

## **Return of Title IV, Higher Education Act (HEA) Policy**

When a student applies for financial aid, the student agrees that financial aid funds will be used for educational purposes only. Therefore, if a student withdraws before completing their program, a portion of the funds received may have to be returned. HCHC will calculate the amount of financial aid to be returned to the Title IV, HEA programs according to the policies listed below.

### **Return of Title IV Policy**

This policy applies to students who officially withdraw, unofficially withdraw, fail to return from a leave of absence, or are dismissed from enrollment at HCHC.

The calculated amount of the Return of Title IV (R2T4), HEA funds that are required 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 (federal) 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 the student's incurred institutional charges. Because these requirements deal only with Title IV, HEA funds, the order of return of unearned funds does 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 institution has 45 calendar days from the date that the institution determines that the student withdrew to return all unearned funds for which

it is responsible. The school is required to notify the student if they owe a repayment via written notice.

Eligibility for post-withdrawal disbursements will be confirmed within 30 calendar days of the date that the student withdrew. The school must advise the student or parent that they have 14 calendar days from the date that the school sent the post-withdrawal disbursement notification to accept a post-withdrawal disbursement. If a response is not received from the student or parent within the allowed time frame or the student declines the funds, the school will return any earned funds that the school is holding to the Title IV, HEA programs.

### **Official Withdrawal from HCHC**

A student is considered to be officially withdrawn on:

1. The date the student provided official notification of intent to withdraw, in writing or orally; or
2. The date the student began the withdrawal process from HCHC records. A student is allowed to rescind this notification in writing to the Dean of Students Office and continue the program. If the student subsequently drops, the student's withdrawal date is the original date of notification of intent to withdraw.

Official dates and deadlines for withdrawing are specified in the HCHC Annual Academic Calendar.

A student may withdraw from HCHC at any time from the first class day to the official last day to withdraw as indicated in the HCHC Annual Academic Calendar. The official last day to withdraw is approximately 10 days after the first day of classes known as the Add/drop period.

Students with financial aid who are withdrawing from HCHC are advised to complete the Enrollment Status Change Form through the Registrar's Office or the [MyHCHC](#) student portal. A grade of W is recorded for each course in which a withdrawn student was enrolled.

Students called to active military service during a term in which they are enrolled may be entitled to a refund of tuition and fees if they withdraw or the student may be entitled to receive a final grade or incomplete grade in courses. Students should contact the Registrar to determine their options.

A student is considered a withdrawal from classes offered in a session of enrollment when the student ceases attendance at any point before completing the period of enrollment unless the school obtains confirmation from the student at the time of withdrawal that the student will attend a session that begins later in the same period of enrollment. This confirmation must be obtained at the time of the withdrawal even if the student has registered for subsequent courses.

If a student receives Title IV grant or loan assistance and does **not** begin attendance in a period of enrollment, the student is considered to be ineligible for any Title IV aid.

Upon receipt of the official withdrawal information, HCHC will complete the following:

1. Financial Aid and Scholarships (FAS) verifies the student's attendance through the withdrawal form or the school's attendance records (Audit Rolls);
2. The Return of Title IV (R2T4) calculation is performed to determine the amount of federal funds the student has earned and the amount of unearned Federal funds for which the school and the student is responsible to return (if any).
  1. Calculations are completed using the U.S. Department of Education's Return of Title IV, HEA Funds Worksheets, student's attendance and withdrawal date, and are based upon the period of enrollment.
3. FAS will return the amount of any unearned portion of the Title IV funds for which the school is responsible within 45 calendar days of the date the official notice of withdrawal was provided.

4. FAS will provide the student with a letter explaining any returns that have been made to the Title IV, HEA programs on the student's behalf as a result of exiting the program.
  1. Remaining unearned Title IV loan funds (e.g. Direct Loans) must be repaid by the student in accordance with the terms of the loans.
5. If a student's scheduled attendance is more than 60 percent of the period of enrollment, he/she is considered to have earned 100 percent of the federal funds received for the period of enrollment. In this case, no funds need to be returned and no letter will be sent from FAS.
6. A copy of the completed worksheet and notification letter 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 that he/she is continuing his or her program of study and intends to complete the period of enrollment. Title IV, HEA assistance will continue as originally planned. If the student subsequently fails to attend or ceases attendance without completing the period of enrollment, the student's withdrawal date is the original date of notification of intent to withdraw.

Officially withdrawing from classes may affect the student's future eligibility for financial aid due to Satisfactory Academic Progress (SAP) requirements and R2T4 balances owed.

### **Unofficial Withdrawal from HCHC**

Unofficial withdrawals encompass all other withdrawals where official notification is not provided to HCHC. If a student does not officially withdraw and subsequently fails to earn a passing grade in at least one course offered over an entire period, the institution must assume, for Title IV, HEA purposes, that the student has unofficially withdrawn, unless the institution can document that the student completed the enrollment period.

If a student receives Title IV grant or loan assistance and does **not** begin attendance in a period of enrollment, the student is considered to be ineligible for any Title IV aid.

When a recipient of Title IV grant or loan assistance unofficially withdraws from an institution, after having begun class attendance during a period of enrollment, the institution must determine the amount of Title IV grant or loan assistance that the student earned up to the date of withdrawal. For these unofficial withdrawals, commonly known as dropouts, the withdrawal date is the midpoint of the period of enrollment or the equivalent date for sessions of enrollment, as applicable, or the last date of an academically related activity in which the student participated as stated by the professor of record or authorized departmental representative.

Once grades are final for a term, the following procedures will take place:

1. The Office of Financial Aid will determine which students did not officially withdraw and failed to earn a passing grade in at least one course offered over an entire period.
2. The Office of Financial Aid will make at least three attempts to notify students of their unofficial withdrawal status.
3. The Office of Financial Aid will determine and record the student's last date of attendance as the withdrawal date.

1. The withdrawal date is the midpoint of the period of enrollment or the equivalent date for sessions of enrollment, as applicable, or the last date of an academically related activity in which the student participated as provided by the professor of record or authorized departmental representative.

4. The Return of Title IV (R2T4) calculation is performed to determine the amount of federal funds the student has earned and the amount of unearned federal funds for which the school and the student is responsible to return, (if any).

1. Calculations are completed using the U.S. Department of Education's Return of Title IV, HEA Funds Worksheets, the student's attendance and withdrawal date, and are based upon the period of enrollment.

5. The Office of Financial Aid will return the amount of any unearned portion of the Title IV funds for which the school and the student is responsible within 45 calendar days of the date the official notice of withdrawal was provided.

1. Remaining unearned Title IV loan funds (e.g. Direct Loans) must be repaid by the student in accordance with the terms of the loans.

6. The Office of Financial Aid will provide the student with a letter explaining any returns that have been made to the Title IV, HEA Federal programs on the student's behalf because of exiting the program. If a student's scheduled attendance is more than 60 percent of the period of enrollment, he/she is considered to have earned 100 percent of the Federal funds received for the period of enrollment. In this case, no funds need to be returned and no letter will be sent from The Office of Financial Aid.

7. A copy of the completed worksheet and notification letter will be kept in the student's file.

Unofficially withdrawing from classes may affect the student's future eligibility for financial aid due to Satisfactory Academic Progress (SAP) requirements and R2T4 balances owed.

### **Withdrawal Before 60 Percent Point of the Term**

The institution must perform an R2T4 calculation to determine the amount of earned aid up through the 60 percent point in each period of enrollment. The institution will use the U.S. Department of Education's prorated schedule to determine the amount of R2T4 funds the student has earned at the time of withdrawal.

### **Withdrawal After 60 Percent Point of the Term**

For a student who withdraws after the 60 percent point of the period of enrollment, a student has earned 100 percent of the Title IV funds he or she was scheduled to receive during the period. Thus, there are no unearned funds. HCHC must still perform an R2T4 to determine the amount of aid that

the student has earned and whether or not the student is eligible for a post-withdrawal disbursement.

### **Example of R2T4 Calculation**

1. FAS determines the percentage of Title IV, HEA aid the student earned by taking the calendar days completed in the period of enrollment and dividing by the total calendar days in the period of enrollment (excluding breaks of 5 days or more and days the student was on an approved leave of absence)

1. Example:  $(18 \text{ completed days}) / (118 \text{ total days}) = 15.3 \text{ percent Title Aid Earned}$

2. FAS determines the dollar amount of Title IV aid the student earned by multiplying the percentage of Title IV, HEA aid earned by the total of the Title IV aid disbursed plus the Title IV aid that could have been disbursed for the period of enrollment.

1. Example:  $15.3 \text{ percent} \times (\$1800 \text{ disbursed} + \$1005 \text{ that could have disbursed}) = \$429.17 \text{ Aid Earned}$

3. If this percentage is greater than 60 percent, the student earns 100 percent of the disbursed Title IV, HEA funds or aid that could have been disbursed.

4. If this percentage is less than 60 percent, then the percentage earned is equal to the calculated dollar amount earned.

5. Aid to be returned is equal to the unearned percentage (100 percent minus the Percent earned) multiplied by the amount of aid disbursed toward institutional charges. If a student earned less aid than was disbursed, the institution would be required to return a portion of the funds and the student may be required to return a portion of the funds. All Title IV fund returns must be completed no later than 45 calendar days after the date FAS determines that the student withdrew.

6. Funds are returned to the appropriate federal program based on the percentage of aid earned and the order of return dictated by the U.S. Department of Education.

7. When Title IV, HEA funds are returned, the student may owe a balance to the institution.

## **Order of Return**

HCHC is authorized to return any excess funds after applying them to current outstanding Cost of Attendance (COA) charges. A copy of the Institutional R2T4 worksheet performed on the student's behalf is available through FAS upon written request.

In accordance with Federal Regulations, when Title IV, HEA financial aid is involved, the calculated amount of the R2T4 funds is retracted in the following order:

- Federal Direct Unsubsidized Loan Program
- Federal Direct Subsidized Loan Program
- Federal Direct Graduate PLUS Loan Program
- Federal Direct Parent Loan Program (PLUS)
- Federal Pell Grants
- Federal Supplemental Educational Opportunity Grant Program

## **Earned Aid**

Title IV, HEA aid is earned in a prorated manner on a per diem basis (calendar days) up to the 60 percent point in the semester. Title IV, HEA aid is viewed as 100 percent earned after that point in time. A copy of the worksheet used for this calculation can be requested in writing from FAS.

## **Post-Withdrawal Disbursement Conditions**

If a student has accepted Title IV, HEA financial aid by the date of the withdrawal, but the financial aid has not disbursed, the student may be eligible for a post-withdrawal disbursement. If the amount disbursed to the student is less than the amount the student earned, and for which the student is otherwise eligible, he or she is eligible to receive a post-withdrawal disbursement for the earned aid that was not received. Under these circumstances, an R2T4 calculation must be performed to determine whether the student is eligible for a post-withdrawal disbursement. HCHC must make this determination within 30 calendar days after the student withdraws.



The following conditions apply when processing a post-withdrawal disbursement:

1. A student may not owe a prior year balance or fail to meet Satisfactory Academic Progress according to HCHC and FAS policy.
2. A student must have accepted aid by the date of the withdrawal.
3. If, before the student's withdrawal date a loan offer has been accepted, the loan must also have been originated by HCHC.
4. In all Title IV loan programs, a promissory note must be signed for a loan to be included as Aid that could have been disbursed in an R2T4 calculation. The signature may be obtained after the student withdraws. However, for the loan to be included as Aid that could have been disbursed, the promissory note must be signed before the school performs the R2T4 calculation.
5. If the student is eligible for a post-withdrawal disbursement of a loan, FAS must send notification of post-withdrawal disbursement eligibility to students within 30 calendar days after the student withdraws. Students will be given a minimum of 14 calendar days to respond to the post-withdrawal disbursement offer.
6. HCHC will disburse any Title IV grant funds a student is due as part of a post-withdrawal disbursement within 45 calendar days of the date HCHC determined the student withdrew and disburse any loan funds a student accepts by the post-withdrawal disbursement deadline within 180 calendar days of the withdrawal date. The school must obtain written permission from the student before loan funds can be disbursed.
7. A school cannot make a post-withdrawal disbursement to a deceased student or a student who has not signed the loan's promissory note.

For students who provide notification back to HCHC that they want the loan funds before the post-withdrawal disbursement deadline, FAS will disburse the loan.

### **Time Frame for the Return of Title IV Program Funds**

The following rules apply when completing a Return calculation for a student.

1. HCHC will return any unearned Title IV funds it is responsible for returning within 45 calendar days of the date HCHC determined the student withdrew and offer any post-withdrawal disbursement of loan funds within 30 calendar days of that date.
2. Unless a student subject to verification has provided all required verification documents in time for HCHC to meet the Return deadlines, HCHC includes Aid Disbursed or Aid That Could Have Been Disbursed in the Return calculation.
3. If it is determined that a student failed to provide all required verification documents in time for HCHC to meet the Return deadline and later provides those documents before the applicable verification deadline, HCHC must perform a new return calculation on all of the aid the student qualified for based on the completed verification documents and make the appropriate adjustments.
4. To give a Pell Grant to a student, HCHC must have a valid output document (one with an official Expected Family Contribution computed from correct data) while the student is still enrolled for the award year or in the time frame the student qualifies for a late disbursement under 34 CFR 666.164 (J)(4)(i).

### **Time Frame for the Return of an Unclaimed Title IV Credit Balance**

In the event HCHC cannot locate the student (or parent) to whom a Title IV credit balance must be paid, the Student Account will determine what programs constitute the refund and will notify the Office of Financial Aid of any unclaimed credit balances that need to be returned to Title IV, HEA programs. The Office of Financial Aid must return the funds no later than 240 calendar days after the date the school issued the check or 45 calendar days after the EFT was rejected.

## **Institution Responsibilities**

The following are HCHC's responsibilities regarding Title IV, HEA funds:

- HCHC will provide students with information about this policy.
- The Office of Financial Aid will identify students who are affected by this policy and complete the Return of Title IV funds calculation for those students.
- Any Title IV, HEA funds required will be returned to the correct Title IV programs within 45 calendar days of the date the official notice of withdrawal was provided.
- If less Title IV aid has been disbursed than the student has earned, a post-withdrawal disbursement will be calculated and must be offered.

The institution will always return all the excess funds, including funds the Return of Title IV calculation identifies as the student's responsibility to return.

## **Student Responsibilities**

- Any notification of withdrawal should be in writing and sent to the Registrar's Office or via the [MyHCHC](#) student portal.
- A student may rescind his or her notification of intent to withdraw. Submissions of intent to rescind a withdrawal notice must be filed in writing and sent to the Registrar's Office or via the [MyHCHC](#) student portal.
- These notifications, to either withdraw or rescind to withdraw, must be sent in writing to the Registrar's Office or via the [MyHCHC](#) student portal.
- Student must repay any funds to HCHC that were disbursed to the student in which the student was determined to be ineligible via the R2T4 calculation.
- Remaining unearned Title IV loan funds (e.g. Direct Loans) must be repaid by the student following the terms of the loans.

## **Refund vs. Return of Title IV Funds**

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

## **Return of Title IV Questions**

If you have questions regarding Title IV, HEA program funds after visiting with or emailing FAS, you may call the Federal Student Aid Information Center at 1-800-4-fedaid (800-433-3243). TTY users may call 800-730-8913. You can find more information by [visiting Federal Student Aid](#).