

Return to Title IV (R2T4) Policy

The law specifies how CSPN must determine the amount of Title IV financial aid that a student earns if they withdraw from school. The Title IV programs that are covered by this law which CSPN participates in are Federal Pell Grants and Federal Direct Loans aka Stafford Loans.

When a student withdraws during their payment period or period of enrollment (CSPN defines each half of the program as a payment period) the amount of Title IV financial aid that they have earned up to that point is determined by a specific formula. If the student received (or CSPN or their parents received on their behalf) less aid than the amount that they earned, the student may be able to receive those additional funds. If the student received more aid than they earned, the excess funds must be returned by the school and/or the student.

The amount of aid that a student has earned is determined on a pro-rata basis. For example, if the student completed 30% of the clock hours in their payment period (450 total clock hours), they earn 30% of the aid they were originally scheduled to receive. Once the student has completed at least 60% of the clock hours in the payment period, they earn all (100%) of the aid that they were scheduled to receive for that period. Any unearned aid will first be returned from the student's Pell grant disbursement. If the unearned aid exceeds the student's Pell grant disbursement, then the school will return aid from the student's disbursed unsubsidized Direct Loan and then finally from the student's disbursed subsidized Direct Loan if necessary.

If the student did not receive (or the School did not receive on their behalf) all of the funds that they earned, the student may be due a post-withdrawal disbursement. If the post-withdrawal disbursement includes loan funds, CSPN must get the student's permission before CSPN can disburse to them. The student may choose to decline some or all of the loan funds so they don't incur additional debt. CSPN may automatically use all or a portion of the student's post-withdrawal disbursement (including loan funds, if they accept them) for tuition and fees. For all other school charges, the school needs the student's permission to use the post-withdrawal disbursement. CSPN requires permission to be given at the time of accepting/denying aid on the initial award letter. However, it may be in the student's best interest to allow the school to keep the funds to reduce their debt at the school.

There may be some Title IV funds that the student was scheduled to receive that cannot be disbursed to them once they withdraw because of other eligibility requirements. For example, if the student is a first-time, first-year undergraduate student and they have not completed the first 30 days of their program before they withdraw, they will not receive any Direct loan funds that they would have received had they remained enrolled past the 30th day.

If the student receives (or CSPN on their behalf receives) excess Title IV program funds that must be returned, CSPN must return a portion of the excess equal to the lesser of:

1. The student's institutional charges multiplied by the unearned percentage of their funds, or
2. the entire amount of excess funds.

CSPN must return this amount even if CSPN did not keep that amount of the student's Title IV program funds.

If CSPN is deemed not required to return all of the excess funds, the student must return the remaining amount. Any loan funds that the student must return, the student must repay in accordance with the terms of their promissory note. That is, the student makes scheduled payments to the holder of the loan over a period of time.

Any amount of unearned grant funds that the student must return is called an overpayment. The amount of a grant overpayment that the student must repay is half of the grant funds they received or were scheduled to receive. The student must make arrangements with CSPN or the Department of Education to return the unearned grant funds. The school will return any unearned grant funds to the Dept. of Ed no later than 45 days from the school's date of determination that the student has withdrawn.

The requirements for Title IV program funds when a student withdraws are separate from any refund policy that CSPN may have. Therefore, the student may still owe funds to CSPN to cover unpaid institutional charges. CSPN may also charge the student for any Title IV program funds that CSPN was required to return. If the student does not already know what CSPN's refund policy is, they can ask the Financial Aid Administrator for a copy or refer to their Enrollment Agreement.

Students are mailed a written detailed summary of their post withdrawal financial and financial aid situations, a Post Withdrawal Authorization Form and copy of this policy upon their withdrawal. The offer to the student for a post-withdrawal disbursement of loan funds will be made within 30 days from the school's date of determination that the student has withdrawn.

Additionally, the school will disburse any Title IV grant funds a student is due as part of a post-withdrawal disbursement within 45 days of the date the school determined the student withdrew and disburse any loan funds a student accepts within 180 days of the date the school determined the student withdrew.

Students are required to respond to the Post withdrawal Authorization Form within 14 days. If a student fails to return unearned funds, CSPN will notify The Department of Education's Debt Resolution Services office.

CSPN adheres to all standards set by the Accrediting Board of Health Education Schools (ABHES).

The process of determining the official date of withdrawal (Date of Determination) is as follows:

- 1) The student requests and is granted and Approved Leave of Absence (LOA). The official withdrawal date will be communicated to the student by the school either by mail or email. The student will be notified no later than 3 business days from the student's written request.
- 2) The Executive Director places a student on an LOA. The student will be notified by the school either by mail or email and this notification will list the official withdrawal date.
- 3) The student is dismissed by the Admissions and Promotions Committee. The school will notify student that the committee has dismissed the student by mail. The notification will indicate the official withdrawal (dismissal) date. This notification will be sent no later than 3 business from the date the committee voted to dismiss the student.
- 4) The student submits a written request by either email, mail or hand delivery to the Executive Director to withdraw from the program. If granted, the official withdrawal date will be communicated to the student by the school either by mail or email. The student will be notified no later than 3 business days from the student's written request.

The process of determining the unofficial date of withdrawal is as follows:

- 1) Unapproved Absences: When a student misses a full day of class and does not notify the school prior to the absence (no call, no show) the student will be considered unofficially withdrawn until such time the student returns or provides the school with an explanation for the absence. If the student has 3 consecutive no call, no show school days, the student will be referred to the Admissions and

Promotions Committee to determine if the student will be dismissed. If the student is dismissed, they will become officially withdrawn as of the last day the student attended. The school will notify the student that the committee has dismissed the student by mail. The notification will indicate the official withdrawal (dismissal) date. This notification will be sent no later than 3 business days from the date the committee voted to dismiss the student. No action regarding the R2T4 process will be taken against the student until the student is considered officially withdrawn.

- 2) Approved Leaves of Absences: are governed by the school's LOA Policy which is provided here for your convenience:

Leave of Absence

The Executive Director may place a student on a Leave of Absence when it has been identified that this is in the best interest of the student and/or the school. A student may also request an LOA, voluntarily. A student requesting an LOA must submit a request in writing a signed and dated explanation of why the student is requesting an LOA to the Executive Director either by mail or email or in person. The Executive Director will notify the student, in writing, of the decision. The student may return to the program at the discretion of the Executive Director, and/or the Admissions and Promotions Committee if they believe there is reasonable expectation that the student will return from the LOA and the student followed this LOA policy.

While the student is on their LOA, the school will not assess any additional institutional charges, incur any tuition increases and is not eligible for any additional Federal Student Aid.

The LOA combined with any other additional leaves of absence may not exceed a total of 180 days in any 12-month period.

Upon return, the student must meet the requirements of the class into which they are placed. All students enrolled in the nursing program must complete the program within eighteen months (150% of the normal program length) of their initial admission. The student will resume attendance at the beginning of the same level in which they were previously granted the LOA.

The student will be notified of the effects an LOA will have on any disbursed Direct Loan the student has prior to the granting of an LOA. Additionally, the student will be notified that if they do not return they will be treated as withdrawn and the effects that this status will have on the Student's Direct Loan grace period and repayment terms.

Students unable to complete the program within 18 months will be terminated and will be ineligible for readmission or graduation. A new background check (paid for by the student) and drug screen (paid for by the School) must be submitted to CSPN twelve weeks or less prior to returning to the program. Re-admittance to CSPN will align with all guidelines set forth by House Bill 327. Upon return, tuition is calculated by the Financial Officer for repeat courses.

If the school grants an LOA that does not meet the conditions of this policy, the student will be considered withdrawn for Title IV purposes.

The following are possible examples of Return to Title IV scenarios:

Example 1

The independent student has been awarded the following financial aid for the first half of the program: Pell Grant \$3,047.50, Direct Unsubsidized Loan \$3,000.00 and Subsidized Loan \$1,750.00. At the date of determination of the student's withdrawal, the Pell Grant and the two Direct Loans had been disbursed. The student had completed 270 of the 450 payment period clock hours or 60% of the payment period clock hours. Since the student has completed at least 60% of the clock hours for the payment period, the student is considered to have earned 100% of the awarded federal financial aid. As a result, no financial aid will need to be returned to the Dept. of Ed. Any tuition not covered by this financial aid will still need to be paid by the student or will be kept by the school if it has already been paid per the tuition policy.

Example 2

The independent student has been awarded the following financial aid for the first half of the program: Pell Grant \$3,047.50, Direct Unsubsidized Loan \$3,000.00 and Subsidized Loan \$1,750.00. At the date of determination of the student's withdrawal, the Pell Grant had been disbursed and the two Direct Loans had been originated with the COD but not disbursed. The student had completed 158 of the 450 payment period clock hours or 35.1% of the payment period clock hours. Since the clock hours completed is less than 60%, the student has earned the actual calculated percentage of all awarded financial aid or \$2,736.92 (35.1% x \$7,797.50). As a result, \$310.58 (3,047.50 – 2,736.92) in Pell Grant aid will need to be returned to the Dept. of Ed. And the direct loans will be cancelled. Any tuition for the payment period not covered by the earned financial aid (\$2,736.92) will still need to be paid by the student per the tuition policy.

Example 3

The independent student has been awarded the following financial aid for the first half of the program: Pell Grant \$3,047.50, Direct Unsubsidized Loan \$3,000.00 and Subsidized Loan \$1,750.00. At the date of determination of the student's withdrawal, the Pell Grant had been disbursed and the two Direct Loans been originated but not disbursed. The student had completed 270 of the 450 payment period clock hours or 60% of the payment period clock hours. Since the student has completed at least 60% of the clock hours for the payment period, the student is considered to have earned 100% of the awarded federal financial aid. As a result, no financial aid will need to be returned to the Dept. of Ed. However, since the direct loans had not been disbursed prior to the withdrawal, the student will be given the opportunity to allow the school to make a post withdrawal disbursement for the student. The school cannot make this disbursement without the student's consent. The student will want to consider various factors like school tuition balance due and outstanding loan debt when making this decision.

These examples do not cover every situation. The student should contact their financial aid office if they have questions or would like to see additional examples.

If the students have questions about their Title IV program funds, they are also provided with the following information: Students can call the Federal Student Aid Information Center at 1-750-4-FEDAID (1-750-433-3243). TTY users may call 1-750-730-8913. Information is also available on Student Aid on the Web at www.studentaid.ed.gov.