End	Total No. of Days	Scheduled Non-Study Days
Payment Period 1	29/Sep/2025	08/Jan/2026	102	20
Payment Period 2	09/Jan/2026	26/Apr/2026	108	24
Payment Period 3	27/Apr/2026	12/Jul/2026	77	0
Payment Period 4 (PG)	13/Jul/2026	28/Sep/2026	78	0

Number of days are calculated inclusive of start and end date.

Leave of Absences

The Title IV Leave of Absence policy is very specific; in order to be classed as on a leave of absence under Title IV regulations, a leave of absence can be no more than 180 days and the student must return to the exact same point that they were before the leave. As such, interruptions to study at King's do not satisfy the regulations. Any student interrupting their studies at King's will be reported as Withdrawn for that period and will be reported as in attendance again once they resume their studies.

Example Calculations

Tim

Tim enrolls on a postgraduate degree programme and withdraws from his studies on 4th November 2025.

The corresponding payment period runs from 29/Sep/2025 up until the day prior to his next payment period, 08/Jan/2026.

This represents 102 total days, however 20 scheduled non-study days (representing the Christmas break period) do not count towards the calculation.

This means that there are 82 days in the enrolment period that count towards the R2T4 Calculation. Tim has completed 37 days of study. Our calculation therefore looks like this:

$$37 \div 82 = 45\%$$

As Tim has earned entitlement for 45% of the payment period, this means that, assuming King's has disbursed 100% of the funds for the period, King's must return 55% of all the funds allocated to fees from his disbursement.

If King's has disbursed less than 45% of funds, then King's must offer Tim a post-withdrawal disbursement.

Daisy

Daisy enrolls on a postgraduate degree programme and withdraws from her programme on the 28th February 2026.

Her current payment period runs from 09/Jan/2026 to 26/Apr/2026 and includes 108 days. However, 24 scheduled non-study days (representing the Easter period) do not count towards the calculation.

This means that there are 84 days in the enrolment period that count towards the R2T4 Calculation. Daisy has been enrolled for 51 days at the point that she withdraws.

$$51 \div 84 = 61\%$$

As the number of days that Daisy has been enrolled is above the 60% threshold, no funds need to be returned as a result of the R2T4 calculation.

Order in Which US Loans are Returned

Loans are returned in the following order:

1. Unsubsidised Stafford
2. Subsidised Stafford
3. PLUS (Graduate or Parent)

Where a student receives notification that funds should be returned then they will do so via their loan servicer in accordance with the terms of the promissory note.

In the event a student **withdraws** from their studies, we will report them as **Withdrawn** via the National Student Loan Database. Please be aware

that loan repayment will be triggered 6 months after the date of a student's last day of study (in this case the date of their withdrawal).

An **R2T4** calculation will be performed within 30 days of the date that we determined a student withdrew from their programme of study.

Any funds that King's has allocated to fees from the student's disbursement and that must now be returned will be returned within 45 days.

Once King's has performed the R2T4 Calculation, we will provide students with an email confirming:

- The amount of unearned aid that we will return to the USDE
- The amount of unearned aid that the student must arrange to return via their loan servicer
- The amount of any tuition fees owing that have not been covered by the R2T4 process

Post-Withdrawal Disbursement

Where a student withdraws from their programme prior to their Title IV funds being disbursed, if Title IV funds could have been disbursed (i.e. the date of the student's withdrawal means that they retain some entitlement to their disbursement) then King's will determine the amount of the funds earned by the student.

A written post-withdrawal disbursement notification must be offered to the student within 30 days of the date that King's determined the student withdrew. The notification will:

- Identify the type and amount of funds
- Include the option to accept or decline some or all funds
- Explain your obligation to repay any loan funds disbursed
- Provide a deadline to respond

We must receive a confirmation from the student or borrower within 14 days of the notification, prior to releasing the disbursement. If received after the deadline, King's may choose to honour a late response.

If a student withdraws and there is a credit balance on their account, King's will hold the credit balance until R2T4 is completed.

Reducing Course-Load

Where a student reduces their course-load, for example, by transferring from a full-time mode of attendance to a part-time mode of attendance of at least 50% intensity, the student will not be

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considered withdrawn. If the student transfers to a course delivered by telecommunications – Distance Learning – then they will be considered withdrawn.