

FINANCIAL AID INFORMATION – GENERAL INFORMATION

Financial assistance in the form of loans, grants, and scholarships is available to eligible students. Ohio Business College makes every possible effort to aid those students who need financial assistance in order to complete their education.

A prospective student and their family are encouraged to visit the Financial Aid Office at Ohio Business College for detailed information, forms, and assistance in completing application forms for financial aid programs. Financial aid awards are subject to eligibility requirements, verification, enrollment status, satisfactory academic progress, and other applicable federal, state, and institutional requirements. Students remain responsible for any institutional charges not covered by approved financial aid or other authorized resources.

Financial aid eligibility is determined based on applicable federal, state, institutional, and program-specific requirements. Federal student aid eligibility may be based on information reported on the FAFSA, the student's Student Aid Index (SAI), cost of attendance, enrollment status or enrollment intensity, and other program-specific eligibility requirements. When those resources are not adequate to meet the cost of a student's education, Ohio Business College provides options to help the student finance their education. The type and amount of financial aid a student may receive depends on the student's eligibility for each program and may be affected by financial need, Student Aid Index (SAI), cost of attendance, enrollment status or enrollment intensity, program length, satisfactory academic progress, remaining eligibility, annual or aggregate limits, and the availability of funds. Changes in a student's eligibility or enrollment may affect the student's financial aid awards.

In general, students must meet applicable eligibility requirements to receive federal student aid. State financial aid programs may have additional or different eligibility requirements.

Students must:

1. Meet applicable financial need or other eligibility requirements for the specific financial aid program.
2. Have a high school diploma or its recognized equivalent, or otherwise meet applicable federal requirements regarding completion of secondary education.
3. Be enrolled as a regular student in an eligible program for the purpose of obtaining a degree, certificate, diploma, or other recognized educational credential, as applicable to the program and institution.
4. Be a U.S. citizen, U.S. national, or eligible noncitizen, as defined by applicable federal student aid requirements.
5. Provide a valid Social Security number, unless otherwise permitted under federal student aid requirements.

6. Maintain satisfactory academic progress (SAP) in accordance with the institution's SAP policy and applicable federal requirements.
7. Not be in default on a federal student loan or owe an unresolved overpayment on a federal student aid grant or other Title IV program, unless the student has resolved the default or overpayment or otherwise regained eligibility in accordance with federal requirements.

GRANTS, LOANS, AND SCHOLARSHIPS

Grants and scholarships are forms of financial assistance that generally do not have to be repaid, provided the student meets all applicable eligibility requirements. In certain circumstances, a student may be required to repay all or a portion of a grant or scholarship.

Loans are funds borrowed to help pay for educational expenses and must generally be repaid, with applicable interest and fees, according to the terms and conditions of the loan program.

The following types of financial assistance may be available to students who meet the applicable eligibility requirements:

1. Meet applicable financial need or other eligibility requirements for the specific aid program.
2. Have a high school diploma or its recognized equivalent, or otherwise meet applicable federal requirements regarding completion of secondary education.
3. Be enrolled as a regular student in an eligible program for the purpose of obtaining a recognized educational credential, as applicable.
4. Be a U.S. citizen, U.S. national, or eligible noncitizen, as defined by federal student aid requirements.
5. Provide a valid Social Security number, unless an exception applies under federal student aid requirements.
6. Maintain satisfactory academic progress (SAP) in accordance with OBC's SAP policy and applicable federal requirements.
7. Not be in default on a federal student loan or owe an unresolved federal student aid overpayment, unless the student has resolved the matter or otherwise regained eligibility under applicable federal requirements.

Selective Service registration is not a federal student aid eligibility requirement.

Financial Aid Programs Available Through OBC

Subject to program availability and student eligibility, financial assistance may include:

- Federal Pell Grant
- Federal Supplemental Educational Opportunity Grant (FSEOG)
- Federal Direct Subsidized Loans
- Federal Direct Unsubsidized Loans
- Federal Direct PLUS Loans, when applicable
- Federal Work-Study (FWS)

- Ohio Department of Higher Education financial assistance programs
- Veterans educational benefits
- LEADS! Scholarship Program
- Tuition Options repayment/payment assistance, when offered
- Keystone private education loans, when offered
- In House Payment Plans

Grants, Scholarships, and Loans

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Loans are funds borrowed to help pay for educational expenses and must generally be repaid according to the terms and conditions of the loan, including applicable interest and fees.

Federal Financial Aid Assistance Programs

Federal Pell Grant

The Federal Pell Grant Program provides grant assistance to eligible undergraduate students. A Pell Grant generally does not have to be repaid, except in circumstances in which an overpayment or other repayment obligation is created under federal requirements.

Eligibility

Pell Grant eligibility is determined under federal law and may be based on Maximum Pell Grant eligibility, Minimum Pell Grant eligibility, or calculated Pell Grant eligibility. Eligibility and award amounts may be affected by the student's FAFSA information, SAI, Pell Grant cost of attendance, enrollment intensity, remaining Lifetime Eligibility Used (LEU), and other applicable federal requirements.

Beginning with the 2026–2027 award year, a student with an SAI equal to or greater than twice the maximum Pell Grant award is generally ineligible for a Pell Grant, subject to the federal Special Rule for certain dependents of deceased U.S. Armed Forces servicemembers and public safety officers.

A student who has earned a bachelor's degree generally is not eligible for a Pell Grant, except for limited federal exceptions, including certain eligible postbaccalaureate teacher certification or licensure programs and eligible workforce programs. Students who have earned a graduate or professional degree generally are not eligible.

How to Apply

Students must submit a FAFSA form for each award year for which they seek federal student aid. OBC uses FAFSA information and other required eligibility information to determine eligibility for federal student aid.

2026–2027 Award Amounts

For the 2026–2027 award year, the maximum Federal Pell Grant award is \$7,395 and the minimum Pell Grant award is \$740. Actual awards vary based on individual eligibility and

applicable federal awarding rules. Eligible students may, in some circumstances, receive up to 150% of their Scheduled Award through Year-Round Pell.

Pell Grant Lifetime Eligibility

Federal Pell Grant eligibility is generally limited to 600% LEU, which is equivalent to six full Scheduled Awards. A student's remaining eligibility may be less than a full award when prior Pell or converted Iraq and Afghanistan Service Grant eligibility has been used.

Concurrent Enrollment

A student may not receive Pell Grant funds for concurrent enrollment at more than one institution for the same enrollment period, except as permitted under applicable federal rules.

Disbursement of Funds

OBC disburses Pell Grant funds in accordance with applicable federal payment-period, attendance, and disbursement requirements. Funds may be credited to eligible institutional charges and any resulting Title IV credit balance is handled in accordance with applicable federal requirements.

Federal Supplemental Educational Opportunity Grant (FSEOG)

FSEOG is a limited-fund federal grant program for eligible undergraduate students with exceptional financial need. OBC awards FSEOG in accordance with its written selection and awarding procedures and applicable federal requirements.

Eligibility and Awarding

Students must complete the FAFSA and meet applicable federal student eligibility requirements. OBC considers exceptional financial need and must follow its established procedures for selecting recipients. Pell Grant eligibility must be confirmed before FSEOG is disbursed. Awards are subject to available program funds.

OBC's institutional FSEOG award amount and disbursement schedule are established annually and are subject to available funding and the institution's approved awarding procedures.

Disbursement

OBC disburses FSEOG funds in accordance with applicable federal payment-period and disbursement requirements.

Federal Direct Loans

The William D. Ford Federal Direct Loan Program includes Direct Subsidized Loans, Direct Unsubsidized Loans, and Direct PLUS Loans. Eligibility, annual and aggregate borrowing limits, interest rates, fees, and repayment terms are established under federal law and may change.

- Direct Subsidized Loans are available to eligible undergraduate students who demonstrate financial need.
- Direct Unsubsidized Loans are available to eligible students and generally do not require demonstrated financial need.

- Direct PLUS Loans may be available to eligible parents of dependent undergraduate students and, where applicable, eligible graduate or professional students, subject to federal requirements.

Applying for a Federal Direct Loan

Students must submit a FAFSA form and meet applicable federal eligibility requirements. OBC will provide an aid offer showing the types and amounts of federal student aid for which the student is eligible. Students may accept, reduce, or decline offered loans, subject to institutional procedures and federal limits.

Before the first disbursement of a Direct Loan, first-time borrowers generally must complete required entrance counseling and sign a legally binding Master Promissory Note (MPN), unless an applicable exception applies.

Responsible Borrowing

Students should borrow only what they reasonably need and should understand their repayment obligations before accepting a loan. A federal student loan is a legal obligation that generally must be repaid even if the student does not complete the program, is unable to obtain employment, or is dissatisfied with the education received.

- Keep track of the total amount borrowed and estimated future repayment obligations.
- Review and retain loan disclosures and promissory notes.
- Keep contact information current with the school and loan servicer.
- Contact the loan servicer promptly if repayment difficulties occur.
- Complete required exit counseling when required by federal regulations.

Federal Work-Study (FWS)

Federal Work-Study provides part-time employment opportunities to eligible students with financial need, subject to available funding. Students must complete the FAFSA and meet applicable federal and institutional eligibility requirements.

FWS employment may be on campus or, when permitted, with eligible off-campus employers. The program encourages community service and, when practicable, employment related to the student's course of study.

Students are paid for hours actually worked. FWS earnings are not automatically credited to a student's institutional account unless the student authorizes an eligible payment arrangement. OBC establishes student wages and work schedules in accordance with applicable federal, state, and institutional requirements. Students may not earn more than their authorized FWS award, and work schedules may be limited by enrollment, academic progress, available funding, and institutional policy.

Students interested in FWS should contact the Financial Aid Office. FWS funds are limited and employment is not guaranteed to every eligible student.

Ohio State Financial Assistance Programs

Ohio Business College may assist eligible students with Ohio Department of Higher Education (ODHE) financial assistance programs for which the institution and student are eligible. Program availability, funding, residency requirements, enrollment requirements, application procedures, and award amounts are determined by the State of Ohio and may change.

Ohio College Opportunity Grant (OCOG)

OCOG is administered by ODHE for eligible Ohio residents who meet applicable program requirements and attend eligible Ohio institutions. Students generally must complete the FAFSA, and no separate OCOG application is typically required unless otherwise specified by ODHE. Eligibility and award amounts are determined under current ODHE rules and available funding.

OBC will administer OCOG in accordance with ODHE requirements. Students must meet all applicable eligibility requirements at the time of awarding and disbursement.

Other Ohio Programs

Depending on current program availability and student eligibility, OBC may provide information or assistance regarding programs such as College Adoption Grant, Nurse Education Assistance Loan Program (NEALP), Ohio Hidden Heroes, Ohio Safety Officers College Memorial Fund, Ohio War Orphans and Severely Disabled Veterans' Children Scholarship, and other state-sponsored programs. Students should consult current ODHE program information for specific requirements.

Veterans Educational Benefits

Eligible veterans, service members, dependents, and survivors may qualify for educational assistance administered by the U.S. Department of Veterans Affairs (VA). Eligibility, benefit amounts, and application requirements are determined by the VA.

Students seeking VA educational benefits should contact OBC's designated School Certifying Official or appropriate institutional representative and the VA for current eligibility and certification requirements.

Protection During Pending VA Payments

OBC will comply with applicable requirements of the Veterans Benefits and Transition Act and other applicable law regarding covered individuals using VA educational assistance. Subject to applicable documentation and certification requirements, OBC will not impose prohibited penalties or adverse actions solely because VA educational assistance is pending.

Ohio Business College honors the Veterans Benefits and Transition Act of 2018, Title I – Education, Section 104 which states to allow individuals to stay enrolled in courses of education pending receipt of educational assistance from the Department of Veterans Affairs. OBC will not have any adverse action against a student due to a late payment of tuition and/or fees from VA.

Scholarship Assistance Programs

LEADS! Scholarship Program

The LEADS! Scholarship Program and its current eligibility criteria, award process, deadlines, and administration are determined by the sponsoring organization. OBC will provide information

about the program when available. Students should consult the current program application and sponsoring organization for official requirements.

Private Funding Assistance

Private Education Loans

Private education loans are not federal student loans. Students should carefully compare federal and private borrowing options before obtaining a private education loan. Private loan terms, eligibility, credit requirements, interest rates, repayment options, fees, and borrower benefits are determined by the lender.

Keystone Private Education Loan Program

If OBC continues to make Keystone private education loans available as an option, current loan information must be based on the lender's most current disclosures and program materials. Eligibility, borrowing limits, residency requirements, cosigner requirements, interest rates, repayment plans, fees, and terms are subject to change. Students should review the lender's current disclosures before applying.

Private loan information in this document is intentionally not presented as a guaranteed term sheet. OBC should update any detailed lender-specific terms whenever the lender changes its program.

Tuition Options Payment Assistance

Tuition Options is a third-party servicer used in connection with institutional balances and payment arrangements. OBC is responsible for its institutional lending or payment arrangement decisions, while the servicer may perform account-management functions such as billing, payment processing, and payment-plan administration.

Students who have a remaining institutional balance after all applicable financial aid and other resources are applied should meet with a Financial Aid Administrator or other authorized OBC representative to review available options and establish an approved payment arrangement, if eligible.

Current institutional loan limits, minimum balances, interest rates, fees, repayment terms, and other conditions are governed by OBC's current written Tuition Options policy and applicable agreements. Those terms should be maintained separately and updated whenever institutional policy changes.

In-House Payment Arrangements

Ohio Business College understands that some students may have an outstanding balance after all applicable financial aid, scholarships, grants, loans, and other resources have been applied to their student account. Students who have an eligible remaining balance may be offered an in-house payment arrangement to assist them in meeting their financial obligation to the College.

An in-house payment arrangement is an agreement between the student and Ohio Business College that allows an eligible outstanding balance to be paid according to approved payment terms. Eligibility for an in-house payment arrangement, the amount financed, payment amounts,

and other terms and conditions are determined in accordance with Ohio Business College policies and the student's individual circumstances.

Students are expected to make all required payments in accordance with their approved payment arrangement. **Payments under an in-house payment arrangement are due on the first day of each academic quarter**, unless otherwise specified in the student's written payment agreement.

It is the student's responsibility to ensure that payments are made on or before the scheduled due date. Students experiencing financial difficulties that may affect their ability to make a scheduled payment should contact the Financial Aid Office or appropriate College representative as soon as possible to discuss their account.

Failure to make payments as agreed may result in the student becoming delinquent on their institutional account and may affect the student's eligibility for continued participation in an in-house payment arrangement or other institutional payment options. Any collection activity or additional action related to a delinquent balance will be handled in accordance with applicable law and Ohio Business College policies.

In-house payment arrangements are separate from federal student aid programs. Students are encouraged to explore all available financial aid options before entering into an institutional payment arrangement. Ohio Business College will continue to administer and disburse Title IV federal student aid in accordance with applicable federal requirements.

Important Notice

Financial aid laws, regulations, funding levels, award amounts, and program requirements may change. OBC will administer financial assistance according to the federal, state, lender, VA, and institutional requirements in effect for the applicable award year. When there is a conflict between this general information and a controlling law, regulation, official program requirement, or current award-year guidance, the controlling authority will govern.

Federal Supplemental Educational Opportunity Grant (FSEOG) Policy

Regulatory References

- 34 CFR 676.9
- 34 CFR 676.10
- 34 CFR 676.16
- 34 CFR 676.20
- Applicable provisions of 34 CFR Part 668
- Federal Student Aid Handbook, Volume 6, Chapter 6

Purpose

This policy establishes the institutional procedures for awarding, packaging, disbursing, monitoring, and reconciling Federal Supplemental Educational Opportunity Grant (FSEOG) funds at Ohio Business College (OBC).

OBC is committed to administering FSEOG funds in accordance with applicable federal laws and regulations and to ensuring the fair, equitable, and consistent treatment of eligible students. Because FSEOG is a limited-funding, Campus-Based program, awards are made only to the extent that funds remain available.

Student Eligibility Requirements

To receive an FSEOG award, a student must:

- Demonstrate financial need;
- Meet all applicable general Title IV student eligibility requirements;
- Be enrolled or accepted for enrollment as an undergraduate student in an eligible program; and
- Not have previously earned a bachelor's degree or first professional degree.

OBC will make FSEOG funds reasonably available, to the extent that funds are available, to eligible students. OBC's selection and awarding procedures may not exclude otherwise eligible students or groups of students from consideration.

Eligibility is determined by a Financial Aid Administrator during the Title IV review and packaging process.

Institutional Standard Award Amount

OBC's standard institutional FSEOG award is **\$100 per quarter/payment period**, subject to available funds and the student's continued eligibility.

Any FSEOG award amount above the standard institutional award must receive written approval from the Regional Financial Aid Director.

At the conclusion of the institutional awarding cycle, if FSEOG funds remain available, additional FSEOG funds may be awarded to eligible students based on remaining financial need and institutional selection priorities, up to the applicable federal maximum award amount.

The federal minimum FSEOG award is \$100 per academic year, except that the minimum may be prorated for a student enrolled for less than a full academic year. The maximum FSEOG award is generally \$4,000 per academic year. A maximum award of \$4,400 may be made to an eligible student participating in an approved study-abroad program for which academic credit is awarded by the home institution.

Special Institutional Adjustment Effective Fall 2025 Quarter Only:

LPN-to-RN program students who are otherwise eligible for FSEOG may receive a **\$300 per quarter institutional adjustment** to address a prior packaging error.

This adjustment applies only to the identified population and period and remains subject to the student's continued eligibility and the availability of FSEOG funds.

Selection of Recipients and Priority Groups

OBC follows the federally required FSEOG selection priority requirements while maintaining institutional procedures designed to distribute limited FSEOG funds throughout the award year.

First Selection Group: Pell Grant Recipients

The first selection group consists of students with the lowest eligible Student Aid Indexes (SAIs) who will receive a Federal Pell Grant during the same award year.

OBC will give priority to eligible students within this group based on the lowest SAI and consistent application of the institution's negative-SAI methodology.

For purposes of OBC's institutional selection procedures, **all negative SAIs, from -1500 through -1, will be treated as equivalent to an SAI of zero for FSEOG selection purposes.** This methodology will be applied consistently to all students considered for FSEOG.

A student who receives a Pell Grant at any time during the award year may be considered part of the first selection group for that award year. The student is not required to receive a Pell Grant in the same payment period in which the FSEOG is disbursed.

Second Selection Group: Eligible Non-Pell Recipients

If FSEOG funds remain after eligible Pell Grant recipients have been considered in accordance with the first selection group requirements, OBC may award remaining funds to eligible undergraduate students with the lowest SAIs who will not receive a Pell Grant during the award year.

This group includes otherwise eligible students who are no longer eligible for a Pell Grant because they have reached the 600% Federal Pell Grant Lifetime Eligibility Used (LEU) limit.

Students in this group will be prioritized based on the lowest SAI and demonstrated financial need.

Institutional Awarding Categories

To help ensure that FSEOG funds remain reasonably available throughout the award year, OBC may establish institutional awarding categories based on factors such as:

- New or continuing student status;
- Campus;
- Program;
- Enrollment period or start date;
- Enrollment patterns; and
- Historical and projected student enrollment.

Within each institutional category, OBC will apply the federally required FSEOG selection priorities. Eligible students with the lowest SAIs who will receive a Pell Grant during the award year must receive priority over eligible students who will not receive a Pell Grant.

Institutional categories may not be used to exclude otherwise eligible students or groups of students from consideration for FSEOG.

Fund Allocation at the Campus Level

The annual FSEOG allocation is divided among OBC campuses using historical, current, and projected enrollment information.

Campus allocations may be further divided between new and continuing students to support the reasonable availability of FSEOG funds throughout the award year.

New Students

Funds may be allocated among anticipated start dates based on historical and projected enrollment patterns.

Financial Aid Administrators may identify and tentatively package eligible students during the financial aid estimate and packaging process. All tentative awards remain subject to final verification of Title IV eligibility, FSEOG eligibility, institutional selection priority, available funds, and Pell Grant eligibility, when applicable.

Continuing Students

Eligible continuing students may be considered for FSEOG awards during each applicable term or payment period until available institutional and campus allocations are exhausted.

Awarding and Packaging Procedures

New Students

1. Financial Aid Administrators may tentatively package FSEOG for students who appear eligible based on available financial aid information and OBC's established selection procedures.
2. Final FSEOG eligibility and award amounts must be confirmed before disbursement.
3. Awards may be packaged for the applicable academic year and scheduled for disbursement by payment period.
4. OBC must document the student's eligible SAI used for FSEOG selection and confirm Pell Grant eligibility before disbursing FSEOG to a first-selection-group student.
5. If a student's Pell Grant eligibility is lost before the FSEOG disbursement, the FSEOG award must be reviewed and adjusted or canceled as required by federal regulations.

Continuing Students

1. Continuing students will be considered according to OBC's established institutional categories and federal selection priorities.
2. FSEOG awards may be made by quarter or payment period, subject to available funds and the student's continued eligibility.
3. Awarding will continue until the applicable FSEOG allocation is exhausted.

Reclaimed Funds

Reclaimed funds include FSEOG funds that become available because of an adjustment, cancellation, loss of eligibility, withdrawal, or other required change to a student's award.

Reclaimed funds will be returned to the applicable available FSEOG fund balance and may be re-awarded to eligible students in accordance with:

1. Federal FSEOG selection priorities;
2. OBC's institutional awarding categories;
3. The student's SAI and Pell Grant eligibility status, as applicable;
4. Demonstrated financial need; and
5. Available funds.

Reclaimed funds may be re-awarded until the applicable FSEOG allocation is exhausted.

Award Amounts

OBC's institutional standard award is **\$100 per term/payment period**, subject to available funds and the student's continued eligibility.

The applicable federal award limits are:

- **Minimum Award:** \$100 per academic year, except that the minimum may be prorated for a student enrolled for less than a full academic year;
- **Maximum Award:** \$4,000 per academic year; and

FSEOG awards may be disbursed in equal or unequal installments across payment periods, provided the award is administered in accordance with applicable federal requirements, institutional policy, and the student's financial need.

Frequency and Method of Disbursement

FSEOG awards will be scheduled and disbursed in accordance with applicable Title IV disbursement requirements and OBC's academic calendar and payment period structure.

Award amounts may be divided among the payment periods in the student's academic year. Adjustments may be made when necessary to reflect changes in eligibility, enrollment, financial need, or other circumstances affecting the student's Title IV eligibility.

Before each disbursement, OBC will ensure that the student remains eligible to receive the FSEOG funds.

Pell Grant LEU Consideration

A student who has reached the 600% Federal Pell Grant Lifetime Eligibility Used limit may remain eligible for FSEOG if the student otherwise meets FSEOG eligibility requirements.

Students who are no longer eligible for a Pell Grant because they have reached the Pell LEU limit are considered in OBC's **Second Selection Group** and may be awarded FSEOG only after the applicable priority requirements for eligible Pell Grant recipients have been met.

Internal Controls and Reconciliation

OBC will maintain appropriate internal controls to ensure accurate administration and reconciliation of FSEOG funds.

At a minimum:

- FSEOG program and fiscal records will be reconciled monthly;
- Federal drawdowns and disbursement activity will be compared with institutional records and applicable federal systems;
- Anticipated and actual disbursements will be reviewed for accuracy;
- Discrepancies will be investigated and resolved promptly;
- Adjustments, cancellations, and returned funds will be accurately recorded; and
- Records will be maintained in accordance with applicable federal recordkeeping requirements.

Compliance and Documentation

OBC will maintain documentation supporting:

- Student Title IV and FSEOG eligibility;
- The eligible SAI used for FSEOG selection;
- Pell Grant eligibility confirmation, when applicable;
- Institutional selection category and priority group assignment;
- Award calculations and approvals;
- Disbursement and adjustment records;
- Reclaimed and re-awarded funds;
- Reconciliation and internal control activities; and
- Any required institutional approvals for awards above the standard institutional award amount.

OBC will apply its written FSEOG selection procedures consistently to ensure compliance with the federal requirement that FSEOG funds be reasonably available, to the extent funds are available, to eligible students.

Policy Administration and Review

This policy will be administered by the Ohio Business College Financial Aid Office under the oversight of the Regional Financial Aid Director.

The policy will be reviewed annually and updated as necessary to reflect changes in federal laws, regulations, Federal Student Aid guidance, institutional practices, or available funding.

Professional Judgment

Effective Date: July 1, 2026

Review Cycle: Annually or as required by changes in federal law, regulation, or Federal Student Aid guidance

Regulatory References

- Higher Education Act of 1965, as amended, Section 479A
- 34 CFR Part 668
- 34 CFR 685.301(a)(8)
- Federal Student Aid Handbook, Application and Verification Guide, Chapter 5: Special Cases
- Applicable Federal Student Aid guidance

Purpose

The purpose of this policy is to establish procedures for the consistent, individualized, and documented exercise of professional judgment by Ohio Business College (OBC) Financial Aid Administrators (FAAs).

Professional judgment may be used only when permitted under applicable federal law and regulations and must be exercised on a **case-by-case basis**. Professional judgment decisions must be based on the individual student's circumstances and supported by appropriate documentation.

OBC will not use professional judgment to circumvent federal law or regulations, waive general student eligibility requirements, or make adjustments that are unreasonable or unsupported by the student's individual circumstances. For example, professional judgment may not be used to change FSEOG selection criteria.

Types of Professional Judgment

The FAFSA Simplification Act distinguishes between two primary categories of professional judgment:

Special Circumstances

Special circumstances are financial situations that may justify adjustments to:

- Components of a student's Cost of Attendance (COA);
- Data used to determine a student's Pell Grant eligibility; or
- Data used to calculate the Student Aid Index (SAI).

Unusual Circumstances

Unusual circumstances are conditions that may justify an adjustment to a student's dependency status. This is commonly referred to as a **dependency override**.

A student may have both special and unusual circumstances. OBC may consider each circumstance separately and make appropriate adjustments based on the student's individual situation and supporting documentation.

General Professional Judgment Request Process

Students requesting professional judgment must submit a request to the Financial Aid Office at their respective campus.

To request consideration, the student must:

1. Submit a FAFSA for the applicable award year, when required for the type of request;
2. Complete OBC's Professional Judgment Request Form;
3. Provide a written explanation describing the circumstances supporting the request; and
4. Provide sufficient supporting documentation to substantiate the circumstances.

Supporting documentation will be evaluated based on the nature of the student's circumstances. OBC may request additional documentation when necessary to make an informed determination.

A request for professional judgment does not guarantee approval or additional financial aid.

Professional judgment requests are generally reviewed within **7–10 business days after OBC receives all required information and documentation**. Some requests may require additional review or documentation and may take longer.

If a student is selected for verification and requests a professional judgment adjustment involving information that must be verified, OBC will complete verification before exercising the professional judgment adjustment, except as otherwise permitted under federal guidance. OBC must also resolve any conflicting or inconsistent information before making an adjustment.

Notification and Finality of Decisions

The Financial Aid Administrator will notify the student of the outcome of the professional judgment request through the student's designated OBC communication method, which may include email or an official written notice.

OBC will document the basis for approving or denying a professional judgment request.

Professional judgment decisions made by an authorized Financial Aid Administrator are final and may not be appealed to the U.S. Department of Education.

Special Circumstances

An FAA may exercise professional judgment on a case-by-case basis to adjust eligible COA components or the specific data elements used to determine Pell Grant eligibility or calculate a student's SAI.

Examples of circumstances that may be considered include, but are not limited to:

- A change in employment status, income, or assets;
- A significant reduction or loss of income;
- A change in housing status, including homelessness;
- Elementary or secondary school tuition expenses;
- Additional family members enrolled in college;
- Medical, dental, or nursing home expenses not covered by insurance;
- Child or dependent care expenses;
- Severe disability of the student or another member of the student's household;
- Nonrecurring income that is not expected to continue; and
- Other changes that materially affect the student's cost of attendance or ability to pay for college.

These examples are not exhaustive. OBC may consider other documented circumstances that materially differentiate the student's situation from that of other students.

Limitations on Special Circumstances

OBC may not:

- Modify the federal formula or the tables used in the SAI calculation;
- Adjust data solely because the FAA believes the federal formula or tables are inadequate or inappropriate;
- Make adjustments based on circumstances that are not specific to the individual student or family;
- Use professional judgment to waive general Title IV eligibility requirements;
- Use professional judgment to circumvent federal laws or regulations; or
- Make unreasonable adjustments for ordinary or recurring living expenses already contemplated by the federal need analysis methodology.

When adjusting a data element that affects a student's SAI, OBC will use the resulting SAI consistently when determining eligibility for applicable Title IV programs.

Documentation for Special Circumstances

Documentation must be sufficient to substantiate the student's claimed circumstances and the resulting adjustment.

Depending on the circumstance, acceptable documentation may include:

Loss or Reduction of Income

- Letter from an employer;
- Documentation of termination, layoff, or reduction in hours;
- Proof of unemployment benefits;
- Dates of unemployment;
- Most recent pay stubs;
- Prior-year federal income tax information and W-2 forms; and
- Other documentation demonstrating the current or projected reduction in income.

Medical or Dental Expenses

- Documentation of qualifying medical, dental, or nursing home expenses;
- Insurance statements or explanations of benefits;
- Evidence of out-of-pocket expenses; and
- Documentation demonstrating expenses are not covered by insurance.

Nonrecurring Income

Examples may include:

- Inheritance;
- Severance payments;
- IRA or pension distributions;
- Capital gains; or
- Other documented nonrecurring income.

OBC may request documentation showing that the income was nonrecurring and is not expected to continue.

Loss of Benefits

Documentation may include records relating to the loss of:

- Unemployment benefits;
- Disability benefits;
- Child support; or
- Other qualifying income or benefits.

The Financial Aid Office may conduct and document an interview with the student as part of the professional judgment review.

Unusual Circumstances and Dependency Overrides

An FAA may perform a dependency override on a case-by-case basis when unusual circumstances prevent a student from contacting a parent or when contact with a parent poses a risk to the student.

A dependency override may only change a student's status from **dependent to independent**.

Examples of unusual circumstances include, but are not limited to:

- Human trafficking;
- Legally granted refugee or asylum status;
- Parental abandonment or estrangement;
- Abusive or unsafe family environments;
- Student or parental incarceration; or
- Other documented circumstances that make contact with a parent inappropriate or unsafe.

A student may indicate on the FAFSA that unusual circumstances prevent the student from providing parental information. The student may then receive provisional independent status pending review by the Financial Aid Office. OBC will review the student's circumstances and determine the appropriate action after obtaining the necessary information and documentation.

Circumstances That Do Not, by Themselves, Justify a Dependency Override

The following circumstances, by themselves or in combination, do not justify a dependency override:

- Parents refuse to contribute to the student's education;
- Parents refuse to provide information for the FAFSA or verification;
- Parents do not claim the student as a dependent for federal income tax purposes; or
- The student demonstrates total self-sufficiency.

OBC will evaluate the totality of the student's circumstances and supporting documentation when making a determination.

Documentation for Unusual Circumstances

OBC must maintain documentation sufficient to support a dependency override.

Acceptable documentation may include, but is not limited to:

- A documented interview with the student;
- Court orders or official federal or state documentation;
- Documentation of incarceration;
- A documented phone call or written statement from a state, county, or tribal welfare agency;
- Documentation from an independent living caseworker;
- Documentation from an agency or program serving victims of abuse, neglect, assault, or violence;
- Documentation from an attorney, guardian ad litem, court-appointed special advocate, TRIO representative, or GEAR UP representative;
- A documented determination of independence made by an FAA at another institution in the same or a prior award year;
- Letters from knowledgeable third parties familiar with the student's circumstances;
- Documentation of the student's living arrangements, such as leases, rent receipts, utility bills, or health insurance documentation; or
- Court documents or other official records supporting the claimed circumstances.

OBC may request additional information when necessary to resolve conflicting information or substantiate the student's circumstances.

Subsequent-Year Dependency Overrides

When OBC has made a documented determination that a student is independent due to unusual circumstances, OBC will presume the student remains independent in subsequent award years at OBC unless:

- The student informs OBC that their circumstances have changed; or
- OBC receives conflicting information requiring resolution.

OBC may ask whether the student's circumstances have changed but will not maintain procedures that unnecessarily delay or hinder the student's financial aid solely for that purpose.

Dependent Students Without Parental Support

A dependent student whose parents refuse to provide parental information or financial support is not automatically eligible for a dependency override.

However, if properly documented, the student may be eligible to receive a **Direct Unsubsidized Loan at the applicable dependent undergraduate annual loan limit.**

OBC must document that:

- The student's parents refuse to complete the FAFSA; **or**
- The student's parents do not and will not provide financial support to the student, including the date the support ended.

If the student's parents refuse to provide a written statement, OBC may obtain documentation from a knowledgeable third party.

This provision does not, by itself, justify a dependency override.

Unaccompanied Homeless Youth and Students at Risk of Homelessness

When a student does not have an acceptable determination from an authorized entity, OBC will review the student's circumstances to determine whether the student qualifies as:

- An unaccompanied youth who is homeless; or
- An unaccompanied youth who is self-supporting and at risk of homelessness.

These determinations are made on a case-by-case basis.

For purposes of this policy:

- **Homeless** means lacking fixed, regular, and adequate housing.
- **At risk of homelessness** means the student's housing may cease to be fixed, regular, and adequate.
- **Self-supporting** means the student pays for their own living expenses, including fixed, regular, and adequate housing.
- **Unaccompanied** means the student is not living in the physical custody of a parent or guardian.

OBC will evaluate the student's circumstances without regard to the reasons the student is unaccompanied or homeless.

Relevant information may include documentation or statements from the student and knowledgeable third parties, including:

- Homeless shelters and service providers;
- School district homeless liaisons;
- State homeless education coordinators;
- Financial aid administrators at other institutions;
- TRIO or GEAR UP programs;
- College or high school counselors;
- Social workers;
- Medical or mental health professionals;
- Mentors; or
- Clergy.

OBC will use discretion when requesting documentation and will respect the student's privacy. Documentation such as police reports or Child Protective Services reports is not automatically required when sufficient information is otherwise available.

Once OBC makes a documented homeless youth determination, OBC will presume the student remains independent in subsequent award years unless the student's circumstances change or OBC has conflicting information requiring resolution.

Timing of Determinations of Independence

OBC will notify students of the process, required documentation, and reasonable timeframe for reviewing requests involving unusual circumstances.

OBC will make a determination of independence and provide the student with the outcome as soon as practicable after receiving the information and documentation necessary to complete the review.

OBC's institutional goal is to act on a completed request within **60 days of receiving all requested supporting documentation**. If the student does not provide requested documentation, OBC may be unable to complete the determination. The Financial Aid Office will communicate the outcome or any additional documentation needed to the student.

Professional Judgment During a Disaster, Emergency, or Economic Downturn

During a qualifying disaster, emergency, or economic downturn, OBC may exercise professional judgment in accordance with applicable federal authority.

When supported by appropriate documentation, an FAA may:

- Determine that income earned from work is zero when the applicant provides documentation of unemployment benefits or confirmation that an application for unemployment benefits has been submitted; and
- Make other appropriate adjustments to income earned from work based on the totality of the student's or family's circumstances.

As an institutional guideline, unemployment documentation should generally be dated within 90 days of submission. OBC may exercise discretion to accept older documentation when permitted and when there is no reason to believe conflicting information exists.

Refusing or Reducing Direct Loan Eligibility

An authorized Financial Aid Administrator may, on a case-by-case basis, refuse to originate a Direct Loan or may reduce the amount of a Direct Loan for which a student would otherwise be eligible.

Any decision to refuse or reduce a loan must:

- Be made on a case-by-case basis;
- Be documented;
- Include the reason for the decision;
- Be communicated to the student in writing; and
- Not be based on discrimination prohibited by applicable law.

Conflicting and Inconsistent Information

OBC must resolve conflicting or inconsistent information relating to a student's eligibility before:

- Making a professional judgment adjustment, when applicable; and
- Disbursing affected Title IV funds.

If conflicting information is discovered after Title IV funds have been disbursed, OBC will investigate and resolve the discrepancy and take any required corrective action. All resolutions must be documented in the student's financial aid record.

Verification and Professional Judgment

If a student is selected for verification, OBC will complete verification before exercising professional judgment to adjust applicable information, except where federal guidance permits otherwise.

A professional judgment adjustment does not, by itself, require verification of an application that was not selected for verification.

When a PJ adjustment requires correction or adjustment of FAFSA information, OBC will process the adjustment through the appropriate federal system and ensure the appropriate FAA Adjustment/Professional Judgment indicator is used when required.

Subsequent ISIRs and Conflicting Information

OBC will review subsequent ISIR transactions in accordance with applicable federal requirements and institutional procedures.

If a subsequent transaction contains information that may affect the student's eligibility, including relevant changes to the SAI, comment codes, eligibility flags, verification information, or NSLDS information, OBC will determine whether additional review or action is required.

OBC will resolve any relevant conflicting information and document the resolution.

Discrepant Tax Information

Financial Aid Administrators are not expected to serve as tax professionals. However, OBC staff responsible for administering Title IV aid must have sufficient knowledge of relevant tax issues to identify potentially conflicting or questionable information that may affect student eligibility.

When necessary, OBC will investigate discrepancies involving tax filing requirements, filing status, income, or other relevant information and obtain appropriate documentation before determining or disbursing affected aid.

Documentation and Record Retention

OBC will maintain documentation supporting:

- The student's request;
- The circumstances presented;
- Documentation reviewed;
- Any conflicting information identified and its resolution;
- The basis for approving or denying the request;
- The adjustment made, if applicable;
- Any FAFSA or ISIR corrections or professional judgment processing performed; and
- Communication of the final determination to the student.

Documentation relating to unusual circumstances and dependency overrides will be retained in accordance with applicable federal record-retention requirements.

Policy Administration and Review

This policy is administered by the Ohio Business College Financial Aid Office under the oversight of the Regional Financial Aid Director.

All professional judgment decisions must be made by authorized financial aid personnel with the appropriate knowledge and authority to administer Title IV programs.

This policy will be reviewed annually and revised as necessary to reflect changes in federal law, regulations, Federal Student Aid guidance, or institutional procedures.

RETURN TO TITLE IV (R2T4) POLICIES AND PROCEDURES

Purpose

Ohio Business College (OBC) administers federal student financial aid in accordance with the Higher Education Act, federal regulations, and guidance published by the U.S. Department of Education.

This policy establishes OBC's procedures for determining the amount of Title IV federal student aid a student has earned when the student completely withdraws from an academic payment period or period of enrollment.

Federal student aid is awarded with the assumption that a student will attend for the entire payment period or period of enrollment. When a student completely withdraws before completing the period, OBC must determine the amount of Title IV aid the student earned and return any unearned funds as required by federal regulations.

The federal R2T4 calculation is separate from OBC's institutional refund policy. A student's institutional charges and refund may be determined under OBC's published refund policy even when the federal R2T4 calculation produces a different result.

Scope

This policy applies to students who:

- Receive or are scheduled to receive Title IV federal student aid;
- Begin attendance in the payment period or period of enrollment; and
- Completely withdraw from the payment period or period of enrollment.

A reduction in enrollment that does not constitute a complete withdrawal generally does not require an R2T4 calculation.

This policy applies to OBC as an **institution required to take attendance** for Title IV purposes.

Institutional Refund Policy

OBC students are charged tuition and fees on a quarterly basis during which they attend classes. This refund policy is intended for those students who withdraw from all classes at the college. For those who withdraw (drop) an individual course but remain in other courses, their financial aid may need to be reevaluated to determine a possible refund. If this is the case, see the Financial Aid Office. Ohio Business College uses the Council on Occupational Education's refund policy.

Refunds are to be made within 45 days after the school has determined that a student has withdrawn or been notified of the student's cancellation. All refunds are calculated based on tuition and fees. The refund policy for students attending Ohio Business College who incur a financial obligation for a period of 12 months or less is as follows:

- All prospective students are required to attend a personal interview prior to enrollment in to the program.
- Students who have not visited the school facility prior to enrollment have the opportunity to withdraw without penalty within three days following either attendance at a regularly-scheduled orientation or following a tour of the facilities and inspection of the equipment.
- During the add/drop period (receiving a grade of WD) of financial obligation, the institution refunds 100% of the tuition.
- During the first 10% of the period of financial obligation, the institution refunds at least 90% of the tuition;
- After the first 10% of the period of financial obligation and until the end of the first 25% of the period of obligation, the institution refunds at least 50% of the tuition;
- After the first 25% of the period of financial obligation and until the end of the first 50% of the period of obligation, the institution refunds at least 25% of the tuition; and
- After the first 50% of the period of financial obligation, the institution may retain all of the tuition.

A student withdrawing from school during the first week of classes may return unmarked textbooks that were purchased from Ohio Business College to the Student Accounts Office to receive a refund credit on their account. For a full refund, books must be returned within the first 14 days of the quarter.

A student is responsible for returns through either the College's Bookstore website or with assistance through the Student Accounts Office. **Please note:** lab and supply fees are charged in addition to the tuition and are refunded on a pro-rated basis. If a student withdraws from school, the amount of monies disbursed for non-institutional educational expenses will be based on the expenses incurred by the student up to the time of withdrawal, based on established budgets. No overpayment will result after half of the payment period has been completed. *Should OBC cancel a course offering, students will automatically receive a 100% refund of any tuition and fees paid for that course.

OBC as an Attendance-Taking Institution

OBC requires attendance to be taken and maintains attendance records for students throughout the applicable payment period.

Because OBC is required to take attendance, the student's withdrawal date for R2T4 purposes is **always the student's last date of attendance at an academically related activity, as determined by OBC from its attendance records.**

The withdrawal date is not based solely on:

- The date the student completes an institutional withdrawal form;
- The date the student is administratively withdrawn;
- The date OBC processes the withdrawal in its student information system; or
- A date provided solely by the student without supporting institutional attendance documentation.

The withdrawal date must accurately reflect the student's last documented academic attendance.

Definitions

Last Date of Attendance (LDA)

The **Last Date of Attendance** is the student's last date of attendance at an academically related activity, as documented by OBC's attendance records.

For an attendance-taking institution, the LDA is the withdrawal date used for the R2T4 calculation.

Date of Determination (DOD)

The **Date of Determination** is the date OBC determines that the student has withdrawn.

For an institution required to take attendance, OBC's determination must generally be made **no later than 14 calendar days after the student's LDA**, unless an unusual circumstance applies.

OBC may establish an institutional procedure requiring determination sooner than 14 days.

Payment Period

For OBC's standard-term programs, R2T4 calculations are performed on a payment-period basis when required by federal regulations.

Unearned Aid

The portion of Title IV aid that exceeds the amount the student earned based on the percentage of the payment period completed.

Earned Aid

The percentage of Title IV aid that corresponds to the percentage of the payment period completed.

Official Withdrawals

An official withdrawal occurs when a student provides notification to OBC that the student intends to cease attending the institution or follows OBC's established withdrawal process.

Because OBC is required to take attendance, the student's R2T4 withdrawal date will be the **LDA documented in OBC's attendance records**, even when the student begins the official withdrawal process on a different date.

OBC will document the student's withdrawal notification and attendance records in the student's file.

Administrative Withdrawals

OBC may administratively withdraw a student for reasons including, but not limited to:

- Excessive absences;
- Failure to meet institutional attendance requirements;
- Failure to satisfy academic requirements;
- Disciplinary action;
- Failure to meet financial obligations when permitted under institutional policy; or
- Other institutional reasons.

For R2T4 purposes, the withdrawal date for an attendance-taking institution remains the student's **last date of attendance at an academically related activity**, as documented by OBC's attendance records.

OBC will not establish an artificial withdrawal date that does not accurately reflect the student's actual last date of academic attendance.

Unofficial Withdrawals

An unofficial withdrawal occurs when a student ceases attendance without providing official notification to OBC.

Because OBC is required to take attendance, OBC will monitor attendance records to identify students who have ceased attending.

When OBC determines that a student has withdrawn, the LDA documented in the attendance records will be used as the withdrawal date for R2T4 purposes.

OBC will make its determination of withdrawal no later than **14 days after the student's LDA**, except in unusual circumstances recognized under federal regulations.

Date of Determination

OBC will have procedures in place to routinely monitor attendance records.

For students who withdraw, OBC will determine the student's withdrawal status **no later than 14 calendar days after the student's LDA**, unless a shorter institutional timeframe applies.

The 14-day timeframe includes:

- Weekends;
- Holidays; and

- Scheduled breaks.

OBC's internal procedures may require staff to identify and process withdrawals sooner than the federal maximum timeframe.

Once the Date of Determination is established, the applicable R2T4 deadlines begin.

The R2T4 calculation must generally be completed within **30 days of the Date of Determination**, and any required return of unearned Title IV funds must generally be completed within **45 days of the Date of Determination**.

Students Who Complete More Than 60% of the Payment Period

A student who withdraws after completing **more than 60% of the applicable payment period** is considered to have earned 100% of the Title IV aid included in the R2T4 calculation.

No return of Title IV funds is required based solely on the R2T4 calculation when the student has earned 100% of the applicable Title IV aid.

OBC will still complete any other required financial aid, enrollment, or account adjustments.

Calculating the Percentage of Title IV Aid Earned

The percentage of Title IV aid earned is determined by dividing the number of calendar days the student completed by the total number of calendar days in the applicable payment period or period of enrollment.

The withdrawal date used in the calculation is the student's LDA.

The result represents the percentage of Title IV aid earned.

Formula

Calendar Days Completed ÷ Total Calendar Days in Payment Period = Percentage Completed

If the student withdraws before completing more than 60% of the period:

Percentage Completed = Percentage of Title IV Aid Earned

If the student withdraws after completing more than 60%:

Percentage of Title IV Aid Earned = 100%

Scheduled breaks that meet federal requirements are excluded from the calculation.

Title IV Aid Included in the R2T4 Calculation

The R2T4 calculation considers Title IV aid that was:

- Disbursed; or
- Could have been disbursed as of the student's withdrawal date, as determined under applicable federal regulations.

Applicable Title IV programs may include:

- Federal Pell Grant;
- Federal Supplemental Educational Opportunity Grant (FSEOG);
- Direct Subsidized Loan;
- Direct Unsubsidized Loan;
- Direct PLUS Loan; and
- Other Title IV programs when applicable.

OBC will determine whether aid was eligible to be included as aid that could have been disbursed based on the student's eligibility and federal disbursement requirements.

Institutional Charges Used in the R2T4 Calculation

Institutional charges are used to determine the amount of unearned Title IV aid that OBC may be required to return.

Applicable institutional charges may include:

- Tuition;
- Required institutional fees;
- Required books, supplies, materials, and equipment when applicable under federal rules; and
- Other charges that meet the federal definition of institutional charges.

Institutional charges do not determine the amount of Title IV aid the student earned.

Amount of Unearned Title IV Aid

The amount of Title IV aid that must be returned is determined by comparing:

1. The amount of Title IV aid that is unearned; and
2. The amount of unearned institutional charges, when applicable.

The amount OBC must return is the lesser of the applicable amounts under the federal R2T4 calculation.

The student may also have a responsibility for an applicable Title IV grant overpayment or other amount resulting from the calculation.

Order of Return of Title IV Funds

When OBC is required to return unearned Title IV funds, returns will be made in accordance with the federally prescribed order of return applicable to the student's aid.

OBC will return funds to the appropriate Title IV programs in the required order and amount, subject to federal limitations. In this order:

1. Loans. Unearned funds returned by the institution, or the student must be credited to outstanding balances on title IV loans made to the student or on behalf of the student for the payment period for which a return of funds is required. Those funds must be credited to outstanding balances for the payment period for which a return of funds is required in the following order:
 - Federal Direct Unsubsidized Loan
 - Federal Direct Subsidized Loan
 - Federal Direct PLUS Loan received on behalf of the student
2. Federal Pell Grant
3. Iraq and Afghanistan Service Grants.
4. Federal SEOG Aid
5. Any other Title IV Program
6. Other Federal, State, Private, or Institutional Student Financial Assistance to the Student.

The Financial Aid Office will document all returns in the student's financial aid record and institutional systems.

OBC's Return of Funds

OBC will return the amount of unearned Title IV funds for which the institution is responsible no later than **45 days after the Date of Determination**.

OBC will not delay a required federal return because of an outstanding balance owed by the student.

Returns will be processed through the appropriate federal systems and institutional accounting procedures.

Student Responsibility for Grant Overpayments

An R2T4 calculation may result in a student grant overpayment.

The student's responsibility will be determined in accordance with applicable federal grant overpayment rules.

Federal regulations provide limitations on the amount of a grant overpayment that a student must return, including applicable protection for small amounts and the statutory limitation on the student's responsibility.

OBC will provide required notifications to students regarding any grant overpayment for which the student is responsible.

OBC Institutional Practice

When permitted by institutional policy, OBC may elect to return a student's remaining grant overpayment on the student's behalf.

Any such payment is an **OBC institutional practice and is not a federal requirement**.

The Financial Aid Office and Accounting Office will document any institutional payment made on behalf of the student.

Post-Withdrawal Disbursements

If a student has earned Title IV funds that were not disbursed before the student's withdrawal, the student may be eligible for a **post-withdrawal disbursement (PWD)**.

OBC will determine whether the student is eligible for a PWD as part of the R2T4 process.

Grant Post-Withdrawal Disbursements

Eligible grant funds may be disbursed as a PWD in accordance with federal requirements.

OBC will apply applicable federal deadlines for:

- Crediting allowable institutional charges;
- Directly disbursing remaining funds to the student; and
- Obtaining required authorization when applicable.

Loan Post-Withdrawal Disbursements

A Direct Loan PWD may only be made when the student meets the applicable federal eligibility requirements.

OBC must obtain the required confirmation from the student or parent, as applicable, before disbursing loan funds that require confirmation.

OBC will provide the required notification and allow the student or parent the applicable 14-day response period.

A loan PWD that is accepted will be processed within the applicable federal timeframe.

Existing Title IV Credit Balance

If a student has a Title IV credit balance at the time of withdrawal, OBC will complete the R2T4 calculation before releasing the credit balance when required.

If the R2T4 calculation results in a return of Title IV funds, OBC will apply the credit balance as required by federal regulations before releasing any remaining balance to the student.

Any remaining Title IV credit balance will be released to the student within the applicable federal timeframe.

OBC will not use a Title IV credit balance to satisfy charges that are not allowable under federal regulations.

Credit Balance Created by the R2T4 Calculation

If the R2T4 calculation creates a Title IV credit balance, OBC will process the credit balance in accordance with federal requirements.

The Financial Aid Office will coordinate with Student Accounts/Accounting to ensure:

- Required Title IV returns are completed;
- Applicable student grant overpayments are addressed;
- The remaining credit balance is accurately calculated; and
- The student receives the remaining credit balance within the required timeframe.

Student Fails to Complete the Payment Period

OBC will maintain procedures to determine whether a student who receives all failing grades actually completed the payment period or withdrew.

If a student earns a passing grade in one or more courses that span the entire payment period, OBC may presume the student completed the period unless other information establishes that the student withdrew.

When necessary, OBC will review attendance records and other appropriate documentation to determine whether an R2T4 calculation is required.

Student Does Not Begin Attendance

A student who does not begin attendance in the courses for which the student was scheduled may not establish eligibility for Title IV funds for those courses.

OBC will review attendance records and take appropriate action when a student fails to establish attendance.

Any Title IV funds received for which the student did not establish eligibility will be handled in accordance with federal requirements.

Documentation Requirements

OBC will maintain documentation supporting:

- The student's withdrawal notification, when applicable;
- Attendance records;
- Last Date of Attendance;
- Date of Determination;
- R2T4 calculation;
- Title IV aid included in the calculation;
- Institutional charges used;
- Amount of earned and unearned aid;
- Amount OBC is required to return;
- Amount returned to each Title IV program;
- Any student grant overpayment;
- Any post-withdrawal disbursement;

- Student/parent authorization when required;
- Required notifications;
- Credit-balance calculations; and
- Any institutional payment made on behalf of a student.

A student's self-certification of attendance is not sufficient by itself when OBC's institutional records are required to establish the withdrawal date. OBC is responsible for determining and documenting the withdrawal date.

Federal R2T4 Timeframes

OBC will comply with the following federal timeframes:

Requirement	Federal Timeframe
Determine withdrawal status at attendance-taking institution	Generally no later than 14 days after LDA
Complete R2T4 calculation	Within 30 days of Date of Determination
Return institutionally owed Title IV funds	Within 45 days of Date of Determination
Offer applicable loan PWD	Within 30 days of Date of Determination
Disburse accepted loan PWD	Within 14 days of PWD Acceptance
Release applicable remaining Title IV credit balance	Within 14 days of credit being generated on student ledger

The Financial Aid Office may establish **shorter internal processing deadlines** to ensure OBC consistently meets federal deadlines.

OBC Internal Processing Standard

To support timely compliance, OBC will make reasonable efforts to:

1. Identify students who have ceased attendance promptly;
2. Confirm the student's LDA from official attendance records;
3. Establish the Date of Determination;
4. Complete the R2T4 calculation;
5. Process required Title IV returns;
6. Process applicable post-withdrawal disbursements;
7. Notify the student of resulting financial aid changes; and
8. Resolve resulting student account balances.

OBC may establish internal processing targets that are shorter than the federal maximum deadlines.

Institutional Refunds and R2T4 Are Separate

A student's institutional refund, tuition obligation, or remaining account balance is not the same as the student's Title IV R2T4 obligation.

The following calculations are separate:

Institutional Refund Calculation

Determines the amount of tuition and other institutional charges that may be refunded under OBC's institutional policy.

Federal R2T4 Calculation

Determines the amount of Title IV aid the student earned and the amount of unearned aid that must be returned.

A student may therefore have:

- An institutional refund;
- A Title IV return;
- A remaining institutional balance;
- A Title IV credit balance; or
- More than one of these at the same time.

Policy Administration

The Regional Financial Aid Director is responsible for oversight of this policy.

Financial Aid personnel involved in R2T4 processing must receive appropriate training and must follow current federal regulations, the FSA Handbook, applicable Department of Education guidance, and OBC's institutional procedures.

This policy will be reviewed at least annually and revised when necessary to reflect changes in:

- Federal law;
- Federal regulations;
- FSA Handbook requirements;
- Department of Education guidance;
- OBC academic programs;
- OBC attendance procedures; or
- OBC institutional refund policies.

Effective Date: July 1, 2026

