



UNIVERSITY OF
WINCHESTER

**RETURN OF TITLE IV FUNDS (R2T4)
POLICY (U.S. FEDERAL AID)**

Document Title:	Return of Title IV Funds Policy (R2T4)
Responsible Role and Department:	Head of International Student Success, Director of Student Support and Success
Approving Body:	University Leadership Team
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<p>Indicate whether the document is for public access or internal access only.</p> <p>Indicate whether the document applies to collaborative provision?</p> <p><i>(Strikethrough text, as appropriate)</i></p>	<p>Public Access</p> <p>Internal Access Only</p> <p>Applies to Collaborative Provision</p>
<p>Summary:</p> <p>The Return of Title IV Funds (R2T4) Policy sets out the rules that determine the amount of federal student aid the University and the student are allowed to retain/ refund if a student withdraws from the University before completing the course.</p>	

Contents

1. Introduction.....	4
2. Process	4
3. Return of Title IV funds	5
4. Leaves of Absence (LOA) and Return of Title IV funds.....	6
5. LOA that does not meet eligibility conditions.....	7
6. Students who fail to return from LOAs.....	7
7. Withdrawal.....	7
8. Explanation of consequences of withdrawal to loan recipients.....	7

1. Introduction

This policy specifies how the University of Winchester will determine the amount of U.S. Higher Education Act Title IV Programme assistance (Direct and PLUS Loans) that student earn if they withdraw from the university and the withdrawal process.

The University of Winchester's International Student Success team is responsible for calculating the Return of Title IV Funds (R2T4) and the Financial Department is responsible for the actual transfer of any resulting funds.

2. Process

International Student Support uses worksheets and software provided by the US Department of Education to calculate the R2T4 funds. All funds will be returned to the U.S. Department of Education within 45 days of the date of when University of Winchester determines that a student withdrew. If a student has queries regarding their Title IV programme funds, they can call the US Federal Student Aid Information Center at 1-800-4-FEDAID (1-800-433-3243). TTY users may call 1- 800-730-8913. Information is also available on *Student Aid on the Web* at www.studentaid.ed.gov.

2.1 Calculation of withdrawal

When a student who began attendance withdraws during a payment period, the amount of Title IV programme assistance that has been earned up to that point is determined by a specific formula.

In the case where a student notifies the University that he or she intends to withdraw, the student is informed of the need to complete the official withdrawal form. The member of staff advising the student is required to document the date the student notified them that they wished to withdraw and forward the relevant documentation to the central Registry department. Should the student fail to file the Withdrawal Form or if there is a lag between the notification and the completion of the form, then the earlier date of notification will be used in calculating the return to Title IV formula.

The University of Winchester maintains an attendance monitoring system that runs over the course of the year, ensuring that students are compliant with the regular attendance requirement of their student visa.

Without an official Withdrawal Form, the University will use the last date of attendance from system (Academic Engagement Dashboard/SITS Student Record System) to calculate earned Title IV funds. The date of withdrawal is the earlier of: the date the student notified the University of their intent to withdraw; or the date the student submitted the withdrawal form.

The withdrawal form can be found here:

[Forms and Documents for Students | Winchester \(omniacloud.net\)](#)

The University of Winchester will always seek to identify withdrawal dates and determine a student has withdrawn within 14 days.

In the event a student receives all failing grades for a semester, the Faculty Support and Retention Adviser (SARA) will consult with Programme Lead/Academic Engagement Dashboard to determine if the failed grades were earned or represent a lack of attendance. If it is determined that resulting grades are the result of lack of attendance, the SARA will determine the last day of attendance, and this is the date that will be used in the return to Title IV calculation. Our policy does not allow retrospective breaks in studies and withdrawals to be permitted, except where exceptional circumstances apply.

Students who do not attend any classes are ineligible for Title IV funds, and all of the loan proceeds will be returned to the lender.

2.2 Calculation of assistance earned

The amount of assistance earned is determined on a pro rata basis. If the student received (or the University received on the student's behalf) less assistance than the amount that was earned, then the student may be able to receive those additional funds. If the student received more assistance than was earned, the excess funds must be returned by the University and/or the student.

The percentage is calculated based on days completed, divided by days in a payment period, but not including leaves of absence less than five days. The payment period is the term for which the loan was certified, and the percentage attendance is calculated by dividing the number of days attended by the total number of days in the payment period.

For example, if the student completes 30% of the payment period or term of enrolment, the student has earned 30% of the assistance they were originally scheduled to receive. Once the student has completed more than 60% of the payment period or term of enrolment, all the assistance that the student was scheduled to receive for that period is considered to have been earned.

If the student did not receive all of the funds that were earned, they may be due a post-withdrawal disbursement. The University will notify the student within 30 days of the date that it has been determined the student has withdrawn of the amount of a post-withdrawal disbursement for which the student is eligible. The student may choose to accept any loan funds or to decline some or all of them. Any post-withdrawal loan funds that are disbursed, like loan funds disbursed previously, will have to be repaid by the student. International Student Success team will use the R2T4 worksheets provided by the US Department of Education to determine how much of the loan may be retained and how much must be returned.

The University of Winchester may automatically use all or a portion of the post-withdrawal disbursement (including loan funds, if the student accepts them) for tuition, fees, and accommodation charges (to the extent they are contracted with the University). For all other charges, the University needs the student's permission to use the post-withdrawal disbursement.

3. Return of Title IV funds

The student will be required to inform the University whether they wish to accept some or all of the available post-withdrawal loan funds within a specified period of time of not less than 14 days after the student is contacted by the University. The University may honour a late response but will not honour a response that is more than 180 days late. The University will only disburse post-withdrawal funds upon documented confirmation by the borrower. Any repayment by the University will be no later than 180 days after the date of determination.

There are some Title IV funds that students are scheduled to receive but which cannot be *earned* once a student withdraws because of other eligibility requirements. For example, in certain circumstances, if a first-time, first-year undergraduate student has not completed the first 30 days of their programme before withdrawal, the student will not earn any Title IV funds that he or she would have received had the student remained enrolled past the 30th day.

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

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

The University will return this amount even if it did not keep this amount of the Title IV programme funds. If the University is not required to return all of the excess funds, then the student must return the remaining amount. For any loan funds that must be returned, the student must arrange repayment in accordance with the terms of the promissory note - that is, scheduled payments are made to the holder of the loan over a period of time. Students who have received a refund of their loan proceeds before withdrawing may be required to return part or all of those funds to the lender.

Title IV funds will be returned in the following order:

1. Unsubsidized Federal Stafford loans
2. Subsidized Federal Stafford loans
3. PLUS Loans

The requirements for Title IV programme funds when students withdraw are separate from any refund policy that the University has. Therefore, in the event of withdrawal, the student may still owe funds to the University to cover unpaid institutional charges. The University may also attempt to collect from the student any Title IV programme funds that the University was required to return. The student may review a copy of the 'Refund and Compensation Policy' here: [Policies and Regulations - University of Winchester](#).

4. Leaves of Absence (LOA) and Return of Title IV funds

A Leave of Absence is a temporary interruption in a student's programme of study when a student is not in attendance for a short period but will return to complete the programme. This would not affect Title IV eligibility.

In order for an LOA to qualify as approved

1. The maximum period for a short-term leave of absence is 10 days.
2. Where the student is acutely unwell the Support to Study Policy may apply and a longer-term LOA may be considered. However, there may be visa implications requiring the student to interrupt study.

LOAs will be granted on a case-by-case basis. The situation will be generally non-academic in nature, and it must be one that leads to a reasonable expectation that the student will return from the LOA within the allowed time frame specified to complete the overall award on which they have enrolled.

All requests for LOA's will be reviewed by Visa Compliance team and appropriate academic lead. A student granted an approved LOA that meets the criteria stated above is considered to remain an enrolled University student for Title IV loan repayment purposes, not considered to have withdrawn, and no Return of Title IV calculation is required. Upon the student's return from the leave, he or she will continue to earn the Federal Student Aid previously awarded for the period.

During the LOA, the University will not assess additional institutional charges, meaning financial needs will not increase and the student will not be eligible for additional disbursements of Federal Student Aid.

5. LOA that does not meet eligibility conditions

Any LOA that does not meet all of the conditions for an approved LOA may be considered a withdrawal for Title IV purposes.

6. Students who fail to return from LOAs

Failure to return from an LOA will result in the student being withdrawn as below. The University will report that student to the US Department of Education giving the student's change in enrolment status and trigger a Return of Title IV calculation. In this event the student's withdrawal date is determined as the date that the student *began* the LOA.

7. Withdrawal

A withdrawal refers to a student's intent to completely terminate studies at the University with no expectation of return, either by the students request or by failure to return from an LOA as above. Students who withdraw will be assessed for any Return of Title IV liability.

8. Explanation of consequences of withdrawal to loan recipients

Students will be notified in advance of the LOA start date whether or not the LOA meets the above conditions, and the financial and academic consequences of an LOA that does not meet eligibility, to enable the student to make an informed decision about withdrawal.

Equality Impact Assessment	
Summary of process undertaken to determine equality impacts:	<p>Assurance of access, equity and inclusivity and that no process or required procedure places an unfair advantage or disadvantage for any person possessing, associated with or perceived to be possessing any of the protected characteristics as defined in the Equalities Act 2010.</p> <p>To also ensure that UKVI regulations and sponsor guidance are followed for Student Route Visa holders and those on other visa sponsorship (where appropriate).</p>
University Committee (name/ date) where equality impacts discussed (maybe Committee of approval, or another):	Academic Regulations Policies and Procedures Committee and Senate
Has this policy been screened to ensure compliance with the University's Free Speech expectations?	Yes
Identified equality impact(s) on colleagues and students (i.e. any specific impacts related to this policy that may positively impact or cause disadvantage for people due to one or more protected characteristic)	
Protected Characteristic	Impact(s) identified and any action(s)/mitigation(s) to address these impact(s), as necessary.
Age	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Disability	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Gender Identity	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Marriage/Civil Partnership	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Pregnancy and Maternity	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Race (incl. nationality)	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.

Religion and Belief	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Sex	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.
Sexual Orientation	Where applicable, this policy is subject to the financial regulations of relevant non-UK jurisdictions, particularly where these impact international students or staff.