



“To offer quality professional trainings in healthcare, it & business related disciplines”

Federal Cash Management and Drawdown Policy

Purpose

To ensure proper stewardship of federal student aid funds and compliance with cash management regulations, CTK Healthcare & Career Institute limits requests for Title IV funds to only what is **immediately needed** for disbursement to eligible students.

a. Just-in-Time Drawdown Method

CTK operates on a "just-in-time" funding model:

- **Title IV funds are requested from the U.S. Department of Education’s G5 system only when:**
 - **Student eligibility has been confirmed,**
 - **Classes are in session,**
 - **Disbursement dates are within a 3-day window.**
 - **This ensures federal funds are disbursed within three business days of receipt, as required.**
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b. Disbursement-Driven Requests

Drawdown requests are:

- **Based on actual disbursement rosters prepared by the Financial Aid Office.**
 - **Reviewed and approved by the Business Office to verify that amounts requested align with anticipated disbursements.**
 - **Recorded in both the general ledger and student ledger accounts for reconciliation.**
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c. Separation of Duties

- The Financial Aid Office certifies student eligibility and determines aid amounts.
 - The Business Office is responsible for G5 drawdowns and fund disbursement.
 - This separation helps prevent over-requesting and ensures regulatory compliance.
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d. Monitoring and Reconciliation

- The institution performs monthly reconciliations of:
 - G5 cash requests,
 - Actual student disbursements,
 - General ledger and COD data.
 - Any excess funds drawn down in error are promptly returned to G5 within 3 days.
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e. Training and Oversight

- Staff responsible for G5 drawdowns and fund disbursement receive annual training in Title IV cash management rules.
 - Internal audits are conducted quarterly to ensure proper procedures are followed.
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f. Recordkeeping

- Documentation of each drawdown request includes:
 - Date and amount requested,
 - Disbursement schedule,
 - Supporting student-level data.
- All records are retained for at least 3 years per 34 CFR § 668.24.