



Return to Title IV (R2T4)

GSA Guidance / US Department of Education Regulations

US Department of Education regulations specify how the Glasgow School of Art (GSA) must determine the amount of Title IV program assistance (US Federal Loans) that students earn if they withdraw from their studies. For R2T4 purposes a Leave of Absence (LOA) for longer than 180 days or an unauthorised LOA is also deemed to be a withdrawal (see further details and definitions below). This Return to Title IV policy applies to any student who began attendance and then withdrew.

At the Glasgow School of Art the Student Welfare Adviser is responsible for calculating R2T4 and the Finance Office is responsible for transferring the funds. The Student Welfare Adviser uses worksheets and software provided by the US Department of Education to calculate the R2T4 funds. All funds must be returned to the US Department of Education within 45 days of the date on which GSA determined that a student withdrew. If an R2T4 calculation results in a credit balance on the student’s GSA account, that credit balance will be disbursed as soon as possible and no later than 14 days after the calculation of R2T4

If you have questions about your Title IV program funds, you can call the Federal Student Aid Information Center at 1-800-4-FEDAID (1-800-433-3243). TTY users may call 1-800-730-8913. Information is also available on Student Aid on the Web at www.studentaid.ed.gov

When a student withdraws during a payment period, the amount of Title IV program assistance that has been earned up to that point is determined by a specific formula:

$\frac{\text{Number of study days completed}}{\text{Total number of study days in payment period or period of enrolment}} = \% \text{ Loan Funds Earned}$

The date of withdrawal is considered to be the student’s last date of academic attendance, as recorded by the Academic Department’s attendance monitoring procedure. This date will be recorded by the Programme Leader in the Withdrawal Request Form. If the student received (or GSA received on the student’s behalf) less assistance than the amount earned, the student may be able to receive those additional funds. If the student received more assistance than was earned, the excess funds must be returned by GSA and/or the student.

The attendance of students is monitored by Academic Departments and communicated to Registry, who request confirmation from the relevant Programme Leaders that student’s attendance is acceptable. This is evidenced by class registers for taught students and fortnightly performance meetings for research students. Poor attendance is initially addressed by the Programme Leader and subsequently reported to Registry who send a formal warning letter to the student if their attendance does not improve.

Where a student notifies the Programme Leader or a staff member that he/she intends to withdraw, the student must be informed of the need to complete the official Withdrawal Request Form. The Programme Leader must also document the student's last date of academic attendance and pass this information to Registry.

In the event that a student's academic progress during an assessment period is unsatisfactory leading to withdrawal/termination, and it is determined that this was the result of lack of attendance, the Programme Leader will communicate the last day of consistent academic attendance and that date will be used in the R2T4 calculations. Students who do not attend at all are ineligible for Title IV funds and all of the loan proceeds will be returned to the US Department of Education.

The date of determination that a student withdrew will be no later than 14 days after the student's last date of academic attendance.

The Glasgow School of Art Student Withdrawal Procedure can be viewed here:

<http://www.gsa.ac.uk/media/1255904/Student-Withdrawal-Procedure.pdf>

The Glasgow School of Art Student Attendance Policy can be viewed here:

<https://www.gsa.ac.uk/media/1255901/Student-Attendance-Policy.pdf>

The Glasgow School of Art Student Absence Policy can be viewed here:

<https://www.gsa.ac.uk/media/1255898/Student-Absence-Policy.pdf>

The level of assistance earned is determined on a pro rata basis. The payment period is the period that the loan was certified for and the percentage of attendance is calculated by dividing the number of days attended by the total number of days in the payment period. For example, if the student completes 30% of the payment period or period of enrolment, the student has earned 30% of the financial assistance they were originally scheduled to receive. Once the student has completed more than 60% of the payment period or period of enrolment, all the assistance that the student was scheduled to receive for that period is considered to have been earned. The GSA Student Welfare Adviser will use the R2T4 worksheets as provided by the US Department of Education to determine how much of the loan may be retained and how much must be returned.

If the student did not receive all of the funds that were earned, he/she may be due a post-withdrawal disbursement. If a post-withdrawal disbursement of loans is due, GSA will contact the student (or parent for Parent PLUS loan) within 30 days of the date of determination that a student withdrew. The post-withdrawal disbursement notification will advise students of the loan amounts available, any outstanding institutional charges and the student's options. Students will be granted a minimum of 14 days to respond to the post-withdrawal disbursement notification. Loan funds will be returned to the US Department of Education if the student does not respond after 14 days and a notification being sent twice. Once we have received confirmation of acceptance of the post withdrawal disbursement we will process this as soon as possible, but no later than 45 days after date of determination of withdrawal. The post-withdrawal notification will communicate the obligation of the student, or parent in the case of a parent PLUS loan, to repay any loan funds he or she chooses to have disbursed. As the post-withdrawal disbursement includes loan funds, the student may choose to decline the loan funds so that additional debt is not incurred.

GSA may automatically use all or a portion of the student's post-withdrawal disbursement (if the student accepts them) to pay outstanding tuition and other fees (as contracted with GSA). For all other GSA charges, GSA requires the student's permission to use the post-withdrawal disbursement and students are asked to give this permission at enrolment. If the student does not give permission the student will not be offered the funds.

There are some Title IV funds that students cannot earn when they have withdrawn because of other eligibility requirements. For example, in certain circumstances, if a first-time, first year undergraduate student has not completed the first 30 days of the programme before withdrawal, the student will not earn any of the loan funds that he/she would have received had the student remained enrolled past the 30th day.

If the student receives (or GSA receives on behalf of the student) excess Title IV program funds that must be returned, GSA must return a portion of the excess equal to the lesser of:

1. The institutional charges multiplied by the unearned percentage of the funds or
2. The entire amount of excess funds.

GSA must return this amount even if GSA did not retain this amount of the Title IV program funds. If GSA is not required to return all of the excess funds the student must return the remaining amount. Any loan funds to be returned by the student are repaid in accordance with the terms of the promissory note.

Title IV funds will be returned in the following order:

- 1. Unsubsidized Federal Stafford loans**
- 2. Subsidized Federal Stafford loans**
- 3. PLUS Loan Funds**

The requirements governing Title IV program funds when students withdraw are separate from the Glasgow School of Art Tuition Fee Liability Policy. Therefore, the student may still owe funds to the GSA for unpaid institutional charges. GSA will attempt to collect from the student any Title IV program funds that GSA was required to return. The Glasgow School of Art Tuition Fee Liability Procedure can be viewed here:

<http://www.gsa.ac.uk/media/1215135/tuition-fee-liability.pdf>

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Leave of Absence (LOA) and Withdrawals for Title IV (US Loans) Purposes

Definitions:

Approved Leave of Absence (LOA)

A Leave of Absence is a temporary and approved interruption in a student's programme of study. LOA refers to the specific time period during a programme when a student is not in attendance and intends to return to complete the programme. Students returning from a LOA are not required to re-apply for admission but must re-register for their course.

Unapproved Leave of Absence

Glasgow School of Art may grant a student a LOA that does not meet the conditions to be an approved LOA for Title IV purposes. However, any LOA that does not meet all of the conditions for an approved LOA is considered a withdrawal for Title IV purposes.

Withdrawal

A 'withdrawal' refers to a student's intent to completely terminate studies at an institution with no expectation of return. Students who subsequently decide to return to their studies must re-apply for admission through the Registry Office.

The Glasgow School of Art Leave of Absence Procedure can be viewed here:

<http://www.gsa.ac.uk/media/1090495/LEAVE-OF-ABSENCE-GUIDANCE-2015.pdf>

The Glasgow School of Art Student Withdrawal Procedure can be viewed here:

<http://www.gsa.ac.uk/media/1255904/Student-Withdrawal-Procedure.pdf>

LOA and Withdrawal Request Forms

The forms required by students to request a LOA or a Withdrawal are available from Academic Support Managers.

Approved LOA's

A Leave of Absence must meet certain conditions to be considered a temporary interruption in a student's education instead of a withdrawal requiring GSA to perform a Return of loan funds calculation. If a LOA does not meet the conditions and the student is considered to have ceased attending and to have therefore withdrawn from GSA, GSA is required to perform a Return calculation.

In order for an LOA to qualify as an approved LOA:

1. All requests for LOA's to be submitted in writing to the Programme Leader and include the reason for the student's request. The form must be signed and dated by the student and specify the date the student wants the LOA to begin and end.
2. Students must apply in advance for an LOA unless unforeseen circumstances prevent the student from doing so.

3. The reason for the LOA request must be generally non-academic in nature and must be one that leads to a reasonable expectation that the student will return from the LOA within the allowed timeframe.
4. The LOA together with any additional leave must not exceed a total of 180 days in any 12 month period including days in which GSA is not in session.

All requests for LOA's will be reviewed by the Programme Leader and the Head of Registry. The student will be notified in writing by the Registry Office of GSA's decision.

During the LOA, the institution will not assess the student for any additional institutional charges, the student's financial need will not increase, and therefore, the student will not be eligible for any additional disbursement of Federal Student Aid.

GSA will explain to the student, prior to granting the LOA, the effects that the student's failure to return from a LOA may have on the student's loan repayment terms, including the expiration of the student's grace period.

A student granted a Leave of Absence that meets the criteria stated above is not considered to have withdrawn and no Return calculation is required. Upon the student's return from LOA, he/she continues to earn the Federal Student Aid previously awarded for the period.

Completion of Coursework Upon Return

In as much as an approved Leave of Absence is viewed as a temporary interruption in a student's attendance, and since the academic programmes at GSA are considered semester-based programmes, where the payment period is the semester, a student returning from a LOA must do so at a time when he/she can complete the semester in order to complete the payment period and be eligible to receive a second or subsequent disbursement.

Students Who Return Earlier Than Anticipated

GSA may permit a student to return to GSA before the expiration of the student's LOA in order to review material previously covered. However, until the student has resumed the academic programme at the point where he/she began the LOA, the student is considered to be on the approved LOA. The days the student spends in GSA before the course reaches the point at which the student began his/her LOA must be counted in the 180 days maximum period for an approved leave of absence. A student repeating coursework while on LOA must reach the point at which he/she interrupted within the 180 days of the start of the student's LOA.

Students Who Fail to Return from LOA's

If a student does not return to GSA at the expiration of an approved LOA (or a student takes an unapproved LOA), the student's withdrawal date is the date the student began the LOA.

Explanation of Consequences of Withdrawal to Loan Recipients

A student who is granted an approved LOA is considered to remain in an in-School status for Title IV loan repayment purposes. If a student on an approved LOA failed to return, the GSA must report to the US Department of Education the student's change in enrolment status as of the withdrawal date. One possible consequence of not returning from a LOA is that a student's grace

period for a Title IV program might be exhausted. Therefore in order for an LOA to be an approved LOA, prior to granting a leave of absence, GSA must inform a student who is a Title IV loan recipient of the possible consequences a withdrawal may have on the student's loan repayment terms, including the exhaustion of the student's grace period.

Unapproved LOA's

GSA may grant a student a LOA that does not meet the conditions to be an approved LOA for Title IV purposes. However, any LOA that does not meet all of the conditions for an approved LOA is considered a withdrawal for Title IV purposes. The student's withdrawal date is the date the student begins the LOA.