EHL HOSPITALITY BUSINESS SCHOOL



FAFSA US LOANS:
Withdrawing and return to Title IV policy

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1. Purpose

Title IV funds are awarded to students on the assumption that they will attend EHL Hospitality Business School (EHL) for the entire payment period for which the aid was awarded.

When a student receiving Title IV aid withdraws, ceases attendance, takes a leave of absence that does not satisfy applicable federal requirements, or otherwise loses eligibility during a payment period, EHL must determine the amount of Title IV aid earned and, where required, return unearned funds in accordance with federal regulations governing Return of Title IV Funds (R2T4).

This policy describes how EHL:

- determines withdrawal status;
- establishes withdrawal dates and dates of determination;
- calculates earned and unearned Title IV aid;
- administers Return of Title IV Funds calculations;
- processes post-withdrawal disbursements; and
- fulfills associated federal reporting and compliance obligations.

The Bachelor of Science in Hospitality Management (BOSC) and Master of Science in Hospitality Management (MiHM) programs are delivered on a full-time basis and operate on a semester academic calendar. Students receiving U.S. federal aid must maintain enrollment consistent with EHL's approved full-time program structure.

2. Scope

This policy applies to all students receiving U.S. Title IV federal student aid while enrolled in an EHL program approved for participation in U.S. Federal Student Aid programs.

For Title IV purposes, EHL's approved programs are organized on a semester-hour basis and follow a semester academic calendar. References in this policy to a payment period should generally be understood as referring to an academic semester unless federal regulations require otherwise.

This policy applies solely to the administration of U.S. federal student aid. It operates separately from, but is informed by:

- Rules & Regulations applicable to the student's program of study;
- Student Directives;
- Deferment & Withdrawal Directives;
- EHL tuition and fee refund policies;
- the Satisfactory Academic Progression policy.

Where institutional and federal terminology differ, federal Title IV definitions shall apply exclusively for purposes of U.S. federal student aid administration.

3. Definitions

Withdrawal

For Title IV purposes, a student is considered withdrawn when the student ceases attendance before completing all days in the payment period that the student was scheduled to complete and no applicable withdrawal exemption applies.

Withdrawal Date

The withdrawal date is the date used to determine the percentage of Title IV aid earned by the student.

Date of Determination

The date of determination is the date EHL determines that the student withdrew. The date of determination is used to establish regulatory deadlines relating to:

- return of Title IV funds;
- notifications regarding post-withdrawal disbursements;
- documentation requirements;
- record retention requirements.

The withdrawal date and date of determination are not necessarily the same.

Payment Period

For Title IV purposes, a payment period is the period used by EHL to determine aid eligibility and Return of Title IV Funds calculations.

For EHL's semester-based programs, a payment period normally corresponds to an academic semester.

4. Withdrawal Exemptions

Before performing an R2T4 calculation, EHL will determine whether the student qualifies for any withdrawal exemption established under applicable federal regulations.

Where a withdrawal exemption applies, the student may not be considered withdrawn for Title IV purposes and an R2T4 calculation may not be required.

5. Official Withdrawal

An official withdrawal occurs when a student notifies EHL of the intention to withdraw in accordance with institutional procedures.

Students wishing to withdraw must submit a written withdrawal request through Academic Advisory/Student Affairs in accordance with EHL procedures.

For Title IV purposes, the withdrawal date will generally be:

- the date the student begins EHL's withdrawal process; or
- the date the student otherwise provides official notification of the intention to withdraw,

as determined under applicable federal regulations.

6. Unofficial Withdrawal

An unofficial withdrawal occurs when a student ceases attendance without formally notifying EHL.

EHL is not required, under Title IV regulations, to take attendance. Determinations regarding unofficial withdrawals are therefore based on institutional records and documented evidence of cessation of attendance rather than attendance-taking records.

EHL must determine that the student withdrew no later than 30 days after the end of the earlier of:

1. the payment period;
2. the academic year; or
3. the student's educational program.

EHL will document the basis used to determine that the student ceased attendance and retain such documentation in accordance with applicable federal record-retention requirements, including but not limited to:

- confirmed withdrawal from studies;
- non-return following an approved deferment;
- definitive failure;
- ex-matriculation;
- documented notifications received from Academic Advisory/Student Affairs; or
- other reliable institutional evidence.

EHL terminology note:

Definitive failure is an academic status and is not itself a Title IV withdrawal category. EHL will assess separately whether a definitive failure also results in a Title IV withdrawal.

7. Deferment and Leave of Absence

Students requesting a deferment must follow EHL's Deferment & Withdrawal Directives and submit a written request to Academic Advisory/Student Affairs.

An approved EHL deferment does not automatically constitute an approved Leave of Absence for purposes of Title IV regulations.

EHL's Finance Department will evaluate each absence separately to determine whether the leave satisfies applicable federal conditions for an approved Leave of Absence.

Where those conditions are not met, the student may be treated as withdrawn for purposes of Title IV aid administration.

8. Re-Entry Following Withdrawal or Leave

Students seeking to return following withdrawal, deferment, or ex-matriculation remain subject to EHL readmission requirements established in the Rules & Regulations applicable to the student's program of study and associated institutional procedures.

Federal student aid treatment following a return to study will be determined separately in accordance with applicable federal regulations.

EHL terminology note:

Institutional readmission decisions and Title IV eligibility determinations are separate processes. Compliance with EHL readmission requirements does not automatically determine a student's federal aid eligibility upon return.

9. Earned and Unearned Title IV Aid

EHL determines earned Title IV aid using the Return of Title IV Funds methodology established by federal regulations.

Earned aid is calculated based on the proportion of the payment period completed by the student prior to withdrawal.

Up to the point at which a student completes 60% of the payment period, earned aid is calculated on a prorated basis.

Once the student completes more than 60% of the payment period, the student is considered to have earned 100% of the Title IV aid scheduled to be received for that payment period.

Institutional tuition refund policies do not affect the amount of Title IV aid earned under federal R2T4 regulations.

10. Return of Title IV Funds Calculation

For Title IV purposes, EHL administers approved semester-hour programs and uses semester-based payment periods. Return of Title IV Funds calculations are therefore performed using the methodology applicable to semester-based payment periods. The approved academic calendar for EHL's Title IV eligible programs is semester-based.

When a student withdraws before completing a payment period, EHL determines the amount of Title IV aid earned as of the student's withdrawal date using the Return of Title IV Funds methodology established by applicable federal regulations and the U.S. Department of Education.

The calculation determines:

- the percentage of Title IV aid earned;
- the amount of Title IV aid earned;
- the amount of Title IV aid unearned;
- the amount of aid, if any, that EHL must return;
- the amount of aid, if any, that remains the responsibility of the student; and
- whether a post-withdrawal disbursement is due.

Step 1: Student's Title IV Aid Information

EHL identifies all Title IV aid for the payment period under review, including:

- Title IV aid that was disbursed; and
- Title IV aid that could have been disbursed in accordance with applicable federal requirements.

Step 2: Percentage of Title IV Aid Earned

The percentage of Title IV aid earned is determined by dividing the number of calendar days completed in the payment period by the total number of calendar days in the payment period.

Scheduled breaks of five or more consecutive days are excluded from the calculation, where required by federal regulations.

Formula

Percentage Earned =

$$\frac{Number\ of\ Calendar\ Days\ Completed}{Total\ Calendar\ Days\ in\ Payment\ Period} \ x100$$

Once the student completes more than 60% of the payment period, the student is considered to have earned 100% of the Title IV aid scheduled to be received for that payment period.

Step 3: Amount of Title IV Aid Earned

The amount of Title IV aid earned is calculated by multiplying the percentage earned by the total amount of Title IV aid that was disbursed and could have been disbursed for the payment period.

Formula

$$Title\ IV\ Aid\ Earned = Percentage\ Earned \times Total\ Title\ IV\ Aid$$

Step 4: Total Title IV Aid to Be Disbursed or Returned

The amount of aid earned is compared to the amount already disbursed.

- If earned aid exceeds disbursed aid, the student may be eligible for a post-withdrawal disbursement.
- If disbursed aid exceeds earned aid, the difference constitutes unearned aid that must be returned in accordance with federal regulations.

Step 5: Amount of Unearned Title IV Aid Due from EHL

EHL determines the amount of unearned aid for which it is responsible.

In general, EHL returns the lesser of:

- the total amount of unearned Title IV aid; or
- the institutional charges incurred for the payment period multiplied by the percentage of aid not earned.

Step 6: Return of Title IV Funds by EHL

EHL returns unearned Title IV funds for which it is responsible in accordance with the order of return prescribed by federal regulations.

All required returns are made within the applicable federal deadlines measured from the date of EHL's determination that the student withdrew.

Step 7: Unearned Title IV Aid Due from the Student

Where applicable, any remaining unearned aid not returned by EHL is allocated to the student in accordance with federal requirements. EHL will inform affected students of any obligations arising from the Return of Title IV Funds calculation.

Step 8: Outstanding Loan Obligations

Any loan funds remaining outstanding after completion of the Return of Title IV Funds calculation continue to be repaid under the terms and conditions of the applicable promissory note and federal student loan regulations.

Post-Withdrawal Disbursements

Where the calculation determines that the student earned more aid than was disbursed prior to withdrawal, EHL will determine whether a post-withdrawal disbursement may be made and will:

- determine eligibility for a post-withdrawal disbursement (PWD);
- provide required notifications within applicable deadlines;
- obtain any required student confirmations;
- disburse eligible funds within applicable federal timeframes.

PWDs are administered in accordance with applicable federal regulations, including notification, confirmation, and disbursement requirements.

Students may accept or decline all or part of any loan-related post-withdrawal disbursement in accordance with federal requirements

11. Return of Funds

If the amount of Title IV aid disbursed exceeds the amount earned, the unearned portion must be returned.

EHL will return the amount for which it is responsible in accordance with applicable federal regulations and the prescribed federal order of return.

Any remaining student responsibility will be addressed in accordance with applicable federal student aid requirements.

12. Institutional Charges

Institutional charges are used solely to determine the portion of unearned Title IV aid that EHL may be required to return.

Institutional charges do not affect the amount of Title IV aid earned by the student. Institutional refund policies remain separate from Return of Title IV Funds calculations.

13. Verification and Withdrawals

When a student selected for verification withdraws, EHL will administer Title IV aid in accordance with applicable federal verification and Return of Title IV Funds requirements.

Verification treatment shall follow the guidance applicable to the relevant award year in effect at the time of withdrawal.

EHL will use current FAFSA Submission Summary (FSS), Institutional Student Information Record (ISIR), Student Aid Index (SAI), or other applicable federal terminology and processes, as prescribed by the U.S. Department of Education.

14. Deadlines

EHL will comply with all applicable federal deadlines relating to:

- withdrawal determinations;
- Return of Title IV Funds calculations;
- returns of unearned Title IV aid;
- post-withdrawal disbursement notifications;
- post-withdrawal disbursements;
- documentation and record retention requirements.

Where federal regulations are amended, the applicable federal requirements shall prevail over any conflicting wording contained in this policy.

15. Related EHL Documents

This policy should be read together with:

- Rules & Regulations applicable to the student's program of study;
- Deferment & Withdrawal Directives;
- Student Directives;
- Satisfactory Academic Progress Policy;
- Consumer Information Guide;
- Program Participation Agreement (PPA);
- Eligibility and Certification Approval Report (ECAR).

For further information regarding these rules and regulations, please contact EHL's Finance Office: finance@ehl.ch Or call the US Federal Student Aid Information Center on +1 800 433 3243.

Information is also available at www.studentaid.ed.gov.

N.B. Amendments to Policy: This policy will be amended whenever US law or regulations are changed. Upon approval of EHL's Executive Dean, EHL's Finance Office is authorized to incorporate and implement changes required in this policy by laws or regulations that govern US Federal Aid.