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## **Financial Aid Over-awards / Overpayments / Return of Title IV Funds**

In accordance with the Code of Federal Regulations (CFR), and the Higher Education Assistance Act (HEA) and its subsequent revisions, West Virginia University Hospitals (WVUH) has established the following guidelines and procedures for managing over-awards, overpayments, and the Return of Title IV funds in the event a student's eligibility changes and / or they withdraw or are dismissed from a program after the disbursement of student aid funds.

### **I. Administrative Practices**

To reduce / eliminate the possibility for over-award / overpayment situations, WVUH has implemented the following policies and practices regarding enrollment, disbursement and documentation:

1. WVUH verifies 100% of financial aid applications prior to the disbursement of any form of student aid.
2. WVUH does not disburse student aid funds until the student is physically in attendance in a program. No advanced payment disbursements are made.
3. WVUH disburses financial aid on a payment period basis and identifies that there are 2 payment periods (i.e. semesters) in each academic year.
4. WVUH does not credit student accounts with financial aid funds. Students are invoiced for institutional charges and have 3 business days after taking delivery of financial aid funds to remit payment.
5. Each student must successfully complete the clock-hours and weeks of instructional time in a payment period to progress to the next payment period. Satisfactory academic progress is evaluated at the end of each payment period, (i.e. semester) (see Academic Standards/SAP policy)
6. WVUH records daily attendance for all enrolled students.
7. All of WVUH's programs are full-time; therefore, a student's status is either full-time or not enrolled.

### **II. Over-awards**

An over-award situation would exist in the event that a student's financial aid package exceeds the student's financial need. Adjustments to the student's financial aid package will be made accordingly in over-award situations.

1. Pell grant awards will not be adjusted in recalculating the student's financial aid unless an overpayment occurs (See Section III - Overpayments)
2. Direct Loan awards (Subsidized, Unsubsidized, & PLUS) will be adjusted by one of the following:
  - a. Canceling or reducing the award prior to the 1<sup>st</sup> disbursement.
  - b. Canceling or reducing subsequent loan disbursements.
  - c. Replacing the EFC by converting Subsidized into Unsubsidized loan amounts.
3. Partial disbursements will not be made. If necessary, WVUH will return the entire award and recalculate the student's loan eligibility. A new, corrected disbursement will be issued.

### **III. Overpayments**

In the event that additional information is obtained which results in an adjustment to a student's eligibility, overpayments that have occurred will be governed as follows:

1. If a student receives a Direct Loan overpayment for a particular payment period, the FAA will, if possible, reduce or cancel the student's subsequent loan disbursement for that academic year to compensate for the overpayment. If not, the student will be required to (1) repay the excess loan amount in full, or (2) make arrangements, satisfactory to the holder of the loan, to repay the excess amount. If loan overpayment results from the student withdrawing or being dismissed from the program, obligations for repayment are outlined in Section IV – Return of Title IV Funds
2. If a student receives a Pell overpayment for a particular payment period, the FAA will reduce / cancel the student's subsequent Pell disbursement for that academic year to compensate for the overpayment.
3. If a Pell overpayment occurs due to a school error, and the FAA cannot eliminate a potential overpayment in the same academic year, the school will repay the overpayment on the student's behalf. The student will not lose Title IV eligibility nor will be reported to NSLDS or ED collections. However, the student will be required to repay the school the amount the school returned on the student's behalf. The school will work with the student to develop a mutually acceptable repayment arrangement.

Overpayments cont.

4. If a Pell overpayment occurs due to a student error, and the FAA cannot eliminate the potential overpayment in the same academic year, the student must repay the overpayment providing it is \$25 or greater. The school will contact the student by electronic or paper media stating the following:
  - a. The amount of the overpayment and the obligation of returning the funds to the school or the Department.
  - b. If the student fails to repay the overpayment or make satisfactory arrangements for repayment, the overpayment will be reported to NSLDS within 30 days of the date the overpayment was determined to occur.
  - c. The student will no longer be eligible for Title IV funds until the overpayment is resolved.
  - d. If the overpayment amount is not remitted to the school or the Department or if satisfactory repayment arrangements are not made by the 45<sup>th</sup> day after the overpayment was identified, the school will refer the overpayment to Borrowers Service's for collection.
5. The school reserves the right to withhold a student's academic transcripts or programmatic certificates until the student makes repayment or satisfactory repayment arrangements with the school and/or the Department.

#### **IV. Return of Title IV Funds**

Students, who are awarded financial aid and subsequently withdrawal from a program, may be responsible for returning a portion of disbursed funds to WVUH, the Department of Education, and/or their lender. WVUH will perform a Return of Title IV funds calculation utilizing the worksheet provided by the Department when a student ceases to be enrolled prior to the end of a payment period or period of enrollment.

#### **Withdrawal Exemptions**

All Title IV eligible programs offered at WVUH utilize standard terms and are full-time, on-campus enrollment only. Programs are not offered in modules and due to the clinical education requirements, there are no provisions for early graduation or completion. Therefore, the exemptions for performing a Return of Title IV calculation are not applicable.

#### **Withdrawal Date & Notification**

All education programs at WVUH take attendance; therefore, the student's withdrawal date will be the last documented date of attendance at an academically related activity. Each program coordinator is responsible for notifying the financial aid administrator when a student withdraws and providing the dates and clock-hours necessary to complete the worksheet.

#### **Percentage of Title IV Aid Earned**

The percentage of Title IV aid earned is determined by utilizing the student's withdrawal date to calculate the percentage of the payment period (semester) completed. The Percentage of Payment Period Completed is calculated by dividing the clock hours scheduled to be completed by the total clock hours for the semester.

1. If the Percentage of Payment Period Completed is **greater than 60%**, then the Percentage of Title IV aid earned is **100%**.
2. If the Percentage of Payment Period Completed is **equal to or less than 60%**, then that percentage will be used to calculate the amount of aid earned.

#### **Amount of Title IV Aid Earned**

The percentage of Title IV Aid earned is multiplied by the total Title IV funds disbursed plus the aid that could have been disbursed for the payment period to determine the total Title IV aid (\$) earned by the student.

#### **Title IV Aid to be Disbursed or Returned**

1. If the amount of Title IV aid disbursed for the period is less than the amount of Title IV aid earned, a post withdrawal disbursement is required. Notification will be sent within 30 days of determining that the student withdrew specifying (1) type and amount of post withdrawal funds available (2) that a student, and/or parent (i.e. PLUS loan), must confirm within 14 days that they wish to receive some or all of the loan funds (not required for grant funds) (3) the obligation of the student, or parent to repay any loan funds he or she chooses to have disbursed and (4) that upon confirmation, if applicable, WVUH will disburse funds directly to the student and/or parent within 45 days of the withdrawal determination date.
2. If the amount of Title IV aid disbursed for the period is greater than the amount of Title IV aid earned, the school, the student, or both will be required to return the unearned portion of disbursed funds.

Return of Title IV Funds cont.

3. If the amount of Title IV aid disbursed for the period is equal to than the amount of Title IV aid earned, no further action will be necessary.

### **Order of Return of Title IV Funds**

Schools and students are required to return Title IV funds to the programs from which the student received aid in the following order, up to the net unearned amount disbursed from each source:

1. Unsubsidized Direct Loans
2. Subsidized Direct Loans
3. Direct PLUS Loans (parent or graduate)
4. Federal Pell Grants
5. Iraq and Afghanistan Service Grant
6. FSEOG
7. TEACH Grants

### **Amount of Unearned Title IV Aid due from the SCHOOL**

The amount due from the school is determined by multiplying the Institutional charges for the payment period by the percentage of Title IV aid unearned (100% - Percentage of Title IV aid Earned).

1. The only Institutional charges incurred by students enrolled at WVUH are tuition and fees.

#### **Radiography & Radiation Therapy**

Tuition and fees assessed to students are \$1500.00 per payment period (semester).

#### **Magnetic Resonance Imaging**

Tuition and fees assessed to students are \$2000.00 per payment period (semester).

#### **Nutrition & Dietetics Internship**

Tuition and fees assessed to students are \$2,250.00 per payment period (semester).

2. WVUH will electronically return the unearned funds for which it is responsible as soon as possible, but no later than 45 days from the determination of a student's withdrawal.

### **Amount of Unearned Title IV Aid due from the STUDENT**

The amount due from the student is calculated by subtracting the amount of Title IV aid due from the school from the total Title IV funds to be returned. The remaining amount must be returned by the student to the sources listed below in order of their listing until the total amount is repaid with the following exceptions:

1. Grant overpayments of \$50 or less are considered de minimus and do not have to be repaid.
2. A student is only required to return 50% of the disbursed Pell grant funds that are determined to be the responsibility of the student to repay.

### **Return of Funds by the Student**

The procedures governing the return of funds are determined by the source of the funding:

1. Loan programs (Direct Subsidized, Unsubsidized & PLUS loans)
  - a. The student and/or the parent must return funds to loan programs in accordance with the terms of the Master Promissory Note.
2. Pell Grants
  - a. The student returns funds to grant programs as an overpayment.
  - b. Grant overpayments are subject to repayment arrangements satisfactory to the school, or overpayment collection procedures prescribed by the USDE.

### **Reporting and Referring**

Within 30 days of determining that a student withdrew, the school will send notification that ...

1. The student owes an overpayment and is required to return all or part of the Title IV funds they received.
2. The student has 45 days from the date of notification to either,
  - a. Repay the overpayment in full to the school.
  - b. Sign a repayment agreement with the school (not to exceed two years)

Reporting and Referring cont.

- c. Sign a repayment agreement with the Department.
3. If the student fails to take one of the positive actions listed above prior to the 45 day deadline,
  - a. They will no longer be eligible for Title IV funds until the overpayment is resolved.
  - b. The school will be required to report the overpayment to NSLDS.
  - c. The school will be required to refer the overpayment to Default Resolution Group for collection.
4. The student should contact the school to discuss their options.



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Education Manager