

TREATMENT OF TITLE IV FUNDS WHEN A STUDENT WITHDRAWS RETURN TO TITLE IV FUNDS (R2T4) POLICY

When a student applies for financial aid, a statement is signed that the funds will be used for educational purposes only. Therefore, if a student withdraws before completing the program, a portion of the funds received may have to be returned. The College will calculate the amount to be returned to the Title IV, HEA (Higher Education Act) Federal fund programs according to the policies listed below.

This policy applies to students who **withdraw officially, unofficially or fail to return from a leave of absence or are dismissed from enrollment** at the College. It is separate and distinct from the College refund policy. (Refer to institutional refund policy)

The calculated amount of the Return of Title IV, HEA (R2T4) funds that are required to be returned for the students affected by this policy, are determined according to the following definitions and procedures as prescribed by regulations.

The amount of Title IV, HEA aid earned is based on the amount of time a student spent in academic attendance, and the total aid received; it has no relationship to student's incurred institutional charges. Because these requirements deal only with Title IV, HEA funds, the order of return of **unearned** funds do not include funds from sources other than the Title IV, HEA programs.

Title IV, HEA funds are awarded to the student under the assumption that he/she will attend school for the entire period for which the aid is awarded. When a student withdraws, he/she may no longer be eligible for the full amount of Title IV, HEA funds that were originally scheduled to be received. Therefore, the amount of Federal funds earned must be determined. If the amount disbursed is greater than the amount earned, unearned funds must be returned.

The Payment Period for Clock Hour Schools is one-half of the academic year or program length (whichever is less). The Payment Period for a Credit Hour school is one semester.

The Date of Determination is the date that the institution determines is the withdrawal date. For schools that are required to take attendance, the date of determination is no longer than 14 days after the Last Date of Attendance. The Date of Determination starts the clock for timely refunds of Title IV funds, within 45 days after the "Date of Determination".

The Withdrawal Date for schools required to take attendance is the Last Date of Attendance (LDA).

The college has 45 days from the date that the college determines that the student withdrew to return all unearned funds for which it is responsible. The college is required to notify the student if they owe a repayment via written notice. The school must advise the student or parent that they have 14 calendar days from the date that the school sent the notification to accept a post withdraw disbursement. If a response is not received from the student or parent within the allowed time frame or the student declines the funds, the college will return any earned funds that the school is holding to the Title IV, HEA programs.

Post-withdraw disbursements will occur within 90 days of the date that the student withdrew.

WITHDRAWAL POLICY

“Official” Voluntary Withdrawal

A student is considered to be “Officially” withdrawn on the date the student notifies the Financial Aid Director or Chief Executive Officer in writing of their intent to withdraw. The date of the termination for return and refund purposes will be the earliest of the following for official withdrawals:

1. Date student provided official notification of intent to withdraw, in writing. or
2. The date the student began the withdrawal from the school’s records.

A student will be permitted to rescind his notification in writing and continue the program, if so chosen. However, if the student subsequently drops, the student’s withdrawal date is the original date of notification of intent to withdraw.

Upon receipt of the withdrawal information the school will complete the following:

1. Determine the student’s last date of attendance as of the last recorded date of academic attendance on the school’s attendance record, and 2. Perform two calculations
 - a. The student’s transcript and attendance record are reviewed to determine the calculation of Return of Title IV, HEA funds the student has earned, and if any, the amount of Title IV, HEA funds for which the school is responsible. Returns made to the Federal Funds Account are calculated using the Department’s Return of Title IV, HEA Funds Worksheets, scheduled attendance and are based upon the payment period.
 - b. Calculate the school’s refund requirement (see school refund calculation).
3. The student’s grade record will be updated to reflect his/her final grade.
4. The school will return the amount for any unearned portion of the Title IV, HEA funds for which the school is responsible within 45 days of the date the official notice was provided.
5. If applicable, the school will provide the student with a letter explaining the Title IV, HEA requirements. To include,
 - a. The amount of Title IV, HEA assistance the student has earned. This amount is based upon the length of time the student was enrolled in the program based on scheduled attendance and the amount of funds the student received.
 - b. Any returns that will be made to the Federal program on the student’s behalf as a result of exiting the program. If a student’s scheduled attendance is more than 60% of the payment period, he/she is considered to have earned 100% of the Federal funds received for the payment period. In this case, no funds need to be returned to the Federal funds.
 - c. Advise the student of the amount of unearned Federal funds and tuition and fees that the student must return, if applicable.
6. Supply the student with ledger card record noting outstanding balance due to the school and the available methods of payment. A copy of the completed worksheet, check, letter and final ledger card will be kept in the student’s file.

In the event a student decides to rescind his or her official notification to withdraw, the student must provide a signed and dated written statement indicating he/she is continuing his or her program of study and intends to complete the payment period. Title IV, HEA assistance will continue as originally planned. If the student subsequently fails to attend or ceases attendance without completing the payment period, the student's withdrawal date is the original date of notification of intent to withdraw.

Unofficial Withdrawal

Any student that does not provide official notification of his or her intent to withdraw and is absent for more than 14 consecutive calendar days, fails to maintain satisfactory academic progress, fails to comply with the school's attendance and /or conduct policy, does not meet financial obligations to the school, or violates conditions mentioned in the School contractual agreement, will be subject to termination and considered to have unofficially withdrawn.

Within two weeks of the student's last date of academic attendance, the following procedures will take place.

1. The Registrar office will make three attempts to notify the student regarding his/her enrollment status.
2. Determine and record the student's last date of attendance as the last recorded date of academic attendance on the attendance record.
3. The student's withdrawal date is determined as the date the day after 14 consecutive calendar days of absence.
4. Notify the student in writing of their failure to contact the school and attendance status resulting in the current termination of enrollment.
5. The school calculates the amount of Federal funds the student has earned, and, if any, the amount of Federal funds for which the school is responsible.
6. Calculate the college's refund requirement (see school refund calculation).
7. The College's Director of Financial Aid will return to the Federal fund programs any unearned portion of Title IV funds for which the college is responsible within 45 days of the date the withdrawal determination was made, and record on student's ledger card.
8. If applicable, the College will provide the student with a refund letter explaining Title IV requirements:
 - a. The amount of Title IV aid the student has earned based upon the length of time the student was enrolled and scheduled to attend in the program and the amount of aid the student received.
 - b. Advise the student in writing of the amount of unearned Title IV, HEA aid and tuition and fees that he/she must return, if applicable.
9. Supply the student with final student ledger card showing outstanding balance due the school and available methods of repayment.
10. A copy of the completed worksheet, check, letter, and final ledger card will be kept in the student's file.

Withdraw Before 60%

The institution must perform a R2T4 to determine the amount of earned aid through the 60% point in each payment period. The institution will use the Department of Education's prorate schedule to determine the amount of the R2T4 funds the student has earned at the time of withdrawal.

Withdraw After 60%

After the 60% point in the payment period, a student has earned 100% of the Title IV, HEA funds he or she was scheduled to receive during this period. The institution must still perform a R2T4 to determine the amount of aid that the student has earned.

The college measures progress in semester credits and uses the payment period for the period of calculation.

The Calculation Formula:

Determine the amount of Title IV, HEA aid that was disbursed plus Title IV, HEA aid that could have been disbursed.

Calculate the percentage of Title IV, HEA aid earned:

- a) Credit Hour Program: Divide the number of calendar days completed in the period by the total number of calendar days in the period

$$\frac{\text{NUMBER OF CALENDAR DAYS COMPLETED}}{\text{TOTAL NUMBER OF CALENDAR DAYS IN THE PERIOD}}$$

Scheduled breaks of at least five consecutive days and days student was on an approved LOA are excluded.

- b) If this percentage is greater than 60%, the student earns 100%.
c) If this percentage is less than or equal to 60%, proceeds with calculation.

Percentage earned from (multiplied by) Total aid disbursed or could have been disbursed = AMOUNT STUDENT EARNED.

Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED.

100% minus percent earned = UNEARNED PERCENT

Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM THE SCHOOL.

If the percent of Title IV aid disbursed is greater than the percent unearned (multiplied by) institutional charges for the period, the amount disbursed will be used in place of the percent unearned.

If the percent unearned (multiplied by) institutional charges for the period are less than the amount due from the school, the student must return or repay one-half of the remaining unearned Federal Pell Grant.

Student is not required to return the overpayment if this amount is equal to or less than 50% of the total grant assistance that was disbursed /or could have been disbursed. The student is also not required to return an overpayment if the amount is \$50 or less.

The College will issue a grant overpayment notice to student within 30 days from the date the school's determination that student withdrew, giving student 45 days to either:

1. Repay the overpayment in full to the Eastern School of Acupuncture and Traditional Medicine
- OR
2. Sign a repayment agreement with the U.S. Department of Education.

Order of Return

The College is authorized to return any excess funds after applying them to current outstanding Cost of Attendance (COA) charges. A copy of the Institutional R2T4 work sheet performed on your behalf is available through the office upon student request.

In accordance with Federal regulations, when Title IV, HEA financial aid is involved, the calculated amount of the R2T4 Funds" is allocated in the following order:

- Unsubsidized Direct Stafford loans (other than PLUS loans)
- Subsidized Direct Stafford loans
- Direct PLUS loans
- Federal Pell Grants for which a Return is required
- Federal Supplemental Educational Opportunity Grant
- Iraq and Afghanistan Service Grant for which a Return is required
- Other Title IV assistance
- State Tuition Assistance Grants (if applicable)
- Private and institutional aid
- The Student

Earned AID:

Title IV, HEA aid is earned in a prorated manner on a per diem basis (clock hours) up to the 60% point in the semester. Title IV, HEA aid is viewed as 100% earned after that point in time. A copy of the worksheet used for this calculation can be requested from the Director of Financial Aid.

Post Withdraw

If you did not receive all of the funds that you have earned, you may be due a post-withdraw disbursement. The College may use a portion or all of your post- withdraw disbursement for tuition and fees (as contracted with the College). For all other college charges, the College needs your permission to use the post-withdraw disbursement. If you do not give permission, you will be offered the funds. However, it may be in your best interest to allow the school to keep the funds to reduce your debt at the school.

The post-withdrawal disbursement must be applied to outstanding institutional charges before being paid directly to the student.

Institution Responsibilities

The College's responsibilities in regard to Title IV, HEA funds follow:

- Providing students information with information in this policy.
- Identifying students who are affected by this policy and completing the return of Title IV funds calculation for those students.
- Returning any Title IV, HEA funds due to the correct Title IV programs.

The college is not always required to return all of the excess funds; there are situations once the R2T4 calculations have been completed in which the student must return the unearned aid.

Overpayment of Title IV, HEA Funds

Any amount of unearned grant funds that a student must return is called an overpayment. The amount of grant overpayment that you must repay is half of the grant funds you received. You must make arrangements with the College or Department of Education to return the amount of unearned grant funds.

Student Responsibilities in regard to return of Title IV, HEA funds

- Returning to the Title IV, HEA programs any funds that were dispersed to the student in which the student was determined to be ineligible for via the R2T4 calculation.
- Any notification of withdrawal should be in writing and addressed to the appropriate institutional official.
- A student may rescind his or her notification of intent to withdraw. Submissions of intent to rescind a withdraw notice must be filed in writing.
- Either these notifications, to withdraw or rescind to withdraw must be made to the official records/registrar personnel at your school.

Refund vs. Return to Title IV

The requirements for the Title IV, HEA program funds when you withdraw are separate from any refund policy that The School may have to return to you due to a cash credit balance. Therefore, you may still owe funds to the school to cover unpaid institutional charges. The College may also charge you for any Title IV, HEA program funds that they were required to return on your behalf.

If you do not already know what the College Refund policy is, you may ask your Director of Financial Aid a copy.

Return to Title IV questions

If you have questions regarding Title IV, HEA program funds after visiting with your Director of Financial Aid, you may call the Federal Student Aid Information Center at 1-800-4-fedaaid (800-433-3243). TTY users may call 800-730-8913. Information is also available on student aid on the web www.studentaid.ed.gov.

This policy is subject to change at any time, and without prior notice.