CATEGORY: STUDENTS – TITLE IV RECIPIENTS  
SUBJECT: RETURN OF TITLE IV FUNDS POLICIES AND PROCEDURES

General Policy – It is the policy of the College of Nursing and Health Professions (CNHP) to follow the Federal requirements of 34 CFR 668.22 as explained in this document.  
The return of Title IV (R2T4) funds requirements apply to a Title IV grant or loan recipient who withdraws from or leaves school before completing the payment period or period of enrollment. The requirements do not apply to students who never actually begin attendance in classes or to students for whom attendance in at least one class during a payment period or period of enrollment cannot be documented.

Procedures -- CNHP is not required to take attendance, and in the case of withdrawals, the official withdrawal date is the date the student began the withdrawal process. For unofficial withdraws

Students wishing to withdraw from the College should contact their Academic Advisor and the Director, and must submit a letter of resignation to the Registrar. Withdrawal is not considered official until the dated letter of resignation is filed with the Registrar. Until such filing, the student remains enrolled in the College and is responsible for fulfilling its academic and financial requirements.

At CNHP, the following offices are responsible to coordinate the withdrawal process:

- The Registrar’s Office is the designated contact point for students who choose to withdraw. The student may contact the university in person or via electronic mail.
- The Financial Aid Office is responsible to perform the R2T4 calculations and to notify the student accounts office of appropriate adjustments to the student’s account.
- The student accounts staff is responsible to return any unearned Title IV funds to the Federal Government.

A student’s aid is posted to his or her account at the beginning of each period, and the student earns the funds as they complete the period. If the student withdraws during the payment period, the amount of Title IV aid earned by the student up to that point is determined by a formula on a pro rata basis. If the student receives excess program
funds that must be returned, CNHP will calculate the portion to be returned to the Federal Government. The portion to be returned will be equal to the lesser of:

Institutional charges X the unearned % of the funds, or
The entire amount of excess funds

Official Withdrawals

The following procedures are in place at CNHP for official withdrawals:

1. The student notifies the CNHP Registrar’s Office of an intent to withdraw.
   a. CNHP may allow a student to rescind his or her official notification to withdraw by filing a written statement that he or she is continuing to participate in academically related activities and intends to complete the payment period or period of enrollment.

2. The Registrar notifies the Financial Aid and Student Account’s Offices of the student’s withdrawal and the official withdrawal date, to be used in the R2T4 calculation.

3. If the student had federal financial aid (Title IV aid), the R2T4 calculation is performed.
   a. The college is required to determine the amount of Title IV aid that a student has earned if he or she withdraws. Within 30 days, the college will calculate the amount of Title IV aid that a student has earned based on the payment period or period of enrollment. The student will be obligated for any tuition, fees, books or equipment not covered by Title IV funds.
   b. The amount of assistance that a student has earned is determined on a pro-rata basis. That is, if 25 percent of the payment period has been completed, the student has earned 25 percent of the assistance that he or she was originally scheduled to receive for the payment period. Once a student has completed more than 60 percent of the payment period, he or she will be considered to have earned all of the Title IV aid.
   c. If a student has received more assistance than he or she has earned, the excess funds must be returned.
   d. If the student has received (or the college received it on his or her behalf) less assistance than the amount earned for the payment period, he or she will be able to receive those additional funds through a post-withdrawal disbursement.
      i. If the student has grant eligibility due to a post withdrawal disbursement, the school will process the grant funds and post to the student account.
ii. If the student has loan eligibility due to a post withdrawal, CNHP will offer the loan(s) post withdrawal and will not process until the student and/or parent has accepted the all or a portion of the loan within 30 days of the school sending notification. Once the school has the signed acceptance from the student, CNHP will process the loans and post to the student account within the timeframes allowed. If the school does not receive notification back from the student, CNHP will not process the loan and it will not be credited to the student account. Any unclaimed post withdrawal loan funds will be sent back to the Federal loan program.

4. If the R2T4 calculation results indicate that the student received more TIV assistance than they earned, funds are returned to the Education Department using the electronic refund functionality in G5. If the R2T4 calculation results indicate that the student received less TIV assistance than he or she earned, a post-withdrawal disbursement is arranged.

a. The conditions and limitations for a post-withdrawal disbursement are the same as for all other late disbursements. However, there are additional requirements for late disbursements made as post-withdrawal disbursements. CNHP follows the rules for paying and/or offering a post-withdrawal disbursement in regulations governing the Return of Title IV Funds. From the date CNHP determined that a student withdrew, grants are returned as soon as possible, but not later than 45 days.

b. Although CNHP must make or offer late disbursements, a student is never required to accept it, particularly loans. For example, a student may decline a late disbursement of a loan to avoid taking on additional debt.

c. The regulations prohibit CNHP from making a late disbursement in certain situations, even if a student otherwise meets the conditions for a late disbursement. CNHP will not make a:

   i. Late second or subsequent disbursement of Direct Loan funds unless the student has graduated or successfully completed the loan period;

   ii. Late disbursement of Direct Loan funds to a first-year, first-time borrower who withdraws before the 30th day of the student’s program of study (unless the school meets the requirements for a waiver based on low default rates).

   iii. Late disbursement later than 180 days after the date the student becomes ineligible.

   iv. Late disbursement of a grant later than 45 days after learning of a student’s withdrawal.
5. The student is notified of the action(s) taken.
   a. Borrowers who withdraw from school will receive exit interview information.

**Determining Unofficial Withdrawals**

CNHP assumes that the student has unofficially withdrawn if:

- they began attendance at CNHP and
- did not officially withdraw and
- failed to earn a passing grade in at least one course during an entire period

This policy and related procedures are required under the federal Title IV student financial aid programs.

CNHP has policies and procedures to identify and timely perform R2T4 calculations for unofficial withdrawals. This requires the collaboration of a number of different areas on campus, including faculty. The policy accounts for:

1. A student has attended at least one class day.
   A: Prior to performing an R2T4 calculation for an unofficial withdrawal, the college will document that the student attended at least one class day of the course for which the student received a non-passing grade. CNHP cannot assume that the student began attendance in a class simply because the student was registered in the course.

2. Determining the difference between an earned non-passing grade and an unearned non-passing grade.

The following procedures are in place at CNHP for tracking unofficial withdrawals:

1. At the end of each semester, the Financial Aid Office (FAO) runs a query of all Title IV aid recipients with all non-passing grades for the enrollment period.

2. Registrar's Office reviews the student's files and communicates with faculty as needed to determine if the student had any academic-related activity for the semester and to determine the last date of attendance, or last day of academic-related activity, if available. The list is updated and returned to the FAO for follow-up.

3. The FAO uses the last date of attendance or last day of academic-related activity, if available, or uses the 50 percent of the period date as the withdrawal date, whichever is appropriate.

4. The FAO performs the R2T4 calculations

5. Adjustments are made in SONIS by the FAO.
6. The students are notified in writing of all returns and any obligations required by the student with instructions.

7. The Student Accounts staff is notified of any refunds that need to be returned, and returns the unearned funds no later than 45 days after CNHP determines the student withdrew.

8. The Student Accounts office adjusts the student's account for all title IV fund reduction.
# Treatment Of Title IV Funds When A Student Withdraws From A Credit-Hour Program

### STEP 1: Student's Title IV Aid Information

<table>
<thead>
<tr>
<th>Title IV Grant Programs</th>
<th>Amount Disbursed</th>
<th>Amount that Could Have Been Disbursed</th>
<th>Total Title IV aid disbursed for the period</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Pell Grant</td>
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<tr>
<td>2. Academic Competitiveness Grant</td>
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<td></td>
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<tr>
<td>3. National SMART Grant</td>
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<tr>
<td>4. FSEOG</td>
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<tr>
<td>5. TEACH Grant</td>
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<tr>
<td>6. Iraq Afghanistan Service Grant</td>
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<tr>
<td><strong>A.</strong> Subtotal</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Title IV Loan Programs</th>
<th>Net Amount Disbursed</th>
<th>Net Amount that Could Have Been Disbursed</th>
<th>Total Title IV aid disbursed and that could have been disbursed for the period</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Unsubsidized FFEL/Direct Stafford Loan</td>
<td></td>
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<td></td>
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<tr>
<td>8. Subsidized FFEL/Direct Stafford Loan</td>
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<tr>
<td>9. Perkins Loan</td>
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<tr>
<td>10. FFEL/Direct PLUS (Graduate Student)</td>
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<tr>
<td>11. FFEL/Direct PLUS (Parent)</td>
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<tr>
<td><strong>B.</strong> Subtotal</td>
<td></td>
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</tr>
</tbody>
</table>

### STEP 2: Percentage of Title IV Aid Earned

<table>
<thead>
<tr>
<th>Start date</th>
<th>Scheduled end date</th>
<th>Date of withdrawal</th>
</tr>
</thead>
</table>

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).

\[
\text{Completed days} \div \text{Total days} = \%\%
\]

- 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.

### 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).

\[
\% \times \text{Box H} = \text{Box G}
\]

### 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.

\[
\text{Box I} - \text{Box E} = \text{J. $}
\]

Stop here, and enter the amount in "J" in Box 1 on Page 3 (Post-withdrawal disbursement tracking sheet).

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You should use this form when the withdrawal date is on or after 7/1/2010
<table>
<thead>
<tr>
<th>Student's Name</th>
<th>Social Security Number</th>
</tr>
</thead>
</table>

**STEP 4: Aid to be Disbursed or Returned CONTINUED**

**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.

\[
\text{Box E} - \text{Box I} = \text{K.} $?
\]

**STEP 5: Amount of Unearned Title IV Aid Due from the School**

**L. Institutional charges for the period**

<table>
<thead>
<tr>
<th>Tuition</th>
<th>Room</th>
<th>Board</th>
<th>Other</th>
</tr>
</thead>
</table>

**Total Institutional Charges**

\[
\text{Total Institutional Charges} = \text{L.} $?
\]

**M. Percentage of unearned Title IV aid**

\[
100\% - \% = \text{M.} \%
\]

**N. Amount of unearned charges**

Multiply institutional charges for the period (Box L) by the percentage of unearned Title IV aid (Box M).

\[
\text{Box L} \times \% = \text{N.} $?
\]

**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.

\[
\text{O.} $?
\]

**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**

1. Unsubsidized FFEL/Direct Stafford Loan
2. Subsidized FFEL/Direct Stafford Loan
3. Perkins Loan
4. FFEL/Direct PLUS (Graduate Student)
5. FFEL/Direct PLUS (Parent)

\[
\text{Total loans the school must return} = \text{P.} $?
\]

6. Pell Grant
7. Academic Competitiveness Grant
8. National SMART Grant
9. FSEOG
10. TEACH Grant
11. Iraq Afghanistan Service 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).

\[
\text{Box K} - \text{Box O} = \text{Q.} $
\]

**STEP 8: Repayment of the Student's loans**

From the Net loans disbursed to the student (Box B) subtract the Total loans the school must return (Box P) to find the amount of Title IV loans the student is still responsible for repaying (Box R).

These loans consist of loans the student has earned, or unearned loan funds the school is not responsible for repaying. They are repaid to the loan holders according to the terms of the borrower's promissory note.

\[
\text{Box B} - \text{Box P} = \text{R.} $
\]

**STEP 9: Grant Funds to be Returned**

**S. Initial amount of Title IV grants for student to return**

From the initial amount of unearned Title IV aid due from the student (Box Q) subtract the amount of loans to be repaid by the student (Box R).

\[
\text{Box Q} - \text{Box R} = \text{S.} $
\]

**T. Amount of Title IV grant protection**

Multiply the total of Title IV grant aid that was disbursed and that could have been disbursed for the period (Box F) by 50%.

\[
\text{Box F} \times 50\% = \text{T.} $
\]

**U. Title IV grant funds for student to return**

From the Initial amount of Title IV grants for student to return (Box S) subtract the Amount of Title IV grant protection (Box T).

\[
\text{Box S} - \text{Box T} = \text{U.} $
\]

**STEP 10: Return of Grant Funds by the Student**

Except as noted below, the student must return the unearned grant funds for which he or she is responsible (Box U). The grants returned by the student are applied in order as indicated, up to the amount disbursed from that grant program minus any grant funds the student 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**

1. Pell Grant
2. Academic Competitiveness Grant
3. National SMART Grant
4. FSEOG
5. TEACH Grant
6. Iraq Afghanistan Service Grant

You should use this form when the withdrawal date is on or after 7/1/2010 p. 2 of 3
POST-WITHDRAWAL DISBURSEMENT TRACKING SHEET

Student's Name ________________________________ Social Security Number ________________________________

Date of school's determination that student withdrew ____________________

I. Amount of Post-withdrawal Disbursement (PWD)

Amount from "Box J" of the Treatment of Title IV Funds When a Student Withdraws worksheet Box 1 $ .

II. Outstanding Charges For Educationally Related Expenses Remaining On Student's Account

Total Outstanding Charges Scheduled to be Paid from PWD (Note: Prior-year charges cannot exceed $200.) Box 2 $ .

III. Post-withdrawal Disbursement Offered Directly to Student and/or Parent

From the total Post-withdrawal Disbursement due (Box 1), subtract the Post-withdrawal Disbursement to be credited to the student's account (Box 2). This is the amount you must make to the student (grant) or offer to the student or parent (Loan) as a Direct Disbursement.

\[ \text{Box 1} \ - \ \text{Box 2} = \text{Box 3} \]

IV. Allocation of Post-withdrawal Disbursement

<table>
<thead>
<tr>
<th>Type of Aid</th>
<th>Loan Amount School Seeks to Credit to Account</th>
<th>Loan Amount Authorized to Credit to Account</th>
<th>Title IV Aid Credited to Account</th>
<th>Loan Amount Offered as Direct Disbursement</th>
<th>Loan Amount Accepted as Direct Disbursement</th>
<th>Title IV Aid Disbursed Directly to Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pell Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>ACG</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>National SMART Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>FSEOG</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>TEACH Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Iraq Afghanistan Svc. Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<td>Perkins</td>
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<tr>
<td>Subsidized FFEL / Direct</td>
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<tr>
<td>Unsubsidized FFEL / Direct</td>
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<tr>
<td>FFEL / Direct Grad Plus</td>
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<tr>
<td>FFEL / Direct Parent Plus</td>
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<tr>
<td>Totals</td>
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</tbody>
</table>

V. Authorizations and Notifications

Post-withdrawal disbursement loan notification sent to student and/or parent on ____________________

Deadline for student and/or parent to respond ____________________

☐ Response received from student and/or parent on ____________________

☐ Response not received

☐ School does not accept late response

VI. Date Funds Sent

Date Direct Disbursement mailed or transferred Grant $ . Loan $ .

You should use this form when the withdrawal date is on or after 7/1/2010