



The College at  
**Southeastern**

## **Return to Title IV Policy**

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A crucial part of processing Title IV, HEA funds is the Return to Title IV (R2T4) Process. The Federal government requires that if a student completely withdraws, officially or unofficially, from a payment period in which he or she is receiving Title IV funds, the school must calculate how much of the award the student has earned and return the remaining amount to the department through G5.

### **i. Payment Periods**

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- The College at Southeastern contains three payment periods: fall, spring, and summer.
  - For the fall term, the start date and end date of the term are determined by the academic calendar. The academic period ends on the final day of classes. There are two instructional breaks of nine days (a full week, plus the weekend before and after) during the Fall semester—Fall Break and Thanksgiving Recess—which must be subtracted from the total number of calendar days to determine the total number of instructional days in the payment period.
  - For the spring term, there is a winter intersession and spring semester which make up a single payment period. The winter intersession term is treated as a module for R2T4 purposes. The start date and end date of each term are defined by the academic calendar. The academic period ends on the last day of classes. The winter intersession contains no scheduled breaks of more than five days. There are two instructional breaks of nine days (a full week, plus the weekend before and after) during the Spring semester—Spring Break and Easter Break—which must be subtracted from the total number of calendar days to determine the total number of instructional days in the payment period.
    - If a student enrolled in classes in the winter intersession ceases attendance in all classes in the winter intersession, she must indicate that she will be taking classes in the Spring session in writing or else she will be treated as a withdrawal for the entire spring term.
- The summer term is composed of four modules, as well as classes that cover the entire term. The summer term does not contain any scheduled breaks of greater than five days.
  - If a student enrolled in classes in any of the summer modules ceases attendance in all their classes and has not already completed a modular class or is not enrolled in a class covering the entire summer term, he must indicate that he will be taking classes in one of the later summer modules in writing or else he will be treated as a withdrawal for the entire summer term.

### **ii. Withdrawal Policy**

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- In order to withdraw from enrollment, a student must consult the Registrar, obtain certain required approvals, return all materials on loan to the Library, and clear their accounts with the Accounting Services office. A Withdrawal Form is available online via CampusNet. Students whose withdrawals are completed before the final drop date will receive a reversal of fees. Students who have not completed requirements for a degree and who do not plan to enroll for the following term are required to withdraw from enrollment through the withdrawal procedure.
  - Additionally, a student may initiate the withdrawal process by contacting the Coordinator of Student Success, the Assistant Registrar for the College at Southeastern, or the Director or Assistant Director of Student Resources & Financial Aid. This contact can be in written form or by way of conversation while they are acting in their official capacity as employees of the institution. An official withdrawal is finalized by completing the process outlined in the previous paragraph.
- Unofficial withdrawals: Students are considered to have unofficially withdrawn when they cease attendance or

academic engagement in all their classes, so that they do not complete the course requirements. Professors who choose to assign failing grades due to a lack of academic engagement will assign the grade of FI. Students who earn all FIs are considered unofficially withdrawn. Students who indicate their intention to withdraw to an employee of the Registrar's Office, Student Life & Financial Aid Office, or Student Success who is acting in their official capacity but never officially complete the withdrawal process, are also considered to have unofficially withdrawn.

- If a student remains enrolled in only non-Title IV eligible classes, the student is considered withdrawn for Title IV purposes, and The College at Southeastern will initiate the R2T4 process.

- In other words, any student who fails to receive a passing grade or an earned F in any of their classes in a term is considered to have withdrawn from that term. At this point, the institution will review the student's academic activity in order to determine the withdrawal date for R2T4 calculations.

### **iii. Students Who Do Not Begin Attendance in Classes**

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- If a student does not begin attendance in at least one class that is eligible for Title IV funds in a payment period, he is not eligible for any federal funds. The College at Southeastern will return all the funds for that student as soon as possible, but no later than 30 days from the date of determination that the student did not begin classes.

- If a student does not begin attendance in a given class during a payment period, then he is not eligible for the funding allocated for that class. The College at Southeastern will adjust the Pell Grant award to reflect their new enrollment status. The additional funds will be returned within 30 days from the date of determination that the student did not begin a class.

### **iv. Leave of Absence Policy**

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- The College at Southeastern currently does not have an official Leave of Absence policy.

### **v. Date of Withdrawal and Date of Determination**

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- The College at Southeastern does not require professors to take attendance. The dates of withdrawal and determination will be established as follows:

- Each on-campus course at the College at Southeastern will record student attendance for every meeting during the first two weeks of every semester and intercession. This attendance record will be one method by which Southeastern will acquire official documentation from professors that students have begun a course in accordance with Title IV requirements. Alongside this attendance procedure, Southeastern will also use any additional evidence of academic engagement (e.g. completed quizzes or submitted assignments) to confirm a student has started his or her scheduled courses in these first two weeks. Should a professor have no record of attendance for this period, and no other documentation can be acquired to verify a student started the course, the student will be considered to have never attended for the purposes of Title IV funding. At that point, the Financial Aid Office will adjust the student's Title IV funding to reflect his or her new enrollment status.

- Each distance learning class at the College at Southeastern will have two attendance checkpoints. By the end of the second week of each session, each class will contain an on-line quiz through Moodle that students will be required to complete. This quiz will be one means used to verify that a student has begun attendance in a class. Additionally, during the Fall and Spring sessions, each class will contain an on-line quiz through Moodle by the end of the 9th week that students should complete. This quiz will be one means used to verify that a student has completed more than 60% of their courses.

- These quizzes will be one means used to help demonstrate whether students have unofficially withdrawn. However, failure to take one or both quizzes will not immediately result in a student being labeled as unofficially withdrawn if other forms of academic engagement can be demonstrated.

- For students who initiate an official withdrawal, either by filling out the withdrawal form or by indicating their intention to withdraw, either in writing or verbally, to Student Resources & Financial Aid or the Registrar's Office—including any staff in Student Resources & Financial Aid, Student Success, or the Registrar's Office who are acting in an official capacity for their office—their last date of attendance is the date they initiate the withdrawal process or provide notification. This date is the student's withdrawal date. The school's date of determination for official withdrawals is the same as the student's withdrawal date. In the case of oral notifications, Student Resources & Financial Aid or the Registrar's Office will add a record to the student's file indicating their

verbal notification of withdrawal that includes the date and time of the notification.

- If a student wishes to rescind his official withdrawal, he must provide a written statement giving his intent to remain in academic attendance through the end of the payment period. If the student then withdraws again, his withdrawal date will be the original date of withdrawal or the last documented date the student engaged in academically-related activities.
- For students who do not provide official notification, their last date of attendance will be the date of their last documented academically-related activity, if one can be established; at the midpoint of the payment period; or in cases where students withdraw because of circumstances outside of their control, at the date the school determines that the student's circumstances caused the student to cease attendance. This date is the student's withdrawal date. The school's date of determination for unofficial withdrawal's is the date Student Resources & Financial Aid learns the student has withdrawn or the date grades are posted, whichever date is earlier.
  - Academically-related activities include but are not limited to:
    - Physically attending a class where there is the opportunity to interact with the instructor
    - Submitting an academic assignment
    - Taking a quiz or exam
    - Completing an interactive tutorial
    - Participating in computer-assisted instruction
    - Attending a study group that is assigned by the school
    - Participating in an on-line discussion about academic matters
    - Initiating contact with a faculty member to discuss matters related to the academic subjects covered in a course
  - Academically-related activities do not include activities where a student may be present but is not engaged academically, including:
    - Living in institutional housing
    - Participating in the school's meal plan
    - Logging into an on-line class without participating in academic activity
    - Participating in academic counseling or advisement
    - Non-academic house system activities
  - For students who unofficially withdraw, the date of withdrawal and method used to determine the date of withdrawal will be documented using The College at Southeastern's Unofficial Withdrawal form and added to the student's file.
- For students who drop classes in the winter intersession or summer term, the following questions will be used to determine whether they have withdrawn:
  - After beginning attendance in the payment period or period of enrollment, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?  
If the answer is no, this is not a withdrawal. If the answer is yes, go to question 2.
  - When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses? If the answer is yes, this is not a withdrawal; however, other regulatory provisions concerning recalculation may apply.  
If the answer is no, go to question 3.
  - Did the student confirm attendance in a course in a module beginning later in the payment period or—in the case of the spring term—during the spring semester?  
If the answer is yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the R2T4 requirements apply.

## **vi. Title IV Credit Balances After Student Withdrawal**

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- The school will not release any portion of a Title IV credit balance to the student and will not return any portion to the Department of Education prior to performing the R2T4 process.
- The school will perform the R2T4 calculation, including any existing Title IV credit balance for the period.
- The school will apply any applicable refund policy to determine if doing so creates a new or larger Title IV credit balance.
- The College at Southeastern will allocate any Title IV credit balance as follows:
  - Any Title IV credit balance must be first used to repay any grant overpayment owed by the student as a result of the withdrawal. The College at Southeastern will return any such funds with 14 days of performing the R2T4

calculation. Any Title IV credit balance that exists from a previous period is not used in the R2T4 calculation, but it is included in determining the amount of any final Title IV credit balance.

- Within 14 days of the date the institution performs the R2T4 calculation, the institution will repay any remaining Title IV credit balance in one of the following ways:
  - To pay authorized charges to the institution. The school will not use the Title IV credit balance to return funds for which it is responsible as a result of an R2T4 calculation.
  - Pay it to the student directly
  - If the student or parents cannot be located, the funds must be returned directly to the Department of Education.
  - The College at Southeastern will apply the institutions refund policy before paying a Title IV credit balance.

## **vii. Performing the R2T4 Calculation**

- The Financial Aid office will engage in the Return to Title IV (R2T4) process during the second and fourth weeks of each month. All students who have officially withdrawn since the last R2T4 period, as well as any students who have unofficially withdrawn and for whom the school has a date of determination for their withdrawal, will be included in this process.
  - As a term based, credit hour school using standard terms, The College at Southeastern will use formula 1 for the R2T4 process. The time period will be based on the payment period.
  - The date of withdrawal will be calculated as discussed above.
  - If after withdrawing, The College at Southeastern reduces, reverses, or cancels a student's institutional charges, the R2T4 requirements still apply.
  - The charges used in the R2T4 process are always those charged to a student prior to withdrawal. However, if the student's enrollment status changes prior to and unrelated his withdrawal, then the R2T4 process will be based on the charges that reflect the change in enrollment status.
  - Determining the R2T4 components:
    - Aid disbursed is all aid that has actually been disbursed by the date of determination, with the exception of inadvertent overpayments.
    - Aid that could have been disbursed is any undisbursed Title IV aid that the student was eligible for based on an officially processed ISIR/SAR that includes an official EFC.
      - In cases of inadvertent overpayments—when The College at Southeastern disburses Title IV funds to a student who has ceased attendance but the College has not yet determined they have withdrawn—these overpayments will always be included in the R2T4 calculation as “aid that could have been disbursed.”
    - The percentage of Title IV aid earned is determined by dividing the number of completed days by the number of total calendar days, excluding any breaks of five or more days.
      - If a student enrolled in modules withdraws from all classes in future modules, but completes one class, the date they drop the future classes is important for calculating the amount of total days to be used in the R2T4 process:
      - If a student completes his class, but drops all classes in future modules before completing the first class, the amount of days in the payment period will be limited to the length of the module, excluding any breaks of more than five days.
    - Institutional charges at The College at Southeastern include tuition, enrollment and matriculation fees, campus housing charges and fees, meal plans, and other routinely debited charges.
    - Non-institutional charges at The College at Southeastern include charges for required course materials that the student had a real and reasonable opportunity to purchase elsewhere, charges to a student's account for discretionary educational expenses (e.g. parking, library fines, concert tickets, etc.).
    - The College at Southeastern applies one kind of waiver. Tuition Waivers are applied by paying a portion of tuition and fees that have actually been charged to a student's account. When completing the R2T4 process for students with Tuition Waivers, the full amount of the tuition and fees must be included in Step 5, Part L of the R2T4 calculation (Amount of Unearned Title IV Aid Due from the School).
    - The amount of earned aid is determined by multiplying the percentage of Title IV aid earned by the amount of Title IV aid received.
    - The amount of aid to be returned is determined by subtracting the amount of Title IV aid earned from the

amount of Title IV aid received.

- After performing the R2T4 calculation, The College at Southeastern will return any unearned funds for which it is responsible within 45 days. In general, the Monday morning following the R2T4 process will be used for conducting the refund process.
- After performing the R2T4 calculation, The College at Southeastern will notify students of their responsibilities within 30 days. In general, the Monday morning following the monthly R2T4 process will be used for notifying students. The College at Southeastern will provide the following five items information to students:
  - That the student owes an overpayment of Title IV funds
  - The student's eligibility for Title IV funds will end if the student fails to take positive action by the 45th day after the school notifies him
  - There are three positive actions a student can take to extend her eligibility beyond 45 days:
    - The student may repay the overpayment in full to the school
    - The student may sign a repayment agreement with the school. The maximum time frame the College at Southeastern will allow for a repayment agreement is two years. According to federal policies, the College at Southeastern will ensure that the student will be referred to the Default Resolution Group if he violates the terms of the repayment agreement
    - The student may sign a repayment agreement with the Department of Education
  - If a student fails to take one of the positive actions listed above during the 45 day period, the College at Southeastern will report his overpayment to NSLDS and report the student to the Default Resolution Group for collection
  - The student should contact the school to discuss her options
  - If a student receives additional funds during the 45 day period of extended eligibility, those funds were received while the student is still eligible for Title IV funding. Therefore those funds do not need to be returned if a student fails to take positive action during this period, unless the student withdraws a second time. Similarly, if a student receives additional funds while they in good standing in a repayment agreement, he remains eligible for those funds. Therefore, if the student violates the repayment agreement, he is not required to return the funds received during that period unless he subsequently withdraws
- Return of Title IV Funds Example: Ebonee enrolled for 12 hours in the Fall semester. Class started on August 22 and ended December 11. There are 93 calendar days in the semester (111 days with two scheduled breaks of 9 days each). Tuition and fees are \$7586. She received a total of \$6195 from the Pell Grant.
  - Situation 1) Ebonee withdraws from all classes on September 12. She has completed 16 days and earned 17.2% of her Title IV funds. The College at Southeastern would have to refund \$5130.46 of the Pell funds. Ebonee would have to repay \$0 to Pell.
  - Situation 2) Ebonee withdraws from all classes on October 31. She has completed 56 days, which is 60.2% of the term. Because the percentage is greater than 60%, she has earned 100% of her Title IV funds, and no money needs to be repaid.

### **viii. Rounding Policy**

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- Percentages will be calculated to four decimal places, then rounded to three. The third decimal is rounded up if it is five or above, but rounded down if it is four or below. The exception to this is in calculating the total percentage of R2T4 funds earned. Students who withdraw at any point after the 60% marker have earned the entirety of their FSA funds and the percentage of funds earned will never be rounded down to 60%.

### **ix. R2T4 and Verification**

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- When completing the R2T4 process for students selected for verification, the College at Southeastern will disburse any Title IV grant funds that the student is due to receive as a post-withdrawal disbursement within 45 days of the date of determination. However, if the student has not provided all the required verification documents in time for the College at Southeastern to meet the R2T4 deadlines, the school will only include as Aid disbursed or Aid that could have been disbursed the funds that were not subject to verification. If the student later provides the appropriate documents, the College at Southeastern will perform a new R2T4 calculation and make any necessary adjustments, performing any necessary post-withdrawal disbursement and returning any unearned funds within 45 days of the date of determination that the student withdrew.

- For students with a C code on their ISIR/SAR, the underlying issue must be resolved before performing the R2T4 calculation.

## **x. Post-Withdrawal Disbursements**

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- After performing the R2T4 calculation, if the College at Southeastern determines that a student should receive a post-withdrawal disbursement, the College will do so within 45 days of the date of determination. Any post-withdrawal disbursement will first be applied to the student's current charges for tuition, fees, and room and board. The College at Southeastern must obtain a student's authorization to credit her account with Title IV grant funds for charges other than the charges listed above.

a. Procedures: The R2T4 Process occurs in two primary forms: Upon notification and Upon Review.

i. Upon Notification:

1. When Southeastern is informed that a student has officially withdrawn from the officer who determines the student's withdrawal will email the Director of Financial Aid, The Associate Director of Financial Aid, and the Assistant to the Director and Associate Director of Financial Aid about the student's withdrawn status.
2. The financial aid office will record each withdrawal, as they are informed, in the "R2T4" spreadsheet which only the office has access. When they are first submitted, the withdrawn student will be marked as "PENDING."
3. The automated withdrawal system will inform the accounting of the student's status which prompts the office to apply the Refund Policy to the student's account, as stated above, by the end of the business week.
4. During the second and fourth week of each month, the financial aid office will process all Pending students on the "R2T4" Spreadsheet. This process will involve determining the official last day of academic engagement for each student and performing the calculations per the policy above.
5. Once a student's return has been processed by the Financial Aid Office, the student's status in the "R2T4" spreadsheet will be updated to "CALCULATED"
6. The Financial Aid office will then communicate with the accounting office to return the funds to G5
7. Once these returns have been made, the school will shift the student's status from "CALCULATED" to "RETURNED."

ii. Upon Review:

1. At the end of each payment period, the Financial Aid Office will confirm the eligibility of all recipients of Title IV funds per the policy above.
2. If a student is determined to have withdrawn, or if there is no documentation to confirm that the student has completed the payment period as scheduled, the financial aid office will begin R2T4 processes on the student as
3. The financial aid office will record each withdrawal, as they determine them, in the "R2T4" spreadsheet which only the office has access. When they are first submitted, the withdrawn student will be marked as "PENDING."
4. The Financial Aid Office will email the Accounting office to inform them to apply the Refund Policy to the students' account, as stated above, by the end of the business week.
5. Once the initial determination of all students' enrollment and eligibility status has been confirmed, the financial aid office will process all Pending students on the "R2T4" Spreadsheet. This process will involve determining the official last day of academic engagement for each student and performing the calculations per the policy above.
6. Once a student's return has been processed by the Financial Aid Office, the student's status in the "R2T4" spreadsheet will be updated to "CALCULATED"
7. The Financial Aid office will then communicate with the accounting office to return the funds to G5
8. Once these returns have been made, the school will shift the student's status from "CALCULATED" to "RETURNED."