

## UNIVERSITY OF GASTRONOMIC SCIENCES

### RETURN TO TITLE IV FUNDS POLICY (R2T4)

U.S. law specifies how the University of Gastronomic Sciences (UNISG) must determine the amount of Title IV program assistance (Direct Loans) that students earn if they withdraw from school. See section on Withdrawals for specific information regarding Leaves of Absence (LOA) and the withdrawal process. The UNISG Financial Aid office is responsible for calculating R2T4 and the Administration Office is responsible to actually transfer the funds. The Financial Aid office uses worksheets and software provided by the U.S. Department of Education (ED) to calculate the R2T4 funds. All funds must be returned to the lender within 45 days of the last date of attendance. Students with questions about their Title IV program funds can call the 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.gov](http://www.studentaid.gov).

#### **Attendance and Withdrawal**

When a student withdraws during a payment period, the amount of Title IV program assistance that has been earned up to that point is determined by a specific formula. The date of withdrawal is the earlier of the date the student notified the Registrar or Program Director of their intent to withdraw or the date the student submitted the withdrawal form. If the student received (or the school received on the student's behalf) less assistance than the amount that was earned, 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 school and/or the student.

The amount of assistance earned is determined on a pro rata basis. The payment period is the semester for which the loan was certified and the percent of attendance is calculated by dividing the number of days attended by the total number of days in the payment period. (See below for further details on percentage calculations and period of attendance required to earn 100% of loan funds.) If the student did not receive all of the funds that were earned, he or she may be due a post-withdrawal disbursement (PWD). If the PWD includes loan funds, the student may choose to decline the loan funds so that additional debt is not incurred. The Financial Aid office will use the R2T4 worksheets as provided by ED to determine how much of the loan may be retained and how much must be returned.

UNISG may automatically use all or a portion of the student's PWD (including loan funds, if the student accepts them) for tuition fees. For all other school charges, UNISG needs the student's permission to use the post-withdrawal disbursement.

UNISG is required to take attendance in classes and study trips, and students must participate in a minimum of 70% of classes and study trip events in order to remain enrolled. Attendance in classes and activities is compulsory. Individual student absences may not exceed 30% of the total number of activity hours. Any absence exceeding this limit, if due to illness or otherwise serious reasons (backed by adequate evidence), will be evaluated by the Program Director and the Faculty Council.

The Program Director will consult with the student's faculty to determine if the student never attended classes or to verify the last date of attendance. Without an official Withdrawal Form, UNISG will use the last date of attendance to compute the R2T4 formula, and this date will be determined no later than 14 calendar days after the student's last date of attendance.

Within 30 days of the determination of a student's last date of attendance, UNISG will perform the Return of Funds calculation and notify the student of the results, in writing, including any overpayments

or post-withdrawal disbursements (PWDs). The student will then have 14 days to accept or decline the PWD, and the PWD or credit to the student's account will take place no more than 90 days of the determination of a student's last date of attendance. If the student does not respond within the allocated time frame, UNISG is not required to issue the PWD and will notify the student in writing of its decision to do so. Within 45 days of the determination of a student's last date of attendance, UNISG will perform the Return of Funds to ED.

In the case where a student notifies the Program Director that he or she intends to withdraw, the student will be informed of the need to complete the Official Withdrawal Form, and the Program Director will document the date the student notified them and share that information with the UNISG Registrar. The date indicated on the Withdrawal Form will be the date of withdrawal used in calculated Return of Funds. Should the student fail to file the Withdrawal Form or there is a lag between the notification and the filing of the form, the earlier date of notification will be used in calculating the R2T4 formula. If a student chooses to rescind his or her decision to withdraw prior to the date specified in the Official Withdrawal Form or the date of notification of the Program Director, the student will be required to complete a Recission of Withdrawal Form, available from the UNISG Registrar. If a student stops attending subsequent to recission, the withdrawal date is the original date of notice to withdraw.

For Unofficial Withdrawals, see below for definitions and the determination of withdrawal dates.

#### Official Withdrawal

A withdrawal refers to a student's intent to completely terminate studies at UNISG with no expectation of return. Students who subsequently decide to return to their studies must re-apply for admission through UNISG Admissions. The date of withdrawal is determined as the student's last recorded date of attendance.

#### Unofficial Withdrawal

An unofficial withdrawal refers to the case in which a student terminates studies at UNISG and in which UNISG does not receive notice from the student that the student has ceased or will cease attending the school. The date of withdrawal is determined as the student's last recorded date of attendance.

Note: Students who withdraw from courses or the program receive a grade of "W" on their transcript. The grade is considered the same as an "FX" grade (failing grade) in calculating the quantitative aspect of the Satisfactory Academic Progress standards and may affect the student's future eligibility for Financial Aid. If the student completely withdraws from all classes, receives all F's, W's and Incompletes before 60% point in the term, the student may have to repay any unearned financial aid funds that were already disbursed.

In the event a student receives all failing grades for a semester, the Program Director will contact the faculty members to determine if the "FX" (failing) grades were earned or represent a lack of attendance. In the event it is determined that those grades were the result of lack of attendance, the Program Director and faculty will attempt to determine the last day of attendance and use that date in the R2T4 calculations. Students who do not attend even one class are ineligible for Title IV funds and all of the loan proceeds will be returned to the lender.

## **Leaves of Absence (LOAs) and Withdrawals - Definitions**

### **Approved Leaves of Absence (LOAs)**

An LOA is a temporary suspension in a student's program of study that cannot exceed 180 days within a 12-month period. LOA refers to the specific time period during a program when a student is not in attendance and will return to complete the program.

According to [UNISG Student and Program Enrollment Regulations](#) (art. 5.2) Students may benefit from the temporary suspension of their academic career in the following cases, by presenting the appropriate form to the Academic and Registrar Office:

- Pregnancy/birth/child adoption (duly documented) involving female students
- Birth/adoption of each child (duly documented) for male students who acknowledge paternity
- Serious and prolonged illnesses (duly documented)

Students, through the presentation of the appropriate form to the Academic and Registrar Office, may request authorization from the Faculty Council to temporarily suspend their academic career in order to study abroad. Students returning from a LOA are not required to re-apply for admission.

An LOA must meet certain conditions to be counted as a temporary interruption in a student's education instead of being counted as a withdrawal, requiring UNISG to perform a Return of Funds calculation. If an LOA does not meet the conditions and the student is considered to have ceased attendance and to have withdrawn from the school, and the school is required to perform a Return of Funds calculation. In such case, the date of withdrawal is determined as the student's last recorded date of attendance.

In order for an LOA to qualify as an approved LOA:

1. All requests for LOAs must be submitted in writing to the Program Director and include the reason for the student's request. The form must be signed and dated by the student and specify the date the student wants the LOA to begin and end.
2. Students must apply in advance for an LOA unless unforeseen circumstances prevent the student from doing so.
3. The reason given for the LOA request must be generally non-academic in nature and must be one that leads to a reasonable expectation that the student will return from the LOA within the allowed time frame.
4. The LOA, together with any additional leaves of absence, must not exceed a total of 180 days in any 12-month period including days in which school is not in session.

All requests for LOAs will be reviewed by the Program Director, the University Registrar and the Financial Aid Advisor. The student will be notified in writing by the Program Director of UNISG's decision.

During the LOA, the institution will not assess the student any additional institutional charges, the student's financial need will not increase, and therefore, the student will not be eligible for any additional disbursements of Federal Student Aid.

If the student is a Direct Loan recipient, the school will explain to the student, prior to granting the LOA, the effects that the student's failure to return from an LOA may have on the student's loan repayment terms, including the expiration of the student's grace period.

A student granted an LOA that meets the criteria stated above is not considered to have withdrawn, and no Return of Funds calculation is required. Upon the student's return from the leave, he or she continues to earn the Federal Student Aid previously awarded for the period.

### Unapproved Leaves of Absence

UNISG may grant a student an LOA that does not meet the conditions to be an approved LOA for Title IV purposes (for example, for academic reasons). However, any LOA that does not meet all of the conditions for an approved LOA is considered a withdrawal for Title IV purposes. In such case, the date of withdrawal is determined as the student's last recorded date of attendance.

### LOA and Withdrawal Request Forms

The form required by UNISG to request a LOA or a Withdrawal is available in the Registrar's Office (Segreteria Studenti).

### Completion of coursework upon return

In as much as approved leaves of absence are viewed as temporary interruptions in a student's attendance, and since the academic programs at UNISG are considered term-based programs, where the payment period is the term, a student returning from a LOA must do so at a time when he or she can complete the term in order to complete the payment period and be eligible to receive a second or subsequent disbursement. Therefore, for students enrolled in credit-hour term programs, in order for an LOA to be an LOA, UNISG will allow a student returning from an LOA to complete the coursework that he or she began prior to the LOA.

### Students who return earlier than anticipated

UNISG may permit a student to return to class before the expiration of the student's LOA in order to review material previously covered. However, until the student has resumed the academic program at the point where he or she began the LOA, the student is considered to still be on the approved LOA. The days the student spends in class before the course reaches the point at which the student began his or her LOA must be counted in the 180 days maximum for an approved leave of absence. A student repeating coursework while on LOA must reach the point at which he or she interrupted training within the 180 days of the start of the student's LOA.

### Students who fail to return from LOAs

If a student does not return to UNISG at the expiration of an approved LOA (or a student takes an unapproved LOA), the student's withdrawal date is the last date of attendance.

### Explanation of consequences of withdrawal to loan recipients

A student who is granted an approved LOA is considered to remain in an in-school status for Title IV loan repayment purposes. If a student on an approved LOA fails to return, UNISG will report to ED the student's change in enrollment status as of the withdrawal date. One possible consequence of not returning from an LOA is that a student's grace period for a Title IV program loan might be exhausted. Therefore, in order for a LOA to be an approved LOA, prior to granting a leave of absence, UNISG will inform a student who is a Title IV loan recipient of the possible consequences a withdrawal may have on the student's loan repayment terms, including the exhaustion of the student's grace period.

## **Calculation of Loan Funds**

The amount of the Title IV program funds that a student has earned upon withdrawal will be based on the student's rate of attendance, calculated by dividing the total number of days that the student has been in attendance by the total number of days in the payment period. For example, if the student completes 30% of the payment period or period of enrollment, 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 period of enrollment, all the assistance that the student was scheduled to receive for that period will be considered to have been earned.

Institutionally scheduled breaks of 5 or more consecutive days are excluded from both the numerator and the denominator of the R2T4 calculation. Breaks of less than 5 consecutive days are included in the R2T4 calculation.

For a first-time, first-year student who does not complete the first 30 days of the program before withdrawal, no loan funds will be earned, that is, those funds that the student would have received had he or she remained enrolled past the 30<sup>th</sup> day. If the student receives (or the school receives on behalf of the student) excess Title IV program funds that must be returned, the UNISG 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 school must return this amount even if it did not keep this amount of the Title IV program funds. If the school is not required to return all of the excess funds, the student must return the remaining amount. For any loan funds that must be returned, the student must repay 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 Direct Loans
2. Subsidized Direct Loans
3. PLUS Loans

The following calculation has been provided by the US Department of Education to calculate the amount of unearned funds:

Number of days enrolled on the program / Total Number of days in the payment period  
= Amount of loan funds earned

As to the timeline for reimbursement, should the student have a credit balance, it must be disbursed as soon as possible and no later than 14 days after the calculation of an R2T4.





#### Example Calculation of Title IV entitlement

	Payment Period	Total number of days	Term dates	Non study days	Study days	Post 60% date for R2T4
Undergraduate program 2024	Sept 19, 2024 - February 28, 2025	162	Sept 19, 2024 – Dec 15, 2024	50	112	Dec 25, 2024
	March 1, 2025 – Sept 18, 2025	201	Jan 22, 2025 – June 14, 2025	63	138	June 29, 2025
Master Program, autumn 2024	Oct 10, 2024 – March 31, 2025	172	Oct 10, 2024 – March 31, 2025	54	118	Jan 21, 2025
	April 1, 2025 – October 9, 2025	191	April 1, 2025 – October 9, 2025	59	132	July 24, 2025

The requirements for Title IV program funds when a student withdraws are separate from any refund policy that the school may have. Therefore, the student may still owe funds to UNISG to cover unpaid institutional charges. UNISG may also charge for any Title IV program funds that the school was required to return. Students may receive a copy of the refund policy from the Administration Office or download it from the UNISG website at [www.unisg.it](http://www.unisg.it) (under Regulations).

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