

Title: #VI-10C. Withdrawal and Return of Title IV Financial Aid

Date: May 15, 2024 (replaces policy dated January 18, 2024)

A. Statutory Guidance

Federal regulations, HEA Sec. 484(c), <u>34 CFR 668.164</u> and <u>34 CFR 668.22</u> explain how Title IV funds are handled when a recipient of those funds ceases to be enrolled (100% withdrawal) prior to the end of a payment period or period of enrollment. These requirements do not apply to a student who does not actually begin attendance or a student with a change in enrollment status. An example of a change in enrollment status is when a student reduces their course load from 12 credit hours to 9 credit hours within the payment period.

B. Definitions

- 1. Return Calculation A calculation required by Title IV where WVUP determines the amount of financial aid earned by a student who officially or unofficially withdraws or takes a leave of absence prior to completing 60% of the term for which they are enrolled.
- 2. Official Withdrawal A student provides notification to the college of their intention to withdraw from some or all of their classes and either completes the Withdrawal Form or logs into the On-Line Student Information System (OLSIS) and withdraws.
- Unofficial Withdrawal An unofficial withdrawal occurs when a student stops attending class or completing assignments but does not officially notify the college that they have stopped attending classes.
- **4. Date of Determination –** The date that the Financial Aid Office is made aware that the student is officially or unofficially withdrawing from school.
- 5. Last Date of Attendance The date that the student last attended and was academically engaged in a course.
- **6. Payment Period** For WVU Parkersburg, one payment period is equal to one semester. WVUP has a standard academic calendar with standard term lengths, and Title IV financial aid is only provided to students in approved programs offered in a credit-hour format.

C. General Provision

The Higher Education Act, specifically <u>34 CFR 668.22</u>, specifies how schools must determine the amount of Title IV program assistance that a student has earned once the student has withdrawn from school. WVU Parkersburg (WVUP) participates in the following Title IV programs that are subject to Return of Title IV regulations:

Federal Pell Grant
Federal Supplemental Educational Opportunity Grants (FSEOGs)
Federal Direct Loans (Subsidized, Unsubsidized, and PLUS)

These provisions also apply to all programs funded by the state of West Virginia, including but not limited to the programs listed below. For these programs, unearned funds are returned to the state of West Virginia.

WV Invests Grant

WV Higher Education Grant
PROMISE Scholarship
Higher Education Assistance for Part-time Students (HEAPS) Grant

Funds will be returned to the programs based on a concept of earned versus unearned aid. The Return of Title IV funds rule assumes that a student earns his or her aid based on the period of time he or she remained enrolled and academically engaged in the course(s). If a student officially or unofficially withdraws from 100% of the classes in which they are enrolled, the WVUP Financial Aid Office is required by federal regulations to determine how much financial aid was earned by the student. WVUP must complete this calculation for all students who are dismissed, withdraw, drop out, or take a leave of absence prior to completing 60% of a payment period or term. For a student who completely withdraws after the 60% point-in-time, all funds are considered to be earned and no amount will need to be returned. However, WVUP must still complete a Return Calculation form (R2T4) in order to determine whether the student is eligible for post-withdrawal disbursement. (34 CFR 668.164(j)(3)(i))

Unearned Title IV funds must be returned. Unearned aid is the amount of aid disbursed to the student that exceeds the amount of Title IV aid earned. During the first 60% of the enrollment period, a student earns Title IV funds in direct proportion to the length of time they remain enrolled in at least one credit hour. A student who remains enrolled beyond the 60% point earns all aid for that period. The Return Calculation is based on the percentage of earned aid using the following Federal Return of Title IV funds formula:

Percentage of payment period or term completed = the number of days completed up to the withdrawal date divided by the total days in the payment period or term. (Any break of five days or more is not counted as part of the term.) This percentage is also the percentage of earned aid.

Unearned funds returned by the institution or the student must be returned in a specific order, pursuant to 34 CFR 668.22(i):

- 1. Unsubsidized Federal Direct Stafford loans.
- 2. Subsidized Federal Direct Stafford loans.
- 3. Federal Direct PLUS received on behalf of the student.

If unearned funds still remain to be returned, then the remaining excess must be returned in the following order:

- 1. Federal Pell Grants.
- 2. Iraq and Afghanistan Service Grants.
- FSEOG Grants.

Return of Unearned Aid - Institutional responsibility vs student responsibility

The institution must return the lesser of:

- a. The total amount of unearned Title IV aid to be returned
- b. An amount equal to the institutional charges incurred by the student for the payment period, multiplied by the percentage of Title IV grant or loan assistance that has not been earned by the student.

After the institution has allocated the unearned funds for which it is responsible for returning, the student must then return any Title IV aid for which they are responsible. The amount the student is responsible for returning is calculated by subtracting the amount of unearned aid that the institution is required to return from the total amount of unearned Title IV financial aid to be returned.

Official Withdrawals

In order to complete an official withdrawal from school, a student must complete a <u>Withdrawal Form</u> and submit it online to the WVUP Center for Student Services. The date that the student initiates the withdrawal form then becomes the Date of Determination for the Return Calculation in the student's official withdrawal process in most cases. As part of the withdrawal process, faculty are required to enter an official Last Date of Attendance for the student into our student information system (SIS) for each class that the student is withdrawing from. The student's latest Last Date Of Attendance becomes the student's withdrawal date.

Unofficial Withdrawals

If a student does not complete the Withdrawal Form or notify the Center for Student Services, but stops attending and engaging in all of their courses, the date of determination that the student unofficially withdrew is the date that WVUP becomes aware that the student ceased attendance. Even when a student unofficially withdraws, we confirm a Last Date of Attendance by requiring that faculty confirm the actual Last Date of Attendance in our SIS for any grade of 'W', 'F', or 'FIW.' In order to ensure that we are monitoring for all unofficial withdrawals, including those that may go unreported, at the end of each semester the Financial Aid Office runs a "Zero GPA" report. This report lists every student who earned a grade point average of 0.00 for the semester. Each of those students is reviewed to ensure that a Return Calculation is completed if necessary. For Return Calculations that are completed for the students on the "Zero GPA" report, the Date of Determination is the date that grades were posted to the students' records for the term.

The responsibility to repay unearned aid is shared by WVUP and the student. WVUP's share is the lesser of the total amount of unearned aid or the institutional charges multiplied by the percentage of aid that was unearned. The student's share is the difference between the total unearned amount and WVUP's share.

Pursuant to 34 CFR 668.22(j)(1), WVUP must return the amount of Title IV funds for which it is responsible as soon as possible, but no later than 45 days after the date of determination of the student's withdrawal. Funds are returned to the appropriate federal program based on the percentage of unearned aid using the following formula:

Aid to be returned = (100% of the aid that could be disbursed minus the percentage of earned aid) multiplied by the total amount of aid that could have been disbursed during the payment period or term.

Post-withdrawal disbursements

A student who earned more aid than was disbursed prior to withdrawal is owed a post-withdrawal disbursement. Post-withdrawal disbursements must be made from available grant funds before available loan funds. WVUP will make the disbursement as soon as possible, but no later than 45 days after the date of the institution's determination that the student withdrew (see "Date of Determination"). WVUP will credit post-withdrawal disbursements toward unpaid institutional charges first.

Any portion of a post-withdrawal disbursement for a payment period that remains after the student's account has a zero balance for that payment period will be offered to the student (or parent in the case of a PLUS loan) as a credit balance refund. (34 CFR 668.22(a)(6)) As with other credit balance refunds, the credit balance will be disbursed to the student as soon as possible, but no later than 14 days after the Return Calculation is completed.

In the case of a post-withdrawal credit balance, grant funds will be automatically disbursed to the student, but loan funds that make up a post-withdrawal disbursement will only be disbursed after obtaining confirmation from the student (or parent in the case of a PLUS loan) that they still wish to have their loan funds disbursed. The WVUP Financial Aid office will notify the student (and parent in the case of a PLUS loan) that a post-withdrawal loan is available within 30 calendar days of the Date of Determination that the

student withdrew. The student (or parent for PLUS) will have 14 calendar days from the date of that notification to respond and either accept or decline the post-withdrawal loan disbursement.

WVUP's tuition and fee refund policy differs from the Return of Title IV Funds Policy. Please click to view: Answer Book policy #VI-11E. Refunds of Tuition and Fees.

Responsible Administrator: Director, Financial Aid, 304-424-8310

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