

**BURRELL COLLEGE  
OF OSTEOPATHIC MEDICINE  
POLICY MANUAL**

SECTION: Students

BCOM Policy B9511

TOPIC: Withdrawals and Return of Title IV Funding

Approval Date: 8/10/17  
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Approved: Signature on File

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**POLICY**

BCOM shall comply with the Higher Education Act (HEA) Amendments of 1998, Section 484B, as well as the program integrity regulations, 34 CFR 668.22, regarding the treatment of Title IV funds when a student withdraws from the College.

**RESPONSIBLE OFFICIAL(S):**

Director of Financial Aid

**DEFINITIONS:**

**Official Withdrawal** – An official withdrawal is one where the student has provided notice of their intent to cease attending school. A student is also considered an official withdrawal if they drop or withdraw from all current classes in a specific term, but are still enrolled in upcoming module courses in the same term and have not informed in writing to the Office of Financial Aid that they will be attending those courses.

**Unofficial Withdrawal** – An unofficial withdrawal is one where we have not received notice from the student that the student has ceased attending school. If a student receives all non-passing grades, they are considered to be an unofficial withdrawal. If a student begins to attend class, receives federal Title IV aid, but then ceases to attend class without providing official notification to BCOM, the Federal Government considers this to be an "unofficial withdrawal". The Office of the Registrar reports the withdrawal date used for the Return of Title IV Funds calculation. However, if BCOM determines that a student did not provide official notice of the intent to withdraw due to illness, accident, grievous personal loss or other circumstances beyond the student's control, the BCOM Office of Financial Aid may use a date that is related to that circumstance. The refund rules for Title IV aid recipients who withdraw are then followed to determine the unearned portion of Title IV aid that must be returned to the appropriate aid program(s).

**Modular Withdrawals** – If a student is enrolled in a standard, term-based program offered in modules (subterms) and ceases attendance at any point prior to completing the payment period or period of enrollment, unless the school obtains written confirmation from the student at the time of the withdrawal that he or she will attend a module that begins later in the same payment period or period of enrollment, the student is considered a withdrawal for Title IV purposes. If written confirmation of future attendance is received from the student but the student does not return as scheduled, the student is considered to have withdrawn from the payment period or period of enrollment and the student's withdrawal date and the total number of calendar days in the payment period or period of enrollment would be the withdrawal date and total number of calendar days that would have applied if the student had not provided written confirmation of future attendance.

**Leave of Absence** - A leave of absence (LOA) is a temporary interruption in a student's program of study. LOA refers to the specific time period during a program when a student is not in attendance. An LOA must meet certain conditions and procedures set forth by the BCOM Policy B9090 to be counted as a temporary interruption in a student's education instead of being counted as a withdrawal requiring a school to perform a Return calculation. The LOA, together with any additional leaves of absence, must not exceed a total of 180 days in any 12-month period. A student granted an LOA that meets the criteria set forth in the BCOM Leave of Absence Policy is not considered to have withdrawn, and no return calculation is required.

**PROCEDURES:**

1. When a student is considered to have withdrawn, as described above, during an enrollment period in which they have begun attendance and received federal Title IV financial aid, BCOM is required to determine the amount of earned and unearned Title IV aid. Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded.
2. When a student withdraws or is dismissed during the current enrollment or payment period, a calculation is performed to determine if the student is entitled to the full assistance received during that period. BCOM must return any unearned aid that was applied to institutional charges. For example, if a student was enrolled for 30% of the enrollment period, the student is entitled to only 30% of the aid received; thus, 70% of the aid must be returned. The student is required to pay the returned amount back to BCOM and will be notified in writing. Once a student has completed more than 60% of the payment or enrollment period, the student has earned all assistance that the student was scheduled to receive for that period. No return of funds is required.
3. If the student did not receive all of the funds that were earned prior to withdrawal, the student may be due a Post-Withdrawal disbursement which is determined during the Return of Title IV Funds calculation. The Office of Financial Aid will notify the withdrawn student in writing of his or her eligibility for a Post-Withdrawal disbursement.
4. The Office of Financial Aid Office will receive the reported withdrawal date that is utilized for the Return of Title IV calculation from the Office of the Registrar.
5. The formula used to calculate the percent of aid earned is the total number of days completed divided by the total days in the enrollment or payment period. The remaining percentage is considered “unearned” and will be returned by the school to the federal aid programs.

**Number of days completed = Percentage Earned / Total Days in the Enrollment or Payment Period**

6. Institutional charges are used to determine the portion of unearned Federal Student Aid that the school is responsible for returning. The student is responsible for all unearned Title IV program assistance that the school is not required to return. Unearned funds are attributed to Title IV programs in the following order: Direct Unsubsidized Stafford Loan, Direct Grad PLUS Loan. The student repays unearned loan funds on the normal loan repayment schedule as stated in the MPN and/or Disclosure Statements. Unearned funds returned by BCOM will be repaid to the appropriate Title IV program no later than 45 days after the withdrawal date.
7. A post-withdrawal disbursement is the Title IV aid that was not disbursed before a student withdrew, but which the student had earned based on a Return of Title IV funds calculation. Post withdrawal disbursements are made no later than 180 days after the withdrawal date. The amount of a post-withdrawal disbursement is determined by following the requirements for calculating the “earned” Federal Student Aid funds. For a post-withdrawal disbursement, a withdrawn student must have accepted the loan (Direct Unsubsidized Loan or Grad PLUS) and completed the MPN before the withdrawal date.

**CROSS REFERENCES:**

Policy B9500 Title IV Compliance  
Policy B9090 Leave of Absence