

WESTERN NEBRASKA COMMUNITY COLLEGE

Administrative Procedure

TITLE:	Financial Aid – Return of Title IV
DIVISION:	Student Services
CATEGORY:	Financial Aid
REFERENCE:	BP-502 (Federal Title IV Funds Policy) Higher Education Act (HEA), Section 484B 34 CFR 668.22 Treatment of Title IV Funds When a Student Withdraws Federal Student Aid Handbook - Vol. 5 Withdrawals and the Return of Title IV Funds
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APPROVAL:	John Marrin, Interim President

Purpose

This procedure complies with Federal Student Aid Title IV requirement that schools perform a Return of Title IV calculation for Title IV eligible students who do not successfully complete the entire enrollment period due to withdrawal (official or unofficial).

Scope

This procedure applies to all WNCC students who receive Federal Title IV funding.

Definitions

X-dropping a Course: When a student withdraws from his/her course during the no-penalty add/drop period provided at the beginning of each term. If the student notifies the Student Services Office in writing to “drop” the course during the no-penalty drop period, it is classified as an “x-drop.” If a student x-drops a course, the course will not be included on their transcript. Students who are reported by faculty as never attending during the 10-day period at the beginning of the semester are x-dropped from the course by the Registrar.

Withdrawing from a Course: When the student submits a drop slip to Student Services after the no-penalty add/drop period but prior to the published withdrawal date for the term, it is known as a “withdrawal” or withdrawing from the course. Withdrawing from a class results in a “W” appearing on the student's transcript. The “W” has no effect on the student's GPA (grade point average) but the Financial Aid Office MUST be notified when a student has withdrawn from all courses because that office staff may need to calculate a Return of Title IV. A student who stops attending without formally withdrawing from a course is considered an unofficial withdrawal and the non-attendance may also

trigger the requirement for Return of Title IV calculation. An unofficial withdrawal may result in a grade of “F” and will affect the student’s GPA.

Procedure

Process Overview and Applicability

Title IV funds are awarded to a student under the assumption that the student will attend courses for the entire enrollment period for which the assistance is awarded. Students who do attend and complete the entire enrollment period, are assumed to have ‘earned’ 100% of the Title IV funding disbursed. Schools are required to perform a Return of Title IV calculation for Title IV eligible students who do not complete the entire enrollment period due to withdrawal (official or unofficial). If the amount disbursed to the student is greater than the amount the student earned, the unearned funds must be returned by the College. The student may be required to repay a portion of the federal funds if the amount to be returned exceeds the amount to be returned by the College. Federal regulations allow the institution to charge a student for any portion of federal funds returned on the student’s behalf. If the amount disbursed to the student is less than the amount the student earned, and for which the student is otherwise eligible, the student is eligible to receive a post-withdrawal disbursement of the earned aid that was not received.

1. The Return of Title IV calculations are required when a student has failed, received a grade of “incomplete,” or withdrawn, officially or unofficially, from any Title IV-eligible enrolled course during a period of enrollment at the College. Students who fail to complete some Title-IV-eligible courses, but not all enrolled courses, may be included in the Return of Title IV calculations if the rules for modular courses apply. Title IV funds to be included in the calculation are as follows: Federal Pell Grant, Federal Supplemental Educational Opportunity Grant, Iraq and Afghanistan Service Grant, Federal Direct Loan (subsidized and unsubsidized), and Federal Direct PLUS loan. Note: Federal Work Study funds are not included in the calculation.
2. WNCC encourages instructional staff to take attendance as a general rule. Under some circumstances, attendance may be taken as required by:
 - An outside entity (i.e., accreditor, state) for a particular student or cohort of students; or
 - WNCC or an outside entity has a requirement that can only be met by taking attendance or a comparable process to demonstrate attendance in courses of that program or a portion of that program.
 - The College must have a process for determining whether a student has begun attendance.

As a general rule, WNCC first attempts to establish the last date of attendance based on academic engagement as determined by instructional staff for the Return of Title IV calculations. If that is not available, WNCC shall use the standard 50% of the term as the last date of attendance (LDA). In such cases, that date will be the last date of attendance for the Return of Title IV calculations. If the outside entity has a requirement for attendance for a sub-group of students, then that sub-group of students is bound by WNCC’s attendance guidelines.

All Return of Title IV notifications made to students or parents will be sent via USPS mail to the address on record.

Establishing a Withdrawal Date

When a student withdraws from a course or ceases to attend, they establish a withdrawal date at that time.

1. *Official Withdrawals:* The withdrawal date is the date the student completes the College withdrawal process. When all courses receive a 'W,' the withdrawal date is considered the date of initiation by the student or school as in the case of cancelled courses or student appeals.
2. *Unofficial Withdrawals:* The last date of attendance for an unofficial withdrawal is the documented date recorded by the College of the last date a student was academically engaged or, if no date is available, the midpoint of the student's term of enrollment.
3. A student is considered to have withdrawn from a payment period or period of enrollment if, within that same payment period or period of enrollment, the following occurs: a) for a program that is measured in credit hours, the student does not complete all the days the student was scheduled to complete; or b) for a non-term or nonstandard-term program, the student is not scheduled to begin another course for more than sixty (60) calendar days after the end of the module the student ceased attending.
4. A student who completes all the requirements for graduation from his or her program before completing the days or hours in the period scheduled to complete is exempt from the Return of Title IV requirements and is not considered a withdrawal for Title IV purposes. This graduation exemption applies to all program types, including standard-term, nonstandard-term, nonterm, and subscription-based programs.
5. *Withdrawal Exemptions for Courses Offered in Modules:* If a student is enrolled in at least one module course, they are considered a module student and thus the following process must be followed to determine whether a student is considered a withdrawal exemption for Return of Title IV purposes. The College will be able to determine whether a student enrolled in a program offered in module(s) is a withdrawal by asking the following questions:
 - After beginning attendance in at least one course, did the student stop attending or fail to begin attendance in a scheduled course used to determine the student's eligibility for Title IV? If the answer is no, this is not a withdrawal. If the answer is yes, go to next question.
 - When the student stopped attending or failed to begin attendance in a scheduled course, was the student currently attending any other courses in the payment period or period of enrollment used to determine the student's eligibility for Title IV aid? If the answer is yes, this is not a withdrawal; however, other regulatory provisions concerning recalculation may apply. If the answer is no, go to next question.
 - Did the student complete all requirements for graduation? If the answer is yes, this is not a withdrawal; however, other regulatory provisions concerning recalculation may apply. If the answer is no, go to next question.
 - Did the student successfully complete Title IV-eligible coursework in one module or a combination of modules that equals 49% (calculation may not be rounded up) or more of the number of countable days in the payment period or period of enrollment? If the answer is yes, this is not a withdrawal; however, other regulatory provisions concerning recalculation may apply. If the answer is no, go to next question.

- Countable days for the numerator include only the days in modules in which the student successfully completed (with a passing grade) at least one course.
- Countable days for the denominator include all of the days in the period (typically the first day of class through the last day of final exams) minus any scheduled breaks of five or more consecutive days if they fall between modules and all days between modules in the period. Scheduled breaks of five or more consecutive days that fall within a module are included in the number of countable days. Days that are common to multiple modules are only counted once. Weekend days are included in countable days if the weekend occurs during a module; weekend days are not included in countable days if the weekend falls in between modules. Breaks that overlap other modules are included in countable days.
- Did the student successfully complete Title IV-eligible coursework equal to or greater than what the school considers to be half-time enrollment for the payment period or period of enrollment? If the answer is yes, this is not a withdrawal; however, other regulatory provisions concerning recalculation may apply. If the answer is no, go to next question.
- Did the student confirm attendance in writing for a Title IV-eligible course in a later module in the payment period or period of enrollment that begins no later than forty-five (45) calendar days after the end of the module he or she ceased attending? If the answer is yes, this is not a withdrawal, unless the student does not return. If the answer is no, a student is considered withdrawn, recalculation provisions may apply, and all normal Return of Title IV Funds requirements apply.

Written Confirmation of Future Attendance

1. A student is not considered to have withdrawn if the College obtains written confirmation from the student close to the date that the student actually ceased attendance and before the time the College was required to return Title IV funds, offer any post-withdrawal disbursement of loan funds, or take any other action under the Return of Title IV requirements, that the student will attend a module that begins later in the same payment period or period of enrollment, and that module begins no later than forty-five (45) calendar days after the end of the module the student ceased attending.
2. A student may also reaffirm their intent to attend by registering for a future course within the same payment period or period of enrollment at the time of the withdrawal.
3. The College may not wait to perform a Return of Title IV Funds calculation to see if the student who has withdrawn and has not provided written confirmation of future attendance will return later in the payment period or period of enrollment. The College is required to undo the Return of Title IV Funds calculation if a student who withdraws from a non-term credit hour program returns to the same program at the College within 180 calendar days. The student is treated as though they did not cease attendance. Similarly, if a student withdraws from a term-based credit-hour program offered in modules during a payment period or period of enrollment and reenters prior to the end of the period, the student is eligible to receive any Title IV program funds that they were otherwise eligible to receive prior to withdrawal.
4. If the student does not return for the future module after providing written confirmation of future attendance, a return calculation must be completed.

Time Frame for Determining a Withdrawal Date

1. *Official withdrawals:* The withdrawal date is determined within thirty (30) days of the date of withdrawal.
2. *Unofficial withdrawals:* The withdrawal date is determined within thirty (30) days of the end of the term.

Rescinding Withdrawal

- WNCC may allow a student to rescind their official notification to withdraw by filing a written statement that they will continue to participate in academically related activities and intends to complete the payment period or period of enrollment.
- If the student subsequently withdraws after rescinding an intent to withdraw, the withdrawal date is the date the student first provided information to the College or began the College's withdrawal process, unless a last date of attendance or academically related activity is documented.

Extenuating Circumstances

Students with extenuating circumstances may not be able to officially withdraw. For these students the College will use the date the College was notified that the student could no longer attend (i.e., death, hospitalization, incarceration, etc.).

Leaves of Absence

WNCC does not grant any leaves of absence.

Academic Attendance

Academic engagement may be used by faculty to establish the last date of academic attendance. This includes active participation by a student in an instructional activity related to the student's course of study that is defined by the College in accordance with any applicable requirements of its state or accrediting agency, such as:

- Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, whether there is an opportunity for interaction between the instructor and students,
- Submitting an academic assignment,
- Taking an assignment or an exam,
- Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction,
- Attending a study group, group project, or an online discussion that is assigned by the College, or
- Interacting with an instructor about academic matters.

The College is to exclude those activities where the student is not academically engaged such as:

- Living in College housing,
- Participating in the College's meal plan,
- Logging into an online course or tutorial without any further participation, or

- Participating in academic counseling or advisement.

For students enrolled in a distance education context, logging in is not sufficient, by itself, to demonstrate academic attendance by the student. The College must demonstrate that a student has participated.

Calculating Return of Title IV

The percentage (amount) of earned Title IV funds is calculated on a daily basis from the first day of classes. The process uses calendar days, including weekends. However, any break of five (5) days or more is not counted as part of the days in the term. The percentage of term completed equals the number of days completed divided by the total days in the term. The amount of Title IV funds earned is the percentage of the term completed multiplied by the total amount of Title IV funds disbursed or that could have been disbursed.

If a student was enrolled in modules and the coursework in the module(s) was used to determine the amount of the student's eligibility for Title IV funds for the payment period or period of enrollment, the College must determine the number of days the student was scheduled to complete in the period for the denominator of the Return of Title IV calculation. The College elected not to utilize a fixed point or "freeze date" for determining days in modules a student was scheduled to attend as allowed in the September 2, 2020 Federal Register. The College will include in the denominator the days in a course or a module if:

- For students eligible for a Federal Pell Grant, an Iraq and Afghanistan Service Grant (IASG), or a Teacher Education Assistance for College and Higher Education (TEACH) Grant, if the student attended at least one day in the course/module.
- For students eligible for a Direct Loan or Federal Supplemental Educational Opportunity Grant (FSEOG) funds during the period, if the student attended at least one day in the course/module or was enrolled or registered in the course/module for the period at any time on or after the first day of the period, even if the student did not attend the course/module.

After the sixty (60) percent point in the payment period or period of enrollment, a student has earned 100% of the Title IV funds they were scheduled to receive during the period. If a student withdraws, officially or unofficially, after the sixty (60) percent point-in-time, there are no unearned funds. The College must still determine whether the student is eligible for a post-withdrawal disbursement.

Post-withdrawal Disbursement

If the student did not receive all of the funds earned prior to withdrawing, a post-withdrawal disbursement may be due. The amount of the post-withdrawal disbursement is the difference between the amount of Title IV funds disbursed and the amount earned.

WNCC may not make a post-withdrawal disbursement of any of the following Title IV funds:

- Second or subsequent Direct Loan disbursements to a student who did not graduate or successfully complete the loan period.
- Direct Loan disbursement to a first-time, first year undergraduate who withdrew before completing the first thirty (30) days of their program, if the College is not exempt from the delayed delivery/disbursement requirement.
- Direct Loan disbursement to a borrower who has not signed the loan's promissory note.

- Disbursements of any Title IV funds to students for whom the College did not receive a valid Institutional Student Information Record (ISIR) or Student Aid Record (SAR) prior to the student withdrawing or by the annual deadline published by the U.S. Department of Education in the Federal register.
- Federal Pell Grant, FSEOG or Direct Loan disbursement for a subsequent payment period to a student who withdrew from a non-term credit hour program before completing the previous payment period for which the student has been paid.

Post-withdrawal Notification Requirements

- The College is permitted to credit a student's account with the post-withdrawal disbursement of Title IV grant funds without the student's permission. The College must notify a student, or parent for a Direct Parent PLUS Loan, in writing prior to making any post-withdrawal disbursement of loan funds.
- The notification must include the information necessary to make an informed decision on whether the student or parent would like to accept the disbursement.
- The notice must be sent within thirty (30) calendar days after the date that the College determines the student withdrew.
- The notice must permit the parent/student to determine which funds, if any, they wish to accept/decline.
- The College will set a deadline of fourteen (14) days or more and the notice must advise that if there is no response by the deadline established that the College is not required to make the post-withdrawal disbursement and funds will be returned to the Title IV programs.
- If the notification is received from the student/parent by the established deadline, the College must disburse loan funds within 180 days and grant funds within forty-five (45) days. If authorization is received after the established deadline, the College may choose to make a post-withdrawal disbursement based on an acceptance received after the College's deadline. If the College chooses not to make a post-withdrawal disbursement when the acceptance was received after the College's deadline, the College must notify the student or parent in writing that the disbursement will not be made and why.
- If a post-withdrawal disbursement creates a credit balance on the student's account, the balance will be provided to the student within fourteen (14) days.
- All official notifications are sent via USPS mail to the address on record.

Returning Unearned Funds

The College will return Title IV funds to the programs from which the student received aid during the period of enrollment as applicable, in the following order (as amended by applicable federal law), up to the net amount disbursed from each source:

- Unsubsidized Direct Loans (other than Direct PLUS Loans)
- Subsidized Direct Loans
- Direct PLUS Loans
- Federal Pell Grants for which return of Title IV funds is required

- Iraq and Afghanistan Service Grant, for which a return of Title IV funds is required
- Federal Supplemental Educational Opportunity Grant (FSEOG) for which return of Title IV funds is required
- TEACH Grants for which a return of Title IV funds is required
- Iraq and Afghanistan Service Grant, for which a return of Title IV funds is required.

Deadlines

Within forty-five (45) days from the date the College determined that the student withdrew, the College will return unearned funds for which the College is responsible. The student is required to pay the difference between the amount of unearned aid and the amount returned by the school. Federal regulations allow the institution to charge a student for any portion of federal funds returned on the student's behalf.

1. Within thirty (30) days from the date the College determined that the student withdrew, the College will offer a post-withdrawal disbursement, if applicable.
2. A student that does not repay the grant overpayment in full to the College or enter a repayment agreement with the College or U.S. Department of Education within the earlier of forty-five (45) days from the date the College sends a notification to the student of the overpayment, or forty-five (45) days from the date the College was required to notify the student of the overpayment will lose their eligibility for Title IV funds.
 - The letter sent to the student must inform him/her of the dollar amount owed, the method for repaying the funds, and to whom, as well as the consequences of failing to repay the funds. If the student repays the funds to the College, the financial aid office will be responsible for returning the unearned funds to the proper program.
3. Shortly after forty-five (45) days have elapsed from the date the student was informed in writing of their repayment obligation, if the student has not repaid the overpayment in full:
 - The College will report the overpayment to National Student Loan Data System (NSLDS).
 - The College will refer the student's overpayment to the U.S. Department of Education for collection. The referral must be on College letterhead.
 - The College must report any satisfactory payment arrangements on NSLDS and correctly change the status code within NSLDS to reflect the same.

Overpayment Resolution When the Overpayment Occurred Prior to Withdrawal

- For a College liability overpayment that is determined to have occurred prior to the student withdrawal, the College must repay the overpayment prior to conducting a return calculation and the overpayment will not be included in the calculation.
- For a student liability overpayment that is determined to have occurred prior to the student withdrawal, the overpayment should not be included in the calculation.
- If the student withdrew after the sixty (60) percent point, the College should attempt to collect the overpayment from the student; if not successful, report the overpayment to NSLDS, and refer it to the U.S. Department of Education Default Resolution Group.

- If the student withdrew prior to the sixty (60) percent point, the College can reduce the post-withdrawal disbursement by the overpayment, or add the overpayment to the overpayment determined by the calculation, whichever is applicable.

Revising this Procedure

This Administrative Procedure supersedes any prior WNCC policy, procedure, guideline, or handbook on this subject matter.

WNCC reserves the right to revise this procedure, as necessary, and for the changes to become effective immediately.

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