

RETURN TO TITLE IV POLICY

The Return to Title IV (R2T4) Process is an essential part of processing Title IV funds. The Federal government requires that when recipients of Title IV funding completely withdraw from a payment period, the school must calculate how much of the award the student earned and return the remaining portion to the department through G5.

Payment Periods

3 Payment periods: Fall, Spring, Summer

- Fall semester: 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 Break—which must be subtracted from the total number of calendar days to determine the total number of instructional days in the payment period.
- Spring semester: For the spring term, there is a winter intersession and spring semester which make up a single payment period. The start date and end date of the two terms are determined by the academic calendar. The academic period ends on the final day of classes. The winter intersession contains no scheduled breaks of more than five days. The spring semester contains one instructional break of nine days (a full week, plus the weekend before and after) during the spring semester—Spring 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, the student must either be enrolled in at least one class for the spring semester or indicate that they will be taking at least one class in the spring semester in writing. If the student fails to meet these requirements, they will be treated as a withdrawal for the entire spring term.
- Summer semester: For the summer term, there is a May intersession and summer semester which make up a single payment period. The start date and end date of the two terms are determined by the academic calendar. The academic period ends on the final day of classes. Neither the summer term nor the May intersession contains any scheduled breaks of greater than five days.
 - If a student enrolled in classes in the May intersession ceases attendance in all classes in the May intersession, the student must either be enrolled in at least one class for the summer semester or indicate that they will be taking at least one class in the summer semester in writing. If the student fails to meet these requirements, they will be treated as a withdrawal for the entire summer term.

Withdrawal Policy

Official Withdrawals: In order to withdraw officially from enrollment, a student must consult the Registrar's Office, obtain certain required approvals, return all materials on loan to the Library, and clear their accounts with the Business Office. A Withdrawal Form is available online on the Registrar's page. Students whose withdrawals are completed before the final drop date will receive a reversal of fees. Leavell College students receiving Title IV funds 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 or complete the request for an official leave of absence.

Additionally, a student may initiate the withdrawal process by contacting the Academic Advisor, the program-level Assistant Registrar, or the Director of 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. While the official withdrawal can be initiated verbally, an official withdrawal is finalized by completing the process outlined in the previous paragraph. For Title IV purposes, the date of the withdrawal is the date the withdrawal is initiated, whether verbal or written.

Unofficial withdrawals for Title IV Fund Receivers: Students who receive Title IV funds are considered to have unofficially withdrawn when they cease attendance or academic engagement in all their classes according to the institution's attendance policy. Students who are withdrawn from a course due to lack of attendance or academic engagement will receive the grade of WF. Students who earn all WFs in a given term are considered unofficially withdrawn.

- For students in all traditional classes, ceasing attendance will be determined by the course attendance records.
- In non-traditional classes, ceasing attendance will be determined by the last date of academic activity.
- Additionally, if a student in all online classes verbally indicates her intention to withdraw to the Academic Advisor, the program-level Assistant Registrar, or the Director of Financial Aid who are acting in their official capacity, but never officially completes the withdrawal process, she will also be 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 Leavell College 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.

Students who receive a grade of F in all classes: When a student receives all Fs at the end of a semester, a process will be enacted to determine whether the student earned any of the Fs or if the student received all Fs due to failure to attend class. The Financial Aid Office will reach out to the Registrar's Office for confirmation that the student has earned at least one F in a class eligible for FSA. If the school cannot document that at least one F was earned, it will be assumed that the student is a withdrawal. Next, the school will attempt to determine the last date of attendance and use that as the student's withdrawal date. However, if the last date of attendance cannot be determined, the school will use the 50% point of the term as the withdrawal date.

Failure to Begin Attendance in Classes

Students who do not begin attendance in at least one class that is eligible for Title IV funds in a payment period will not be eligible to receive federal funds. Federal funds will be returned within 30 days from the determination that the student failed to begin attendance in at least one eligible class.

If a student does not begin attendance in a given class during a payment period, then the student is not eligible to receive the funds allocated for that class. The Pell Grant award will be adjusted to reflect the student's new enrollment status. The additional funds will be returned within 30 days of the determination that the student failed to begin attendance.

Leave of Absence

A Leave of Absence (LOA) is a temporary disruption in a student's program of study. Per federal regulations, an LOA cannot exceed 180 days in any 12-month period. Any student considering

requesting an LOA that has received Title IV funding should consult the Financial Aid Office prior in order to determine the ramifications of the LOA.

All LOA requests are evaluated by the Dean and Associate Dean of Leavell College. Should the Dean approve an LOA for a student, the student may need to return a portion of their federal aid grant, and this amount will be determined by using the Return to Title IV policy standard. For Leavell College, an LOA may only be granted for one Fall semester or one Spring semester in a given academic year OR calendar year. If a student wishes to take more than one semester away from courses, the student should complete the withdraw from enrollment process. Please see the following criteria per the federal regulations:

- The student must request the LOA in writing to the appropriate Dean.
- An LOA cannot be granted for academic reasons.
- There must be a reasonable expectation that the student will return following the LOA.
- There cannot be any associated fees or charges with the LOA. As such, the student is not eligible for any additional federal aid.
- The institution must explain the requirements and regulations of the student's financial status (grace period, repayment) prior to granting the LOA. The approval letter to the student will contain the financial consequences if the student fails to return from the LOA.

A student granted an LOA is not to be considered withdrawn and no return of Title IV calculation is required. If a student does not meet the LOA criteria, the student is considered to have ceased attendance from the institution, and a Title IV return of funds calculation is required if the student received federal aid.

If a student is approved for an LOA they will need to complete the "Request for Leave of Absence (LOA)" form. Students can request a copy of this form from the Leavell College Office or the Financial Aid Office. This form must be signed by the student, the Dean of Leavell College, and the Financial Aid Director.

Date of Withdrawal and Date of Determination

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

- Each on-campus course at Leavell College 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 Leavell College will acquire official documentation from professors that students have begun a course in accordance with Title IV requirements. Alongside this attendance procedure, Leavell College 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 Leavell College will have one attendance checkpoint. By the end of the second week of each session, each class will contain an online quiz

through Canvas 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, the ITC and Financial Aid Office will work in conjunction to complete an activity check report in Canvas. This activity check will be one means used to verify that a student has completed more than 60% of their courses.

- This quiz will be one means used to help demonstrate whether students have unofficially withdrawn. However, failure to take the quiz 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 completing the withdrawal form or by indicating their intention to withdraw (either in writing or verbally, to the Academic Advisor, the program-level Assistant Registrar, or the Director of Financial Aid), 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, 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 withdrawals is the date Financial Aid learns the student has withdrawn or the end of the academic year, or the end of the student's educational program, 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 online 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 online 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 Leavell College's Unofficial Withdrawal form and added to the student's file.
- For students who drop classes in the winter/May intersession or in a module, the following questions will be used to determine whether they have withdrawn:
 - 1. 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.
 - 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.
 - 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.

Title IV Credit Balances After Student Withdrawals

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.

Leavell College 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. Leavell College will return any such funds within 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.

- Leavell College will apply the institution's refund policy before paying a Title IV credit balance.

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.

Important to Note

- Leavell College will perform the R2T4 calculation based on the percentage of days completed within the semester to determine the amount of aid earned by the student.
- The date of withdrawal will be based on the student's last day of attendance.
- 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 to his/her withdrawal, then the R2T4 process will be based on the charges that reflect the change in enrollment status.
- If after withdrawing, Leavell College reduces, reverses, or cancels a student's institutional charges, the R2T4 requirements still apply.

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.
- Institutional charges at Leavell College include tuition, enrollment fees, campus housing charges and fees, meal plans, and other routinely debited charges. These charges will be included in the R2T4 calculation.
- Non-institutional charges at Leavell College include charges for required course materials that the student had a real and reasonable opportunity to purchase elsewhere, and charges to a student's account for discretionary educational expenses (e.g. parking fines, library fines, food, etc.). These charges will not be included in the R2T4 calculation.

Determining R2T4 Amount

- First, the total amount of aid that was disbursed and that could have been disbursed is determined.
- Next, the percentage of the semester completed is determined by dividing the number of completed days by the number of total calendar days, excluding any breaks of five or more days.
- The percentage of the semester completed will be multiplied by the amount of aid that was disbursed and that could have been disbursed. This calculation will determine the amount of aid earned by the student.
 - If a student has completed more than 60% of the semester, then they have earned the entire amount of Title IV aid that they were awarded.
- The amount of aid earned will be compared to the amount of aid disbursed to determine the next step in the R2T4 process.
 - Post-withdrawal Disbursement - If the amount of aid earned is greater than the amount of aid disbursed then the amount of aid disbursed will be subtracted from the amount of aid earned to calculate the amount of the post-withdrawal disbursement.

- Aid to be Returned - If the amount of aid earned is less than the amount of aid disbursed then the amount of aid earned will be subtracted from the amount of aid disbursed to calculate the amount of aid that must be returned.
 - In the order of returns, the Pell Grant will be returned first followed by other sources of aid as necessary. For example, this may include the Iraq and Afghanistan Service Grant (IASG). Leavell College students are not eligible for any other form of FSA.
- Leavell College will then determine the amount of aid to be returned by the school and the amount of aid to be returned by the student or determine the amount of aid to be offered to the student as a post-withdrawal disbursement.

After Performing the R2T4 Calculation

- After performing the R2T4 calculation, Leavell College will return any unearned funds for which it is responsible within 45 days.
- After performing the R2T4 calculation, Leavell College will notify students of their responsibilities within 30 days.
 - Leavell College will alert the student of the overpayment and the amount. If the student fails to take positive action within 45 days of being notified by the school, he/she will lose eligibility to receive Title IV funds at any school. Leavell College will then report the student's overpayment to NSLDS and report the student to the Default Resolutions Group for collection.
 - Students can take one of two possible positive actions to extend his/her eligibility beyond 45 days (The student can call the Financial Aid Office to discuss these options further).
 - 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 Leavell College will allow for a repayment agreement is two years.
 - In compliance with federal policies, Leavell College 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 during the 45-day period, the school will report the student's overpayment to NSLDS and refer the student to the Default Resolution Group for collection.
 - 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 are in good standing in a repayment agreement, he/she 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.

Rounding Policy

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. Calculating the total percentage of R2T4 funds earned is the only exception. 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%.

R2T4 and Verification

When completing the R2T4 process for students selected for verification, Leavell College 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 Leavell College 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, Leavell College 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.

Post-Withdrawal Disbursements

If Leavell College determines that a student should receive a post-withdrawal disbursement after performing the R2T4 calculation, the disbursement will be issued 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. Leavell College must obtain a student's authorization to credit her account with Title IV grant funds for charges other than the charges listed above.

PROCEDURE

a. Following notification

1. After a student has notified Leavell College of their intent to withdraw, the officer who determined the withdrawal will email the Financial Aid Director, the Title IV Coordinator, and the Registrar concerning the student's withdrawal status.
2. The Financial Aid Office will record each withdrawal, as they are informed, in the "R2T4" spreadsheet to which only the Financial Aid Office has access. When they are first submitted, the withdrawn student will be marked as "PENDING."
3. During the second and fourth week of each month, the Financial Aid Office will process all students labeled "PENDING" 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.
4. 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."
5. The Financial Aid Office will then communicate with the Business Office to return the funds through G5.
6. Once these returns have been made, the school will change the student's status from "CALCULATED" to "RETURNED."

b. Following determination

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.
3. The Financial Aid Office will record each withdrawal, as determined, in the "R2T4" spreadsheet to which only the Financial Aid Office has access. When they are first submitted, the withdrawn student will be marked as "PENDING."

4. 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.
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 Business Office to return the funds through G5.
7. Once these returns have been made, the school will shift the student's status from "CALCULATED" to "RETURNED."