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# NHSC RETURN OF TITLE IV (R2T4) POLICY

Updated October 2018

NHSC, in compliance with federal regulations, established the following policies and procedures to ensure that students who receive federal financial aid (Pell, SEOG, FWS, Iraq Afghanistan Service Grant) are making satisfactory academic progress (SAP – please see the Financial Aid Policy Manual and/or the Student Handbook for additional information, regarding SAP) toward a certificate, associate degree or baccalaureate degree. Federal regulations requires that all institutions of higher learning develop a policy that determines the amount of Title IV grant or loan assistance that a Title IV aid recipient has earned as of the recipient's withdrawal date. The withdrawal date information and a discussion of how an R2T4 Calculation is made is part of NHSC's policy.

***IMPORTANT: The unearned portion of Title IV financial aid not returned to the Department by the school becomes the student's responsibility.***

Federal monies will be disbursed to students who have completed Pell files, soon after the census date each semester (NHSC uses the 3<sup>rd</sup> Friday of the semester). All other need-based awards will be disbursed after federal Pell monies have been disbursed.

In calculating the return of Title IV funds at NHSC, the following steps will be taken:

1. ***NHSC will review information about Title IV aid that the student received. The NHSC Financial Aid Office determines the amount of Title IV aid originally awarded and whether it is "disbursed" or "could have been disbursed."*** A copy of the withdrawal form, complete with instructors' and/or academic advisor's signature(s) and indicating the last date of attendance, is received in the NHSC Financial Aid Office. The date of withdrawal on the withdrawal form will be used as the withdrawal date. (See further explanation below, regarding how the withdrawal date is determined.)
2. ***The NHSC Financial Aid Office calculates the percentage of Title IV aid earned by the student.*** The percentage of Title IV aid earned is determined by dividing the number of completed calendar days in the period of enrollment by the total number of calendar days in the period of enrollment (excluding scheduled breaks of 5 calendar days or more) rounded down to the nearest tenth of a percent.
3. ***The NHSC Financial Aid Office calculates the amount of Title IV aid earned by the student.*** The amount of Title IV aid earned is determined by multiplying the percentage of Title IV aid earned times Title IV aid disbursed plus Title IV aid that could have been disbursed during the payment period.
4. ***The NHSC Financial Aid Office determines if the student is due a post-withdrawal disbursement OR if Title IV aid must be returned.*** The amount of aid disbursed is

If the amount of aid earned is more than the amount of aid disbursed, the student is due a post-withdrawal disbursement of Title IV aid. \*

compared to the amount of aid earned.

*While NHSC does not offer loans, we are required to notify students of the following: Pell Grants do not require the student's approval to be disbursed and applied to eligible charges. Direct Loans Post-Withdrawal do require that the school notify the student in writing of the student's eligibility for a loan PWD within 30 days of determining the last date of attendance of the student's eligibility for a loan PWD. The student must approve of the disbursement in writing.*

**The NHSC Financial Aid Office will determine the repayment based upon federal and state procedures.** The repayment amount is considered unearned aid a student was not eligible to receive because of not completing the term, necessitating the repayment of funds.

\*If a student is due a post-withdrawal disbursement, payment shall be made within 45 days from the time NHSC determines that the student withdrew. The post-withdrawal disbursement shall first be applied to the student's account for outstanding current period charges due to NHSC. If funds remain, NHSC shall notify the student in writing that he is due a post-withdrawal disbursement. The school shall identify the type and amount of funds and explain the option to accept or decline all or part of the disbursement. The student shall be advised that he or she must respond within 14 days of the date of notice to receive payment of the post-withdrawal disbursement.

If the amount of aid earned is less than the amount of aid disbursed, Title IV aid must be returned. *The portion of unearned Title IV financial aid required to be returned by the school to the Department must be returned within 45 days of the date the school determined the student's last date of attendance (withdrawal date).*

If a student must return unearned aid to the Title IV programs, NHSC shall send a notice to the student within 30 days after it has determined the student withdrew from school.

The notice shall explain to the student that he or she retains eligibility for Title IV funds for a 45-day period during which one of the following should happen:

- Repayment in full
- Satisfactory repayment arrangement with NHSC to repay the funds (within a 2-year period)
- Satisfactory repayment arrangement with the Department of Education

*If a student fails to repay the overpayment or sign an agreement with the school within the 45 day period or fails to meet the terms of agreement signed with NHSC, the college shall report the overpayment to the Department of Education's NSLDS department. At that time, the student shall lose his or her eligibility for federal Title IV financial aid.*

5. ***NHSC will return funds to the federal programs on the student's behalf and will bill the student.*** In the instances in which a student owes a federal grant repayment in addition to what NHSC has returned to the federal programs, the student is notified in writing and the amount is reported by the Financial Aid Office as an overpayment. The student is responsible for all NHSC charges and federal overpayments resulting from an R2T4 calculation.
6. ***NHSC may have an obligation to return funds to an aid program that was previously applied to the student's account.*** The student may have an obligation to repay funds that were paid directly to him or her. If NHSC returns funds that were applied to the student's account, a balance due will result. The student will owe that balance to NHSC. Failure to repay will prevent future registration at NHSC and will initiate delinquent collection procedures.
7. ***NHSC shall calculate the amount of unearned Title IV aid due from the school.*** NHSC shall calculate the actual institutional charges for the payment period (Please see explanation of institutional charges below). The NHSC Business Office provides the student's original charges. The institutional refund is calculated by multiplying the amount of institutional charges times the percentage of Title IV aid unearned. This amount is compared to the amount of Title IV aid that must be returned and the lesser amount is refunded to the Title IV aid programs.
8. ***NHSC shall determine the Return of Title IV Funds by the school.*** NHSC shall return the unearned aid for which it is responsible by repaying funds to the following sources, in order, up to the total net amount disbursed from each source: Federal Pell Grant, Federal SEOG, Federal Work Study, Iraq Afghanistan Service Grant.
9. ***NHSC shall calculate the initial amount of unearned Title IV aid due from the student.*** To determine the initial amount of unearned Title IV aid due from the student, NHSC shall subtract the amount of Title IV aid due from the school from the amount of Title IV aid to be returned.
10. ***NHSC shall determine the Return of Title IV Funds by the student.*** If the initial amount of unearned Title IV aid due from the student is greater than zero, the student must

For a student who was awarded Title IV financial aid, NHSC shall calculate the percentage of Title IV aid earned through the 60% point in an enrollment period. After the 60% point of the enrollment period, the student has earned 100% of Title IV financial aid awarded.

return unearned aid for which he or she is responsible by repaying funds to the following sources, in order, up to the total net amount disbursed from each source, after subtracting the amount the school will return: Federal Pell Grant, Federal SEOG, Federal Work Study, and Iraq Afghanistan Service Grant. Amounts to be returned by students to grants are reduced by 50%. A student does not have to repay a grant overpayment of \$50 or less.

### **How is the withdrawal date determined?**

If the student officially withdraws, the withdrawal date is the date that NHSC determines the student provided official notification to NHSC, in writing or verbally, of his or her intent to withdraw.

If the student does not provide official notification of his or her intent to withdraw, the withdraw date will be determined as the last date of attendance at an academically-related activity NHSC when the school became aware that the student was not attending.

Examples of academic attendance or attendance at an academically-related activity include:

- Physical class attendance where there is direct interaction between instructor and student;
- Submission of an academic assignment;
- Examination, interactive tutorial, or computer-assisted instruction;
- Study group assigned by school;
- Participation in on-line discussion about academic matters;
- Initiation of contact with instructor to ask question about academic subject.

If a student does not return from an approved leave of absence, the withdraw date is the date that NHSC determines the student began the leave of absence.

A program offered in modules is defined by the U.S. Department of Education as a course or courses in a program that do not span the entire length of payment period of period of enrollment.

A student is considered to be a withdrawal if he/she does not complete all days scheduled to complete within the payment period or term.

### **Office to Contact to Withdraw from Classes:**

The designated office that students must contact when they intend to withdraw from all classes is the Registrar's Office on the Nueta Hidatsa Sahnish College Campus.

NHSC may choose to make adjustments to institutional charges after the R2T4 calculation have been completed for students who withdraw or drop classes because they are called to active military duty.

**Institutional versus Non-Institutional Charges**

Institutional charges generally are defined as the charges for tuition and fees, room and board, and other educational expenses that are paid to the school directly.

If a fee (like a registration or technology fee) is required for all students in a program, then the fee should be considered an institutional charge.

The following educational expenses must be considered institutional charges:

- all charges for tuition, fees, and room and board (if contracted with the school)
- expenses for required course materials (books, kits, tools, supplies, etc.) if the student does not have a real and reasonable opportunity to purchase the required course materials from any place but the school

**Exceptions:** Excludable costs are costs a school may exclude from the total amount of institutional costs, such as the documented cost of unreturnable equipment and documented cost of returnable equipment if not returned in good condition within 20 days of withdrawal.

Non-institutional charges (not included in an R2T4 calculation) include the following:

- charges for any required course materials that a school can document a student had a real and reasonable opportunity to purchase elsewhere;
- charges to a student's account for discretionary, educationally related expenses (e.g., parking or library fines, the cost of athletic or concert tickets, etc.).