

POLICY

- The Return of Title IV Funds Official and Unofficial Withdrawals Policy applies to all programs at Frank Phillips College.
- Beginning May 11, 2023, there are no longer flexibilities for relief for students who withdrew due to COVID-19. Institutions may not use the Coronavirus Indicator for withdrawals from payment periods or periods of enrollment which begin after May 11.
- When a recipient of Title IV grant or loan assistance withdraws from an institution during a period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV assistance earned by the student as of the student's withdrawal date.
- If the total amount of Title IV assistance earned by the student is less than the amount that was disbursed to the student or on his or her behalf as of the date of the determination that the student withdrew, the difference must be returned to the Title IV programs and no additional disbursements may be made to the student for the period of enrollment.
- If the amount the student earned is more than the amount disbursed, the difference between the amounts must be treated as a post-withdrawal disbursement.
- Frank Phillips College is not required to take attendance. Therefore, the student's last date of school-documented attendance (LDA) at an academically related activity may be used as the student's withdrawal date.
 - If attendance cannot be documented, the student was never eligible for student financial aid to begin with.
 - Calendar dates prior to school holidays will be used as withdrawal date should a student withdrawal on a school holiday consisting of a five-day break.
 - For students who never attended and do not provide school-documented attendance at an academically related event, the student is treated as never attended and 100% of all funds are returned.
 - For students who unofficially withdrawal, a student earns 100% if LDA is after the completion of more than 60% of the calendar days in the payment period; otherwise, the percentage earned by the student is equal to the percentage (60% or less) of the payment period as of the students LDA – CFR 668.22(e)
- Scheduled breaks of at least five (5) consecutive days are excluded from the total number of calendar days in a period of enrollment and the number of calendar days completed in that period.
- Returns of Title IV funds are required to be deposited from or transferred to the student financial aid account, and the electronic fund transfer must be initiated to the U.S. Department of Education as soon as possible, but no later than 45 calendar days after the date the institution determines that the student withdrew.
- Summer term processing will be representative of modular programs based on the FSA Handbook

- Regardless of the last date of attendance, a R2T4 calculation must be completed and documented for each student withdrawal (official and unofficial). Student Financial Services can receive information that a student has withdrawn from several sources:
 - Date student intended to withdrawal from the Registrar
 - A college office notifies the Student Financial Services the student has requested a withdrawal for a specific term
 - Student Financial Services is notified a student has withdrawn
- If a student withdraws during a term, all aid for upcoming terms in the aid period is cancelled even if funds have already been disbursed. The student will need to contact Student Financial Services to have aid re-offered. Reinstatement of aid is subject to availability of funds at the time requested.
- For students with a consortium agreement, courses taken at a home and host institution encompass all courses enrolled for a period of enrollment.
- The amount of earned Title IV grant or loan assistance is calculated by determining the percentage of Title IV grant or loan assistance that the student has earned and applying that percentage to the total amount of Title IV grant or loan assistance that was or could have been disbursed to the student for the payment period or period of enrollment as of the student's withdrawal date.
 - A student earns 100 percent of student financial aid if his or her withdrawal date is after the completion of 60 percent of the period of enrollment.
 - The unearned amount of Title IV assistance to be returned is calculated by subtracting the amount of Title IV assistance the student earned from the amount of Title IV assistance that was disbursed to the student as of the date of the institution's determination that the student withdrew.
 - Unearned funds are returned in the following order:
 - Unsubsidized Federal Direct Stafford loans
 - Subsidized Federal Direct Stafford loans
 - Remaining Funds
 - If unearned funds remain to be returned after repayment of all outstanding loan amounts, return of funds is required in the following order:
 - Federal Pell Grants
 - Iraq & Afghanistan Service Grants
 - FSEOG
- Institutional charges are used in calculating the amount for the institution and the student to each return.
 - "Institutional charges" include tuition, fees, housing, and meals (if the student contracts with the institution for the housing and meals) and other educationally related expenses assessed by the institution.
 - If a student drops a course(s) prior to census and receives a 100% refund for the course(s), institutional charges will be calculated as of the date the course(s) were dropped.

- For students with a consortium agreement, institutional charges for both the home school and host school will be used in calculating the amount for the institution and the student to return.
- Exit counseling requirements are sent to student borrower which includes a PDF link - <https://studentaid.gov/sites/default/files/exit-counseling.pdf>.
- PDF of the guide is located in the Exit Counseling Policy and Procedure Folder
 - <I:\Policies and Procedures\Exit Counseling\exit-counseling.pdf>
- College policy states departments are only allowed to use FPC Email address for email communication.
- Frank Phillips College exercised early implementation and the conditions for such related to the final rule effective July 1, 2021. (Title 24, Code of Federal Regulations, Section 668)
- Frank Phillips College exercised early implementation for R2T4 regulations related to the final rule effective July 1, 2026, in which schools are exempt from performing an R2T4 calculation if students never began attendance, return all Title IV aid, refund institutional charges for the payment period or period of enrollment and write off any balance.

R2TIV Calculation Calendar

Prior to the beginning of academic year, Student Financial Services will set the term dates on the COD Online R2T4 calculation calendar for FPC. The dates used in the R2T4 calculation will be determined by referencing the published academic calendar.

- Utilize the published academic calendars
 - The payment period start date is the first class day for each term.
 - The payment period end date is the last day of finals for each term.
- Any scheduled breaks of five (5) or more days during a respective term must be entered on the term calendar in the R2T4 software
- In determining the 60% dates, the last date of attendance for the term must be greater than 60%. Always round the partial day up to the next date.
Example:
 - 101 days in the term. $101 * .60 = 60.5$ is the 60% date. Students would have had to attend at least 61 days to be past the 60% point of the term.

Institutional Charges

- The items to be included in the Institutional Charges for the period of enrollment are:
 - Tuition and fee charges (based on official enrollment for term and hours of enrollment that aid was disbursed) include:
 - Tuition

- Mandatory Fees
- Course Fees
- Special Instruction Fees
- Do not include any other fees (i.e., SHS Physician Fees, Parking Permits, Library Fines, etc.)
- If the student receives a waiver for part or all of the fees in the respective term, the tuition and fee charges would be before any waivers.
- If the student resides on campus, the actual Residence, Meal and Tax charges assessed should be included in Institutional Charges.
- Institutional Charges Exclusions: (Review list at the beginning of each aid year and document – add to operations calendar.)
 - Deferred initial deposit charge
 - Parking charges
 - Orientation fees
 - Late payment charge
 - Student refunds
 - Meal plans (if student does not live on campus)
 - Commuter tax
 - Commuter Ops fee
 - ID Card Replacement Fee
 - Emergency Payment Plan Fee
 - Class Ring Savings Plan
 - Book Loans
 - Housing Lock change
 - Housing Damage Fee
 - Student Insurance Premiums
 - Application fees
 - Property Damage Fees
 - Non-Title IV eligible course
 - If a charge may not be included in a student's COA, it may not be covered with Title IV aid (PADR and TSI)

UNOFFICIAL WITHDRAWALS

- Unofficial withdrawals are administered to students who earn all Fs or who did not successfully complete any of their courses in a given semester.
- If a student who began attendance, and has not officially withdrawn, fails to earn a passing grade in at least one course offered over an entire period (semester), the institution must assume, for Title IV purposes, the student has unofficially withdrawn, unless the institution can document the student completed the period.
 - A student begins earning Title IV funds on his or her first day of attendance.

- If a student did not begin the official withdrawal process or provide notification of his or her intent to withdraw, the date of the institution's determination that the student withdrew would be the date that the school becomes aware that the student ceased attendance. (34 CFR 668.22(l)(2))
- All courses taken for a grade are reviewed for academic activity
- For purposes of determining the last day during the period of enrollment, the last date of finals is utilized.
- An institution must determine the withdrawal date for a student who withdraws without providing notification to the institution no later than 30 calendar days after the end of the earlier of the period of enrollment – last date of finals.
- For each semester, prepare the following timeline:
 - Last date of classes
 - Last date of finals
 - Last date grades due to Registrar
 - All Fs administered
 - Last date students could submit paperwork (must be within 30 calendar days of the date the institution determined that the student withdrew).
 - College must give students 14 calendar days to turn in documents.
 - Last date all funds have to be returned.
 - College has 45 calendar days from the date the institution determined that the student withdrew to return any funds.
 - On date All Fs are administered, paper letters as well as electronic letters are sent to students requesting information to be provided showing dated documentation from the semester in question showing course attendance through at least 60% of the semester. If a student completed the term, completed their final exam or project, or completed equivalent of final, the last date of the term.
 - Examples of appropriate documentation include copies of syllabi and dated exams, graded papers, or letter, fax, or email from professor to individual student.
 - All withdrawals require a documented return calculation.
- Documentation showing attendance/academic engagement in a course must be received within 30 calendar days of the date of finals for a given term. The school, not the student, must document the student's active participation in an instructional activity related to the student's course of study.
 - Academic engagement activities include but are not limited to:
 - Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;
 - Submitting an academic assignment;
 - Taking an assessment or an exam;

- Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;
- Participating in a study group, group project, or online discussion that is assigned by the institution; or
- Interacting with an instructor about academic matters.
- Academic engagement does **not** include, for example:
 - Living in institutional housing;
 - Participating in the institution's meal plan;
 - Logging into an online class or tutorial WITHOUT active participation; or
 - Participating in academic counseling or advisement.
- If documentation is not received by the printed deadline (30 calendar days), the last date of attendance/academic engagement activity entered by the instructor/professor under Course Attendance in Anthology for all enrolled courses that term will be used in the R2TIV calculation to determine the amount of federal financial aid to be returned for the respective fund.
 - Exit counseling hold put on student