Return of Title IV Funds
R2T4
Participant’s Guide
December 2011
RETURN OF TITLE IV FUNDS

OVERVIEW

AND

PRINCIPLES
# RETURN OF TITLE IV FUNDS

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CHECKPOINT #1

Circle True or False

- T/F – An R2T4 calculation is not required for students who drop out during our add/drop period

- T/F – R2T4 calculations are required when a student withdraws from all of his/her classes

- T/F – An R2T4 calculation must be performed for all students

- T/F – A school’s institutional refund policy impacts the federal R2T4 calculation

- T/F – A student who leaves without telling the school does not cause the school to do an R2T4 calculation

Return of Title IV Funds is often referred to as R2T4. Throughout this training, we will use both terms.
R2T4 THEORY AND PRINCIPLES

Students must be enrolled in an eligible Title IV program and be eligible students receiving Title IV aid in order for the R2T4 requirements to apply. The student must also withdraw from all of his/her classes. If a student withdraws from only some of his/her classes, that student is not a withdrawal, and R2T4 would not apply in that situation. However, if a student withdraws from some of his/her classes prior to establishing attendance in all of his/her classes, you need to recalculate the student’s eligibility for Pell and Campus-based funds based on a revised cost of attendance and enrollment status.

Students earn Title IV aid through attendance in the payment period or period of enrollment. The percent that the student earns is equal to the percent of the payment period or period of enrollment that the student completes. If the school has disbursed more aid than the student has earned, money must be returned to the Title IV programs. If the school has disbursed less aid than the student has earned, the student is due a post-withdrawal disbursement. The school must complete the R2T4 calculation in order to determine which of these scenarios is applicable when a student withdraws or otherwise ceases attendance in all of his/her classes.

Institutional Refund Policy

A school’s institutional refund policy has no impact on the R2T4 calculation. If a school chooses to either reduce or eliminate altogether a student’s institutional charges after the student has withdrawn, that changes neither the amount of aid the student has earned, nor the amount of institutional charges that are used in the R2T4 calculation.
Consumer Information

Schools are required to provide information to their students as part of the Title IV regulations. Schools are required to provide, at a minimum:

- The requirements and procedures for officially withdrawing from the school
- Any refund policy with which the school is required to comply for the return of unearned tuition and fees or other refundable portions of costs paid to the school
- A summary of the requirements for the return of FSA grant or loan funds
- The school’s tuition refund policy

These requirements are covered in the Federal Student Aid Handbook, Volume 2.
TITLE IV PROGRAM REGULATIONS IMPACT R2T4 CALCULATIONS

Title IV regulations related to R2T4 are often impacted by other regulations, as all of the Federal Student Aid programs regulations are linked together. The information below is not intended to provide guidance on how you should structure your programs, but rather merely to offer guidance needed for you to complete the Return calculation.

Non-standard terms not substantially equal in length

In credit hour non-standard term programs where terms are not substantially equal in length, it is possible that the payment periods could not be aligned for all Title IV grant and loan programs. For grants and Perkins loans, the payment period is the non-standard term.

However, for Direct Loans, the payment period is one-half the credit hours and one-half the weeks of instructional time. That leaves the possibility that a student will withdraw during overlapping payment periods.

In this scenario, if a student withdraws during overlapping payment periods, any funds disbursed in both payment periods are included as aid disbursed in the R2T4 calculation.

If, in the payment period that ends later, there are funds that have been or could have been disbursed from overlapping payment periods, the school must include in the Return calculation any funds that can be attributed to the payment period that ends later.

Standard credit hour terms with modules

The regulations published on October 29, 2010 provided a new definition of “module,” and specified revised guidance regarding when a student is enrolled in a standard term-based credit hour program consisting of modules. These changes were made to ensure equitable treatment for students who withdraw from all programs of study, especially those term-based or non-term based programs offered in modules.
We have revised the definition of a module to be a course or courses that do not span the entire length of the payment period or period of enrollment. Students who are enrolled in programs offered in modules and do not complete all of the calendar days in which he or she was scheduled to attend are considered to be withdrawn and an R2T4 calculation must be completed.

To help you determine whether a student enrolled in one of these programs would be subject to a Return calculation, we have provided you the following three questions:

1) Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?

   - **YES**
     - Go to Question Number 2
   - **NO**
     - Student NOT a withdrawal

2) When ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses?

   - **YES**
     - Student NOT a withdrawal
   - **NO**
     - Go to Question Number 3

3) Did student confirm attendance in a later module within the payment/enrollment period (45-day rule might be applicable)?

   - **YES**
     - Student NOT a withdrawal (recalculations may apply)
   - **NO**
     - Student is a withdrawal and Return calculation necessary

For more information regarding withdrawals from modules, please see Appendix E.

**Enrollment in modules as well as full-term courses in a payment period**

If a student is enrolled in modules as well as courses that span the entire length of the payment period and the student withdraws from all of the modules they were enrolled in but continues to be enrolled in and completes the course that spanned the entire length of the payment period, the student has not withdrawn and no R2T4 calculation is required.
**Verification**

The following rules apply when a school is completing a Return calculation for a student who is subject to verification:

1. A school must always return any unearned Title IV funds it is responsible for returning within 45 days of the date the school determined the student withdrew, and offer any Post-withdrawal disbursement of loan funds within 30 days of that date.

2. A school must disburse any Title IV grant funds a student is due as part of a Post-withdrawal disbursement within 45 days of the date the school determined the student withdrew, and disburse any loan funds a student accepts within 180 days of that date.

3. Unless a student subject to verification has provided all required verification documents in time for the school to meet the Return deadlines, the school includes as Aid Disbursed or Aid That Could Have Been Disbursed in the Return calculation only those Title IV funds not subject to verification.

4. If a student who failed to provide all required verification documents in time for the school to meet the Return deadline later provides those documents prior to the applicable verification deadline, the school must perform a new Return calculation on all of the aid the student qualified for based on the completed verification documents and make the appropriate adjustments.

**Leave of Absence Policy**

A leave of absence (LOA) is a temporary interruption in a student’s program of study. An LOA must meet certain criteria to be counted as a temporary interruption in a student’s education instead of being counted as a withdrawal that would be subject to a Return calculation. Unless the LOA meets the conditions as noted on the following page, the student is considered withdrawn and the school is required to perform a Return calculation.
LEAVE OF ABSENCE

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

1. The school must have a formal written policy regarding leaves of absence requiring that all requests for leaves of absence be submitted in writing and include the reason for the student’s request;
2. The student must follow the school’s policy in requesting the LOA;
3. There must be a reasonable expectation that the student will return from the LOA;
4. The school must approve the student’s request for an LOA in accordance with the school’s policy;
5. The institution may not assess the student any additional institutional charges, the student’s need may not increase, and therefore, the student is not eligible for any additional Federal Student Aid;
6. The LOA together with any additional leaves of absence must not exceed a total of 180 days in any 12-month period;
7. Except in a clock-hour or nonterm credit-hour program, a student returning from an LOA must resume training at the same point in the academic program that he or she began the LOA; and
8. If the student is a Title IV loan recipient, the school must explain to the student, prior to granting the LOA, the effects that the student’s failure to return from an LOA may have on the student’s loan repayment terms, including the expiration of the student’s grace period.
DEADLINES

Two main deadlines impact most Return of Title IV Funds calculations:
– the 45-day timeframe for the Return of Funds; or the 30-day required notification of the need for authorization to make a Post-withdrawal disbursement of Title IV Loan funds. Any action taken after a deadline, even a correction, is a violation of the deadline requirement. So, when an institution corrects a Return of Title IV Funds calculation, and, as a result, returns funds after the 45-day deadline, it is a late return. When the school makes a correction and notifies the student or parent later than 30 days after the date of the institution’s determination that the student withdrew of the need for authorization to make any loan Post-withdrawal disbursement of Title IV loan funds, the school has violated that deadline.
# Requirements and Deadlines

<table>
<thead>
<tr>
<th>Party Responsible</th>
<th>Requirement</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>School</td>
<td>Determining withdrawal date for student who withdraws without providing notification.</td>
<td>30 days after the end of the earlier of: Payment or enrollment period. Academic year in which student withdrew. Educational program from which student withdrew.</td>
</tr>
<tr>
<td>School</td>
<td>Return of unearned Title IV funds.</td>
<td>As soon as possible, but no later than 45 days after date school determined student withdrew.</td>
</tr>
<tr>
<td>School</td>
<td>Post-withdrawal disbursement to student’s account for: Outstanding current (allowable) charges (tuition fees, room and board, etc.). Minor (e.g., under $200) prior year charges that the school has authorization to retain.</td>
<td>As soon as possible, but no later than 180 days of date school determined student withdrew, in accordance with requirements for disbursing Title IV funds (34 CFR 668.164).</td>
</tr>
<tr>
<td>School</td>
<td>Written notification providing the student (or parent) the opportunity to accept all or part of a Post-withdrawal disbursement of Title IV loan funds, (Perkins, Direct Loan or PLUS) to the student’s account.</td>
<td>Within 30 days of the school’s determination that the student withdrew, (34 CFR 668.22(a)(5)(iii)(A)).</td>
</tr>
<tr>
<td>School</td>
<td>Written notification of student’s eligibility for a direct Post-withdrawal disbursement of Title IV loan funds in excess of outstanding current (educationally related) charges.</td>
<td>Within 30 days of the school’s determination that the student withdrew, (34 CFR 668.22(a)(5)(iii)(A)).</td>
</tr>
<tr>
<td>School</td>
<td>Post-withdrawal disbursement to student for earned Title IV funds in excess of outstanding current (educationally related) charges.</td>
<td>From the date school determined student withdrew (1) Loans as soon as possible, but no later than 180 days (2) Grants as soon as possible, but no later than 45 days.</td>
</tr>
<tr>
<td>School</td>
<td>Notification to student (or parent) of outcome of late request for a Post-withdrawal disbursement to student (request received by school after the specified period and school chooses not to make disbursement).</td>
<td>Not specified, but as soon as possible.</td>
</tr>
<tr>
<td>School</td>
<td>Notification to student of grant overpayment.</td>
<td>Within 30 days of date school determined student withdrew.</td>
</tr>
<tr>
<td>School</td>
<td>Referral of student to Collections, if student does not pay overpayment in full, does not enter into repayment agreement or fails to meet terms of repayment agreement.</td>
<td>Not specified, but as soon as possible.</td>
</tr>
<tr>
<td>Student (or parent)</td>
<td>Submit response instructing school to make Post-withdrawal disbursement.</td>
<td>Within specified number of days school allows for response.</td>
</tr>
<tr>
<td>Student</td>
<td>Return of unearned Title IV funds.</td>
<td>Loans – according to terms of the loan. Grants – within 45 days of earlier of date school sent, or was required to send notice.</td>
</tr>
</tbody>
</table>
### REQUIREMENTS AND DEADLINES Cont.

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<th>Party Responsible</th>
<th>Notification</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>School</td>
<td><strong>Report of student to NSLDS</strong> if student does not pay overpayment in full, does not enter into repayment agreement, or fails to meet terms of repayment agreement.**</td>
<td>No later than 45 days from the date student is notified of overpayment.</td>
</tr>
<tr>
<td>School</td>
<td><strong>Consumer Information.</strong></td>
<td>• School’s withdrawal policy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• School’s refund policy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Office(s) designated to receive official notifications of intent to withdraw.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Requirements regarding return of Title IV funds.</td>
</tr>
<tr>
<td>School</td>
<td><strong>Written notification of student’s eligibility for a direct Post-withdrawal disbursement of Title IV loan funds in excess of outstanding current (educationally related) charges.</strong></td>
<td>• Identify type and amount of the Title IV loan funds that will make up the Post-withdrawal disbursement not credited to student’s account.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Explain that student or parent may accept all or part of the disbursement.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Advise student or parent that no Post-withdrawal disbursement of Title IV loan funds will be made unless school receives response within the time-frame established by the school.</td>
</tr>
<tr>
<td>School</td>
<td><strong>Response (written or electronic) to late request for Post-withdrawal disbursement (that school chooses not to make).</strong></td>
<td>Outcome of request.</td>
</tr>
<tr>
<td>School</td>
<td><strong>Repayment Agreement.</strong></td>
<td>• Terms permitting student to repay overpayment while maintaining eligibility for Title IV funds.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Repayment in full within 2 years of date school determined student withdrew.</td>
</tr>
</tbody>
</table>
ROUNDING

For Dollar Amounts
In the calculation, round to the nearest penny using standard rounding rules. Final repayment amounts that the school or student are responsible for returning may be rounded to the nearest dollar, again using standard rounding rules.

For Percentages
Calculate to four decimal places, and rounded to three decimal places. The third decimal is rounded up if fourth decimal is 5 or above.

The one exception to the rounding rule happens when determining the percentage of Title IV program assistance earned. Students who withdraw at any point after the 60% point in the payment period or period of enrollment have earned 100% of their Title IV funds. If using standard rounding rules, a quotient of .6001 through .6004 would be rounded down to .600 (60%), and the student would not have earned 100% of Title IV funds. Therefore, for the purpose of determining whether a student has earned 100% of Title IV funds, amounts of .6001 through .6004 are not rounded – recognizing that students completing more than 60% of the period (by any amount) have earned 100% of their Federal Student Aid.
PAYMENT PERIOD VS. PERIOD OF ENROLLMENT

For students who withdraw from semester, trimester or quarter programs, a school must perform the Return calculation on a payment period basis. For students who withdraw from a nonstandard term-based or nonterm-based educational program, the school has the choice of performing the Return calculation on either basis. The institution must use the same basis (payment period or period of enrollment) in its calculations for all students within a program who cease attendance.

An exception is allowed for students who transfer to or reenter a school that offers nonterm-based or nonstandard term-based educational programs. For students who transfer to or reenter a nonterm-based or nonstandard term-based educational program a school may make a separate selection of payment period or period of enrollment to use in calculating their Return of Title IV funds for everyone within the group that transfers or reenters.

The periods used for transfer and reentry students do not have to be the same. A school may choose to use payment period for transfer students and period of enrollment for reentry students.

Payment Period
The definition of a payment period is the same as that used for other Title IV purposes. Schools that use payment periods as the basis for Return calculations should note that creating multiple disbursements within a payment period does not create a new or additional payment period.

Period of Enrollment
A period of enrollment is the academic period established by the school for which institutional charges are generally assessed (i.e., the length of the student’s program or the academic year, but consistent with the period for which loans generally are originated).
PAYMENT PERIOD
VS.
PERIOD OF ENROLLMENT

Changing the basis of the calculation

A school may change the basis for its Return calculations for new students as they begin classes. However, for continuing students, since the institution’s Return policy must be included in the published materials the school provides to students as part of the consumer information requirement, the school would have to change its catalogue, its written policies and procedures, and its enrollment agreements (if any), and allow sufficient time for those continuing students who would be governed by the new policy to receive and review the materials.
Case Study: TOM DRUMMER

Tom is majoring in Education at Barn-Hall University. He plans to teach Physics. His cost of attendance is $20,000 and his financial aid package for a semester at Barn-Hall University (BHU) is $6,300 from the following sources:

- $2,200 Federal Pell Grant
- $100 Barn-Hall University Grant
- $1,000 Federal Teach Grant
- $2,000 Direct Unsubsidized Loan (Net amount disbursed)
- $1,000 Federal Perkins Loan

All of Tom’s aid has been disbursed, so there isn't any aid remaining that could have been disbursed.

The semester is 124 calendar days from January 10th to May 13th.

There are 115 days in the period. Spring break was from March 14-18. **Where classes end on a Friday and do not resume until Monday following a one-week break, both weekends (four days) and the five weekdays would be excluded from the Return calculation (34 CFR 668.22(f)(2)(i)).** Therefore, 9 days are excluded from the calculation.

Tom withdrew January 25th and notified the school. He completed 16 calendar days.

Tom lives in a residence hall at school, which is located in a rural area. Tom’s books are only available at BHU’s bookstore.

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
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<tbody>
<tr>
<td>Tuition and fees</td>
<td>$3,200</td>
</tr>
<tr>
<td>Room</td>
<td>$1,250</td>
</tr>
<tr>
<td>Board</td>
<td>$1,000</td>
</tr>
<tr>
<td>Books and supplies</td>
<td>$500</td>
</tr>
</tbody>
</table>
R2T4 WORKSHEETS

Begin by completing the top section of the credit-hour R2T4 worksheet for Tom Drummer:
# STEP 1

Step 1 begins with the aid that has been disbursed to the student. For aid to be included in the Amount Disbursed column, the student must have been eligible to receive the funds and to have had the funds disbursed to him or her. It counts as aid disbursed if it is disbursed as of the date the institution’s determination that the student withdrew. Generally, a student’s Title IV funds are disbursed when a school credits the student’s account with the funds or pays the student or parent directly with:

- Title IV funds received from the Department, or
- Institutional funds used in advance of receiving Title IV program funds.

### STEP 1: Student’s Title IV Aid Information

<table>
<thead>
<tr>
<th>Title IV Grant Programs</th>
<th>Amount Disbursed</th>
<th>Amount that Could Have Been Disbursed</th>
<th>E. Total Title IV aid disbursed for the period</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Pell Grant</td>
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<tr>
<td>2. Academic Competitiveness Grant</td>
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<td>3. National SMART Grant</td>
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<tr>
<td>4. FSEOG</td>
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<td>5. TEACH Grant</td>
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<td>6. Iraq Afghanistan Service Grant</td>
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<tr>
<td><strong>A.</strong> Subtotal</td>
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</table>

<table>
<thead>
<tr>
<th>Title IV Loan Programs</th>
<th>Net Amount Disbursed</th>
<th>Net Amount that Could Have Been Disbursed</th>
<th>G. Total Title IV aid disbursed and that could have been disbursed for the period</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Unsubsidized FFEL/Direct Stafford Loan</td>
<td></td>
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<tr>
<td>8. Subsidized FFEL/Direct Stafford Loan</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>9. Perkins Loan</td>
<td></td>
<td></td>
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<tr>
<td>10. FFEL/Direct PLUS (Graduate Student)</td>
<td></td>
<td></td>
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<tr>
<td>11. FFEL/Direct PLUS (Parent)</td>
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<tr>
<td><strong>B.</strong> Subtotal</td>
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<tr>
<td><strong>C.</strong> Subtotal</td>
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</tbody>
</table>

\[ E = A + B \]

\[ G = F + C \]
TITLE IV AID THAT COULD HAVE BEEN DISBURSED

In order for a school to include in its Return calculation aid that could have been disbursed, the student had to have met the conditions for a late disbursement prior to the student becoming ineligible.

Any undisbursed Title IV aid for the period that the school uses as the basis for the Return calculation is counted as aid that could have been disbursed as long as the following conditions were met before the date the student became ineligible:

1. The Department processed a Student Aid Report (SAR) or Institutional Student Information Record (ISIR) with an official Expected Family Contribution (EFC) for the student;
2. For an FSEOG award, the institution made the award to the student;
3. For a Direct loan, the institution originated the loan;
4. For a Perkins Loan, the institution made the award to the student, and
5. For TEACH, the institution awarded the grant.

As described in DCL GEN-05-16, a promissory note must be signed for a loan to be included as Aid that could have been disbursed in a Return calculation. The signature may be obtained after the student withdraws, but for the loan to be included as aid that could have disbursed, the promissory note must be signed before the school performs the Return calculation.
STEP 2

INSTITUTIONS REQUIRED TO TAKE ATTENDANCE

Regulations published on October 29, 2010 changed the guidance regarding institutions required to take attendance. There are circumstances where the institution may not be required by an outside entity to take attendance, but would still be considered to be an institution required to take attendance.

Examples of this would include:

- The school requires faculty to take attendance for all students who are enrolled in a particular major. For students who are enrolled in that particular major and withdraw, the school would be considered required to take attendance.
- The school requires faculty to take attendance during the first two weeks of school, otherwise known at the school as the “add/drop” period. If a student withdraws during this “add/drop” period, the school is considered to be required to take attendance during that period only. If a student withdraws after the “add/drop” period in this example, the school would be considered an institution not required to take attendance.

DATE OF DETERMINATION AT INSTITUTIONS REQUIRED TO TAKE ATTENDANCE

Institutions that are required to take attendance are expected to have a procedure in place for routinely monitoring attendance records to determine in a timely manner when a student withdraws. Except in unusual circumstances, the date of the institution’s determination that the student withdrew should be no later than 14 days after the student’s last date of attendance as determined by the institution from its attendance records.

The institution is NOT required to administratively withdraw a student who has been absent for 14 days. However, after 14 days, it is expected to have determined whether the student intends to return to classes or to withdraw.
In addition, if the student is eventually determined to be a withdrawal, the end of the 14-day period begins the timeframe for completing a Return calculation.

This requirement does not affect a student’s withdrawal date. At an institution that is required to take attendance, a student’s withdrawal date is always the last date of attendance as determined by the institution from its attendance records.

**COUNTING CALENDAR DAYS IN CREDIT HOUR PROGRAMS**

School A has Spring Break from April 4 – 8, and the school doesn’t offer weekend classes. Therefore, it would be 9 consecutive days of a scheduled break, because the previous weekend and the following weekend would be included in counting the calendar days.

<table>
<thead>
<tr>
<th>Sun</th>
<th>Mon</th>
<th>Tue</th>
<th>Wed</th>
<th>Thu</th>
<th>Fri</th>
<th>Sat</th>
</tr>
</thead>
<tbody>
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<td>2</td>
<td>COUNT WEEKEND</td>
</tr>
<tr>
<td>3</td>
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<td>5</td>
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<td>COUNT WEEKEND</td>
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<td>25</td>
<td>26</td>
<td>27</td>
<td>28</td>
<td>29</td>
</tr>
</tbody>
</table>
COUNTING CALENDAR DAYS IN CREDIT HOUR PROGRAMS  Cont.

School B finishes with classes on the Tuesday prior to the Thanksgiving holiday. They resume classes the following Monday. They have a scheduled break of 5 days – Wednesday, Thursday, Friday, Saturday and Sunday.

<table>
<thead>
<tr>
<th></th>
<th>Sun</th>
<th>Mon</th>
<th>Tue</th>
<th>Wed</th>
<th>Thu</th>
<th>Fri</th>
<th>Sat</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>3-4</td>
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<td>5-6</td>
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<td>7-12</td>
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<td>13-19</td>
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<tr>
<td>20-21</td>
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</tr>
<tr>
<td>22</td>
<td></td>
<td></td>
<td>CLASSES</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23-26</td>
<td></td>
<td></td>
<td>HOLIDAY</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>27-28</td>
<td>HOLIDAY</td>
<td></td>
<td>CLASSES</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>29-30</td>
<td>Notes:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

November
COUNTING CALENDAR DAYS IN CREDIT HOUR PROGRAMS  Cont.

Modular Program Example. Each block represents a 3 week module as part of a 12 week program

Module A 3 weeks
Module B 3 weeks
Module C 3 weeks Never Enrolled in Module C
Module D 3 weeks

Is an R2T4 Calc required in these examples?

EXAMPLE 1
Module A 3 weeks
Module B 3 weeks Withdraw
Module C 3 weeks Never Enrolled in Module C
Module D 3 weeks Registered but did not attend

Withdrew at midpoint of Module B. Student failed to begin attendance in a course scheduled to attend-Module D. Student never attended Module D. R2T4 would be required.

EXAMPLE 2
Module A 3 weeks
Module B 3 weeks Withdraw
Module C 3 weeks Never Enrolled in Module C
Module D 3 weeks Confirmed & Completes Module D

Student provides written confirmation. R2T4 not required since he confirmed and completed Module D.

EXAMPLE 3
Module A 3 weeks
Module B 3 weeks Withdraw
Module C 3 weeks Never Enrolled in Module C
Module D 3 weeks Does not show up

Student provides written confirmation to attend Module D. However, student never attends. R2T4 required using the withdrawal date from Module B.

EXAMPLE 4
Module A 3 weeks
Module B 3 weeks Withdraw
Module C 3 weeks Never Enrolled in Module C
Module D 3 weeks Withdraws after beginning Mod D

Student provides written confirmation. But, student withdraws after beginning Module D. An R2T4 calculation will be required using the withdrawal date from Module D.
**STEP 2 CREDIT HOURS**

Note: When determining the percentage of payment period or period of enrollment completed, the student MUST have completed MORE than 60% to have earned 100% of his or her Title IV aid. .5999 is not greater than .6000, even with rounding up.
STEP 2 CLOCK HOURS

STEP 2: Percentage of Title IV Aid Earned

Withdrawal date

H. Determine the percentage of the period completed:
Divide the clock hours scheduled to have been completed as of the withdrawal date in the period by the total clock hours in the period.

Hours scheduled to complete ÷ Total hours in period = .

If this percentage is greater than 60%, enter 100% in Box H and proceed to Step 3.
If this percentage is less than or equal to 60%, enter that percentage in Box H and proceed to Step 3.
CHECKPOINT #2

Circle Correct Answer

1. Date of Determination will _____________________
   (always/never/sometimes) be the same as the student’s withdrawal date.

2. Our official withdrawal policy is
   _____________________ (secret/available upon request/widely published as consumer information).

3. Our school is _________________________
   (required/not required) to complete an R2T4 calculation for a student that withdraws after the 60% point
   in the payment period.
**STEP 3**

**STEP 3: Amount of Title IV Aid Earned by the Student**

Multiply the percentage of Title IV aid earned (Box H) by the Total Title IV aid disbursed and that could have been disbursed for the period (Box G).

\[
\% \times \text{Box G} = \text{I. } $ .
\]

**STEP 4**

**STEP 4: Title IV Aid to be Disbursed or Returned**

- If the amount in Box I is greater than the amount in Box E, go to Item J (Post-withdrawal disbursement).
- If the amount in Box I is less than the amount in Box E, go to Title IV aid to be returned (Item K).
- If the amounts in Box I and Box E are equal, **STOP**. No further action is necessary.

**J. Post-withdrawal disbursement**

From the Amount of Title IV aid earned by the student (Box I) subtract the Total Title IV aid disbursed for the period (Box E). This is the amount of the post-withdrawal disbursement.

\[
\text{Box I} - \text{Box E} = \text{J. } $ .
\]

_stop here, and enter the amount in “J” in Box 1 on Page 3 (Post-withdrawal disbursement tracking sheet).**
STEP 4 Cont.

**K. Title IV aid to be returned**

From the Total Title IV aid disbursed for the period (Box E) subtract the amount of Title IV aid earned by the student (Box I). This is the amount of Title IV aid that must be returned.

\[
\text{Box } E - \text{Box } I = K. \$
\]

---

**STEP 5: Amount of Unearned Title IV Aid Due from the School**

**L. Institutional charges for the period**

<table>
<thead>
<tr>
<th>Tuition</th>
<th>Room</th>
<th>Board</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Total Institutional Charges

\[
(\text{Add all the charges together}) = L. \$
\]

**M. Percentage of unearned Title IV aid**

\[
100\% - \text{Box } H\% = M. \%\]

**N. Amount of unearned charges**

Multiply institutional charges for the period (Box L) by the percentage of unearned Title IV aid (Box M).

\[
\text{Box } L \times \text{Box } M\% = N. \$
\]

**O. Amount for school to return**

Compare the amount of Title IV aid to be returned (Box K) to amount of unearned charges (Box N), and enter the lesser amount. 

\[
O. \$
\]
INSTITUTIONAL CHARGES

Three principles associated with institutional charges

Published in a January 7, 1999 policy bulletin, these principles are applicable to determining institutional charges.

Principle 1: Most costs charged by the school are institutional charges

The most important principle to keep in mind is that all tuition, fees, room and board, and other educationally related charges a school assesses a student are institutional charges, unless demonstrated otherwise. If you want to exclude specific charges or costs from a calculation, you must document that the charges are not institutional charges.

Principle 2: An institutional charge does not need to be assessed to all students

A charge assessed to all students enrolled in a course or program is an institutional charge whether or not it is assessed to all students at the school. Moreover, a charge does not have to be specified in a student’s enrollment agreement to be considered an institutional charge.

Principle 3: Charges on a student’s account are not always school charges; school charges do not always appear on a student’s account

With the student’s authorization, a school may credit a student’s account with Title IV funds to pay for non-institutional charges. If a student withdraws from the school with debits for non-institutional charges on his or her account, the school should exclude those charges from the Return calculation.

Conversely, there may be institutional charges that do not appear on a student’s account. If a school disburses Title IV funds to a student to buy required books, equipment, supplies, or materials and the student does not have a real and reasonable opportunity to purchase them from another source, those costs must be classified as institutional charges.
DEMONSTRATING A REAL AND REASONABLE OPPORTUNITY

A school may treat charges for books, supplies, equipment, and materials as non-institutional charges if the school can substantiate that its students have the option of obtaining the required course materials from an alternative source. The school must be able to document that: (1) the required course materials were available for purchase at a relatively convenient location unaffiliated with the school; and (2) the school provided financial aid funds in a way and at a time that made it possible for the student to purchase the materials in a timely manner. A signed statement by a student that he or she had the option to purchase the materials from an alternative source is not sufficient documentation.

Book vouchers and institutional charges in the return of Title IV funds calculations

If a book voucher issued by a school cannot be used to purchase course materials from a convenient unaffiliated source, the student does not have a real and reasonable opportunity to purchase his or her course materials elsewhere. In that case the school must include the cost of books and materials purchased with the voucher as institutional charges in Step 5, Part L of the Return calculation.

WHEN TO PRORATE INSTITUTIONAL CHARGES

When a school chooses to calculate the treatment of Title IV, HEA program assistance on a payment period basis for a non-term credit-hour or clock-hour program, but the school charges for a period longer than the payment period (most likely the period of enrollment) there may not be a specific amount that reflects the actual institutional charges incurred by the student for the payment period.

When a student is charged for a period longer than a payment period, the institutional charges incurred by the student for the payment period generally are a prorated amount of institutional charges for the longer period.
WHEN TO PRORATE INSTITUTIONAL CHARGES Cont.

However, if a school has retained Federal Student Aid funds in excess of the pro-rated amount to cover institutional charges, then the institutional charges for the payment period are the amount retained.

A school that charges by the period of enrollment but performs its Return calculation on a payment period basis before entering data in STEP 5, Part L, of the Return calculation, must determine whether it should enter: (a) the pro-rated amount of all institutional charges, or (b) the amount the school retained. To do this, first, the school prorates all institutional charges. Then, the school determines the amount actually retained. The school compares the two results and enters in STEP 5, Part L the greater of the two amounts.

For example, institutional charges are $8,000 for a nonterm based program that spans two payment periods of 450 clock hours each. The school chooses to calculate the treatment of Federal Student Aid funds on a payment period basis. A student withdraws in the first payment period. The prorated amount of institutional charges for each payment period is $4,000. However, the school has retained $5,000 of the Federal Student Aid funds for institutional charges [$4,000 for the prorated portion of the tuition and $1,000 for books and supplies for the entire period of enrollment] for the payment period. Therefore, the institutional charges the school must use in the Return calculation for the payment period are $5,000.
CHECKPOINT #3
Circle either True or False

1. T/F – Institutional charges always include tuition, fees, room and board.
2. T/F – A student is due a post-withdrawal disbursement when he/she earned less aid than was disbursed.
3. T/F – A school will not be required to return more than the total amount of aid to be returned.

STEP 6
ORDER OF RETURN OF FUNDS

- Unsubsidized Stafford Loans
- Subsidized Stafford Loans
- Perkins Loan
- Direct PLUS (Grad PLUS)
- Direct PLUS (Parent PLUS)
- Pell Grant
- Academic Competitiveness Grant (ACG)*
- National SMART Grant*
- Federal Supplemental Opportunity Grant (FSEOG)
- Iraq/Afghanistan Service Grant

*After July 1, 2011, there should be no new ACG or SMART grants awarded. These Title IV programs were eliminated effective July 1, 2011.
## STEP 6

### STEP 6: Return of Funds by the School

The school must return the unearned aid for which the school is responsible (Box O) by repaying funds to the following sources, in order, up to the total net amount disbursed from each source.

#### Title IV Programs

<table>
<thead>
<tr>
<th>Program</th>
<th>Amount for School to Return</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Unsubsidized FFEL/Direct Stafford Loan</td>
<td></td>
</tr>
<tr>
<td>2. Subsidized FFEL/Direct Stafford Loan</td>
<td></td>
</tr>
<tr>
<td>3. Perkins Loan</td>
<td></td>
</tr>
<tr>
<td>4. FFEL/Direct PLUS (Graduate Student)</td>
<td></td>
</tr>
<tr>
<td>5. FFEL/Direct PLUS (Parent)</td>
<td></td>
</tr>
</tbody>
</table>

\[
\text{Total loans the school must return} = P.\$ \cdot
\]

<table>
<thead>
<tr>
<th>Program</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Pell Grant</td>
<td></td>
</tr>
<tr>
<td>7. Academic Competitiveness Grant</td>
<td></td>
</tr>
<tr>
<td>8. National SMART Grant</td>
<td></td>
</tr>
<tr>
<td>9. FSEOG</td>
<td></td>
</tr>
<tr>
<td>10. TEACH Grant</td>
<td></td>
</tr>
<tr>
<td>11. Iraq Afghanistan Service Grant</td>
<td></td>
</tr>
</tbody>
</table>
A school must return 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.

A school will be considered to have returned funds timely if the school does one of the following as soon as possible, but no later than 45 days after the date it determines that the student withdrew:

- deposits or transfers the funds into the school’s federal funds bank account;
- initiates an electronic funds transfer (EFT) to an account belonging to the student;
- initiates an electronic transaction that informs the FFEL lender or ED, in the case of a Direct Loan, to adjust the borrower’s loan account for the amount returned; or
- issues a check.

Schools must return any amount of Title IV funds to the applicable program(s).

**STEP 7**

![STEP 7: Initial Amount of Unearned Title IV Aid Due from the Student](image)

From the amount of Title IV aid to be returned (Box K) subtract the Amount for the school to return (Box O).

\[ \text{Box K} - \text{Box O} = Q. \]

*If Box Q is \( \leq \) zero, STOP. If greater than zero, go to Step 8*
### STEP 8

**STEP 8: Repayment of the Student’s loans**

From the Net loans disbursed to the student (Box B) subtract the Total loans the school must return (Box P) to find the amount of Title IV loans the student is still responsible for repaying (Box R).

These loans consist of loans the student has earned, or unearned loan funds the school is not responsible for repaying. They are repaid to the loan holders according to the terms of the borrower’s promissory note.

\[
\text{Box B} - \text{Box P} = R.\$
\]

- If Box Q is less than or equal to Box R, **STOP**. The only action a school must take is to notify the holders of the loans of the student’s withdrawal date.
- If Box Q is greater than Box R, proceed to Step 9.

### STEP 9

For withdrawals occurring on or after July 1, 2006, the regulations limit the amount a student must repay to the amount by which the original overpayment amount exceeds 50 percent of the total grant funds **disbursed or could have been disbursed** by the student for the payment period or period of enrollment.
A student does not have to repay an **original** grant overpayment of $50 or less for grant overpayments resulting from the student’s withdrawal. As a result, an **original** grant overpayment of $50 or less will not make the student ineligible to receive Title IV, HEA program assistance should the student return to school. A school is not required to attempt recovery of that overpayment, report it to the Department’s National Student Loan Data System (NSLDS), or refer it to Federal Student Aid’s Debt Resolution Services.

**Amounts of $50 or less are considered de minimus.** These *de minimus* amounts are program specific. That is, if a Return calculation resulted in a student having to return $150 in Pell funds and $40 in FSEOG funds, the student would have to return the Pell funds, but the FSEOG funds would be considered *de minimus* and treated as described above.
STEP 10

STEP 10: Return of Grant Funds by the Student

Except as noted below, the student must return the unearned grant funds for which he or she is responsible (Box U). The grant funds returned by the student are applied in order as indicated, up to the amount disbursed from that grant program minus any grant funds the school is responsible for returning to that program in Step 6.

Note that the student is not responsible for returning funds to any program to which the student owes $50.00 or less.

Title IV Grant Programs

1. Pell Grant
2. Academic Competitiveness Grant
3. National SMART Grant
4. FSEOG
5. TEACH Grant
6. Iraq Afghanistan Service Grant

Amount To Return
SCHOOL’S RESPONSIBILITIES IN RETURN OF FUNDS BY THE STUDENT

Grant Overpayments

Students who owe overpayments as a result of withdrawals initially will retain their eligibility for Title IV funds for a maximum of 45 days from the earlier of the –

- date the school sends the student notice of the overpayment, or
- date the school was required to notify the student of the overpayment.

Within 30 days of determining that a student who withdrew must repay all or part of a Title IV grant, a school must notify the student that he or she must repay the overpayment or make satisfactory arrangements to repay it. In its notification a school must inform the student that:

1. The student owes an overpayment of Title IV funds.
2. The student’s eligibility for additional Title IV funds will end if the student fails to take positive action by the 45th day following the date the school sent or was required to send notification to the student.
3. There are three positive actions a student can take to extend his or her eligibility for Title IV funds beyond 45 days:
   a. The student may repay the overpayment in full to the school.
   b. The student may sign a repayment agreement with the school. (Note: Two years is the maximum time a school may allow for repayment).
   c. The student may sign a repayment agreement with the Department. If the student takes no positive action during the 45-day period, the school should report the overpayment to NSLDS immediately after the 45-day period has elapsed. (Because making this change in the NSLDS system is a simple process, we expect an institution will complete making the change within a few days of the end of the 45-day period).
4. If the student fails to take one of the positive actions during the 45-day period, the student’s overpayment immediately must be reported to the NSLDS and referred to the Debt Resolution Services for collection.
5. The student should contact the school to discuss his or her options.
The 45-day period of extended eligibility

Students who owe overpayments as a result of withdrawals generally will retain their eligibility for Title IV funds for a maximum of 45 days from the earlier of (a) the date the school sends the student notice of the overpayment, or (b) the date the school was required to notify the student of the overpayment.

A student who receives Title IV funds within that period of extended eligibility and then fails to return the overpayment or make repayment arrangements becomes ineligible for additional Title IV program funds on the day following the 45-day period. However, any Title IV program funds received by the student during the 45-day period were received while the student was eligible. Therefore, those Title IV funds do not have to be returned (unless the student withdraws a second time). A student who loses his or her eligibility for Title IV funds at the expiration of the 45-day period will remain ineligible for additional Title IV funds until the student enters into a repayment agreement with the Department.

If at any time a student who previously negotiated a repayment arrangement fails to comply with the terms of his or her agreement to repay, that student immediately becomes ineligible for additional Title IV funds. Any Title IV program funds received by the student between the time the student negotiated the repayment arrangement and the time the student violated the agreement were received while the student was eligible. Therefore, those Title IV funds do not have to be returned (unless the student withdraws a second time). A student who violates the terms of a repayment agreement and loses eligibility remains ineligible for Title IV funds until the student has made satisfactory repayment arrangements with the Depart-
CHECKPOINT #4

Circle one.

- If Tom owed an Overpayment (Return of Grant funds) and doesn’t return the funds within 45 days, he will never again be eligible for Title IV aid. True? False?

- What would happen if Tom did not respond to the school's notification concerning his post-withdrawal disbursement until three weeks after he received the letter – and he wants his money? Can the school disburse the funds to him? Yes? No?

- If Tom received additional funds during the 45 day period of extended eligibility and then fails to return the overpayment, does he have to return those funds he received during this period? Yes? No?
POST-WITHDRAWAL DISBURSEMENTS

Schools may use the Post-withdrawal Disbursement Tracking Sheet to track the handling of post-withdrawal disbursements, or they may use a form developed by someone other than ED. Regardless of what form or mechanism is used, schools must maintain written records of their post-withdrawal disbursements.

Post-withdrawal Disbursements

CFR 34
668.22(a)(5)
APPENDIX A

Treatment Of Title IV Funds When A Student Withdraws From A Credit-Hour Program

Student’s Name ___________________________ Social Security Number ___________________________
Date form completed / / Date of school’s determination that student withdrew / /
Period used for calculation (check one) □ Payment period □ Period of enrollment

Monetary amounts should be in dollars and cents (rounded to the nearest penny). When calculating percentages, round to three decimal places. (For example, .4486 = .449, or 44.9%)

<table>
<thead>
<tr>
<th>STEP 1: Student’s Title IV Aid Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title IV Grant Programs</td>
</tr>
<tr>
<td>1. Pell Grant</td>
</tr>
<tr>
<td>2. Academic Competitiveness Grant</td>
</tr>
<tr>
<td>3. National SMART Grant</td>
</tr>
<tr>
<td>4. FSEOG</td>
</tr>
<tr>
<td>5. TEACH Grant</td>
</tr>
<tr>
<td>6. Iraq Afghanistan Service Grant</td>
</tr>
<tr>
<td>Amount Disbursed</td>
</tr>
<tr>
<td>Amount that Could Have Been Disbursed</td>
</tr>
</tbody>
</table>

| E. Total Title IV aid disbursed for the period |
| A.                                 |
| + B.                               |
| = E. $ .                          |

| F. Total Title IV grant aid disbursed and that could have been disbursed for the period |
| A.                                 |
| + B.                               |
| = F. $ .                          |

| G. Total Title IV aid disbursed and that could have been disbursed for the period |
| A.                                 |
| + B.                               |
| + C.                               |
| + D.                               |
| = G. $ .                          |

<table>
<thead>
<tr>
<th>STEP 2: Percentage of Title IV Aid Earned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Start date / / Scheduled end date / / Date of withdrawal / /</td>
</tr>
</tbody>
</table>

A school that is required to take attendance may, for a student who withdraws without notification, enter 50% in Box H and proceed to Step 3. Or, the school may enter the last date of attendance at an academically related activity for the “withdrawal date,” and proceed with the calculation as instructed. For a student who officially withdraws, enter the withdrawal date.

<table>
<thead>
<tr>
<th>H. Percentage of payment period or period of enrollment completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Divide the calendar days completed in the period by the total calendar days in the period (excluding scheduled breaks of five days or more AND days that the student was on an approved leave of absence).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Completed days</th>
<th>Total days</th>
</tr>
</thead>
</table>

| I. $ . |

<table>
<thead>
<tr>
<th>STEP 3: Amount of Title IV Aid Earned by the Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multiply the percentage of Title IV aid earned (Box H) by the Total Title IV aid disbursed and that could have been disbursed for the period (Box G).</td>
</tr>
</tbody>
</table>

| % X | I. $ . |

<table>
<thead>
<tr>
<th>STEP 4: Title IV Aid to be Disbursed or Returned</th>
</tr>
</thead>
<tbody>
<tr>
<td>If the amount in Box I is greater than the amount in Box E, go to Item J (Post-withdrawal disbursement).</td>
</tr>
<tr>
<td>If the amount in Box I is less than the amount in Box E, go to Title IV aid to be returned (Item K).</td>
</tr>
<tr>
<td>If the amounts in Box I and Box E are equal. STOP. No further action is necessary.</td>
</tr>
<tr>
<td>J. Post-withdrawal disbursement</td>
</tr>
<tr>
<td>From the Amount of Title IV aid earned by the student (Box I) subtract the Total Title IV aid disbursed for the period (Box E). This is the amount of the post-withdrawal disbursement.</td>
</tr>
</tbody>
</table>

| J. $ . |

You should use this form when the withdrawal date is on or after 7/1/2010.
## APPENDIX A Cont.

<table>
<thead>
<tr>
<th>Student's Name</th>
<th>Social Security Number</th>
</tr>
</thead>
</table>

### STEP 4: Aid to be Disbursed or Returned CONTINUED

<table>
<thead>
<tr>
<th>K. Title IV aid to be returned</th>
</tr>
</thead>
<tbody>
<tr>
<td>From the Total Title IV aid disbursed for the period (Box E) subtract the amount of Title IV aid earned by the student (Box I). This is the amount of Title IV aid that must be returned.</td>
</tr>
<tr>
<td>Box E</td>
</tr>
</tbody>
</table>

### STEP 5: Amount of Unearned Title IV Aid Due from the School

<table>
<thead>
<tr>
<th>L. Institutional charges for the period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuition</td>
</tr>
<tr>
<td>Total Institutional Charges</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>M. Percentage of unearned Title IV aid</th>
</tr>
</thead>
<tbody>
<tr>
<td>( 100% - \frac{\text{Box H}}{%} = M. % )</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>N. Amount of unearned charges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multiply institutional charges for the period (Box L) by the percentage of unearned Title IV aid (Box M).</td>
</tr>
<tr>
<td>( \frac{\text{Box L}}{%} \times N. $ )</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>O. Amount for school to return</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compare the amount of Title IV aid to be returned (Box K) to amount of unearned charges (Box N), and enter the lesser amount</td>
</tr>
<tr>
<td>O. $</td>
</tr>
</tbody>
</table>

### STEP 6: Return of Funds by the School

The school must return the unearned aid for which the school is responsible (Box O) by repaying funds to the following sources, in order, up to the total net amount disbursed from each source:

<table>
<thead>
<tr>
<th>Title IV Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Unsubsidized FFEL/Direct Stafford Loan</td>
</tr>
<tr>
<td>2. Subsidized FFEL/Direct Stafford Loan</td>
</tr>
<tr>
<td>3. Perkins Loan</td>
</tr>
<tr>
<td>4. FFEL/Direct PLUS (Graduate Student)</td>
</tr>
<tr>
<td>5. FFEL/Direct PLUS (Parent)</td>
</tr>
<tr>
<td>Total loans the school must return</td>
</tr>
<tr>
<td>6. Pell Grant</td>
</tr>
<tr>
<td>7. Academic Competitiveness Grant</td>
</tr>
<tr>
<td>8. National SMART Grant</td>
</tr>
<tr>
<td>9. FSEOG</td>
</tr>
<tr>
<td>10. TEACH Grant</td>
</tr>
<tr>
<td>11. Iraq Afghanistan Service Grant</td>
</tr>
</tbody>
</table>

### STEP 7: Initial Amount of Unearned Title IV Aid Due from the Student

| From the amount of Title IV aid to be returned (Box K) subtract the amount for the school to return (Box O), |
| \( = Q. \) |

### STEP 8: Repayment of the Student’s loans

| From the Net loans disbursed to the student (Box B) subtract the Total loans the school must return (Box P) to find the amount of Title IV loans the student is still responsible for repaying (Box R). |
| These loans consist of loans the student has earned, or unearned loan funds the school is not responsible for repaying. They are repaid to the loan holders according to the terms of the borrower’s promissory note. |
| \( = R. \$ \) |

### STEP 9: Grant Funds to be Returned

| S. Initial amount of Title IV grants for student to return |
| From the initial amount of unearned Title IV aid due from the student (Box Q) subtract the amount of loans to be repaid by the student (Box R), |
| \( = S. \$ \) |

### STEP 10: Return of Grant Funds by the Student

| T. Amount of Title IV grant protection |
| Multiply the total of Title IV grant aid that was disbursed and that could have been disbursed for the period (Box F) by 50%. |
| \( \times 50\% = T. \$ \) |

| U. Title IV grant funds for student to return |
| From the Initial amount of Title IV grants for student to return (Box S) subtract the Amount of Title IV grant protection (Box T), |
| \( = U. \$ \) |

| V. Return of Grant Funds by the Student |
| Except as noted below, the student must return the unearned grant funds for which he or she is responsible (Box U). The grant funds returned by the student are applied in order as indicated, up to the amount disbursed from that grant program minus any grant funds the school is responsible for returning to that program in Step 6. |

Note that the student is not responsible for returning funds to any program to which the student owes $50.00 or less.

<table>
<thead>
<tr>
<th>Title IV Grant Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Pell Grant</td>
</tr>
<tr>
<td>2. Academic Competitiveness Grant</td>
</tr>
<tr>
<td>3. National SMART Grant</td>
</tr>
<tr>
<td>4. FSEOG</td>
</tr>
<tr>
<td>5. TEACH Grant</td>
</tr>
<tr>
<td>6. Iraq Afghanistan Service Grant</td>
</tr>
</tbody>
</table>

---

You should use this form when the withdrawal date is on or after 7/1/2010.
# APPENDIX B

## Treatment Of Title IV Funds When A Student Withdraws From A Clock-Hour Program

<table>
<thead>
<tr>
<th>Title IV Grant Programs</th>
<th>Amount Disbursed</th>
<th>Amount that Could Have Been Disbursed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Pell Grant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Academic Competitiveness Grant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. National SMART Grant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. FSEOG</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. TEACH Grant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Iraq Afghanistan Service Grant</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Subtotal

<table>
<thead>
<tr>
<th>Title IV Loan Programs</th>
<th>Net Amount Disbursed</th>
<th>Net Amount that Could Have Been Disbursed</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Unsubsidized FFEL/Direct Stafford Loan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Subsidized FFEL/Direct Stafford Loan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Perkins Loan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. FFEL/Direct PLUS (Graduate Student)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Subtotal

### STEP 1: Student’s Title IV Aid Information

A. 

B. 

C. 

D. 

E. Total Title IV aid disbursed for the period. 

F. Total Title IV grant aid disbursed and that could have been disbursed for the period. 

G. Total Title IV aid disbursed and that could have been disbursed for the period. 

### STEP 2: Percentage of Title IV Aid Earned

- **Withdrawal date**

H. Determine the percentage of the period completed:

Divide the clock hours scheduled to have been completed as of the withdrawal date in the period by the total clock hours in the period.

\[
\text{Withdrawal date} = / / / \\
\text{Hours scheduled to complete} + \text{Total hours in period} = . \%
\]

- **Percentage of the period completed**

I. If this percentage is greater than 60%, enter 100% in Box H and proceed to Step 3.

J. If this percentage is less than or equal to 50%, enter that percentage in Box H, and proceed to Step 3.

\[
\text{Box H} = . \%
\]

### STEP 3: Amount of Title IV Aid Earned by the Student

Multiply the percentage of Title IV aid earned (Box H) by the Total Title IV aid disbursed and that could have been disbursed for the period (Box G).

\[
\text{Box G} \times \% = \text{I.}\$
\]

### STEP 4: Title IV Aid to be Disbursed or Returned

- **Post-withdrawal disbursement**

From the Amount of Title IV aid earned by the student (Box I) subtract the Total Title IV aid disbursed for the period (Box E). This is the amount of the post-withdrawal disbursement.

\[
\text{Box E} - \text{Box I} = \text{J.}\$
\]

- **Title IV aid to be returned**

From the Total Title IV aid disbursed for the period (Box E) subtract the Amount of Title IV aid earned by the student (Box I). This is the amount of Title IV aid that must be returned.

\[
\text{Box E} - \text{Box I} = \text{K.}\$
\]
### APPENDIX B Cont.

#### STEP 5: Amount of Unearned Title IV Aid Due from the School

<table>
<thead>
<tr>
<th>L. Institutional charges for the period</th>
<th>Tuition</th>
<th>Room</th>
<th>Board</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total Institutional Charges (Add all the charges together) = L.$

M. Percentage of unearned Title IV aid = \( \frac{100\% - \text{Box } H}{\text{Box } M} \) \% = M.$

N. Amount of unearned charges

Multiply institutional charges for the period (Box L) by the Percentage of unearned Title IV aid (Box M).

\[ \frac{\text{Box } L}{\text{Box } M} \times \% = N.$ \]

O. Amount for school to return

Compare the amount of Title IV aid to be returned (Box K) to Amount of unearned charges (Box N), and enter the lesser amount.

O.$

#### STEP 6: Return of Funds by the School

The school must return the unearned aid for which the school is responsible (Box O) by repaying funds to the following sources, in order, up to the total net amount disbursed from each source.

**Title IV Programs**

1. Unsubsidized FFEL/Direct Stafford Loan
2. Subsidized FFEL/Direct Stafford Loan
3. Perkins Loan
4. FFEL/Direct PLUS (Graduate Student)
5. FFEL/Direct PLUS (Parent)
6. Pell Grant
7. Academic Competitiveness Grant
8. National SMART Grant
9. FSEOG
10. TEACH Grant
11. Iraq Afghanistan Service Grant

Total loans the school must return = P.$

#### STEP 7: Initial Amount of Unearned Title IV Aid Due from the Student

From the amount of Title IV aid to be returned (Box K) subtract the Amount for the school to return (Box O).

\[ \frac{\text{Box } K}{\text{Box } O} = Q.$ \]

If Box O is ≤ zero, STOP. If greater than zero, go to Step 8.

#### STEP 8: Repayment of the Student’s loans

From the Net loans disbursed to the student (Box B) subtract the Total loans the school must return (Box P) to find the amount of Title IV loans the student is still responsible for repaying (Box R).

These loans consist of loans the student has earned, or unearned loan funds the school is not responsible for repaying. They are repaid to the loan holders according to the terms of the borrower’s promissory note.

\[ \frac{\text{Box } B}{\text{Box } P} = R.$ \]

- If Box Q is less than or equal to Box R, STOP.
- The only action a school must take is to notify the holders of the loans of the student’s withdrawal date.
- If Box Q is greater than Box R, proceed to Step 9.

#### STEP 9: Grant Funds to be Returned

S. Initial amount of Title IV grants for student to return

From the Initial amount of unearned Title IV aid due from the student (Box O) subtract the amount of loans to be repaid by the student (Box R).

\[ \frac{\text{Box } Q}{\text{Box } R} = S.$ \]

T. Amount of Title IV grant protection

Multiply the total of Title IV grant aid that was disbursed and that could have been disbursed for the period (Box F) by 50%.

\[ \frac{\text{Box } F}{50\%} = T.$ \]

U. Title IV grant funds for student to return

From the Initial amount of Title IV grants for student to return (Box S) subtract the Amount of Title IV grant protection (Box T).

\[ \frac{\text{Box } S}{\text{Box } T} = U.$ \]

- If Box U is less than or equal to zero, STOP. If not, go to Step 10.

#### STEP 10: Return of Grant Funds by the Student

Except as noted below, the student must return the unearned grant funds for which he or she is responsible (Box U). The grant funds returned by the student are applied in order as indicated, up to the amount disbursed from that grant program minus any grant funds the school is responsible for returning to that program in Step 6.

**Title IV Grant Programs**

1. Pell Grant
2. Academic Competitiveness Grant
3. National SMART Grant
4. FSEOG
5. TEACH Grant
6. Iraq Afghanistan Service Grant

Note that the student is not responsible for returning funds to any program to which the student owes $50.00 or less.

You should use this form when the withdrawal date is on or after 7/1/2010.
**APPENDIX C**

**POST-WITHDRAWAL DISBURSEMENT TRACKING SHEET**

<table>
<thead>
<tr>
<th>Students Name</th>
<th>Social Security Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Date of school’s determination that student withdrew**

/ / /

**I. Amount of Post-withdrawal Disbursement (PWD)**

Amount from “Box J” of the Treatment of Title IV Funds When a Student Withdraws worksheet

Box 1 $ .

**II. Outstanding Charges For Educationally Related Expenses Remaining On Student’s Account**

Total Outstanding Charges Scheduled to be Paid from PWD

(Note: Prior-year charges cannot exceed $200.)

Box 2 $ .

**III. Post-withdrawal Disbursement Offered Directly to Student and/or Parent**

From the total Post-withdrawal Disbursement due (Box 1), subtract the Post-withdrawal Disbursement to be credited to the student’s account (Box 2). This is the amount you must make to the student (grant) or offer to the student or parent (Loan) as a Direct Disbursement.

$ . - $ . = Box 3 $ .

**IV. Allocation of Post-withdrawal Disbursement**

<table>
<thead>
<tr>
<th>Type of Aid</th>
<th>Loan Amount School Seeks to Credit to Account</th>
<th>Loan Amount Authorized to Credit to Account</th>
<th>Title IV Aid Credited to Account</th>
<th>Loan Amount Offered as Direct Disbursement</th>
<th>Loan Amount Accepted as Direct Disbursement</th>
<th>Title IV Aid Disbursed Directly to Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pell Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>ACG</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>National SMART Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>FSEOG</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>TEACH Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Iraq Afghanistan Svc. Grant</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Perkins</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Subsidized FFEL / Direct</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Unsubsidized FFEL / Direct</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>FFEL / Direct Grad Plus</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>FFEL / Direct Parent Plus</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**V. Authorizations and Notifications**

Post withdrawal disbursement loan notification sent to student and/or parent on / / /

Deadline for student and/or parent to respond / / /

☐ Response received from student and/or parent on / / /

☐ Response not received

☐ School does not accept late response

**VI. Date Funds Sent**

Date Direct Disbursement mailed or transferred Grant / / / Loan / / /

You should use this form when the withdrawal date is on or after 7/1/2010
APPENDIX D

Box Codes for Return to Title IV Funds

A  Amount Disbursed for Title IV Grant Programs
B  Net Amount Disbursed for Title IV Loan Programs
C  Amount in Grants that Could Have Been Disbursed
D  Net Amount in Loans that Could Have Been Disbursed
E  Total Aid Disbursed for the period
F  Total Grant Aid that Was Disbursed and Could Have Been Disbursed
G  Total Title IV Aid that Was Disbursed and Could Have Been Disbursed
H  Percentage of Payment Period student had completed (percentage earned)
I  Amount of Title IV Earned by student
J  Post-Withdrawal disbursement amount
K  Aid to be returned
L  Institutional charges for the period
M  Percentage of unearned Title IV aid
N  Amount of unearned charges
O  Amount for school to return
P  Total Loans the school must return
Q  Initial amount of unearned aid due from the student
R  Amount in Loans student is responsible to pay back
S  Initial amount of grants to be returned by student
APPENDIX E

Example—Program Offered in Modules

Provided here is an example illustrating many of the changes to the regulations addressing withdrawals from programs offered in modules.

Determination of Withdrawal Questions

As noted on page 66895 of the preamble to the final regulations (October 29, 2010) the following three questions may be used to determine whether a student in a program offered in modules is a withdrawal and the Return of Title IV Funds requirements apply:

Question 1: After beginning attendance in the payment period or period of enrollment, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?

If the answer is no, this is not a withdrawal. If the answer is yes, go to question 2.

Question 2: When the student ceased to attend or failed to begin attendance in a course he or she was scheduled to attend, was the student still attending any other courses?

If the answer is yes, this is not a withdrawal, however other regulatory provisions concerning recalculation may apply. If the answer is no, go to question 3.

Question 3: Did the student confirm attendance in a course in a module beginning later in the period (for non-term and nonstandard term programs, this must be no later than 45 calendar days after the end of the module the student ceased attending)?

If the answer is yes, this is not a withdrawal, unless the student does not return. If the answer is no, this is a withdrawal and the Return of Title IV Funds requirements apply.
Example

This example illustrates (1) how to determine when a student is a withdrawal from a term-based program offered in modules; (2) the amount of aid to use in the Return of Title IV Funds calculation when a student withdraws from a program offered in modules; (3) how to determine the numerator and denominator when calculating the percentage of the payment period completed for a student who withdraws from a program offered in modules; and (4) what steps must be taken when a student who withdrew from a term-based program offered in modules returns within the payment period; (5) how to determine the numerator and denominator when calculating the percentage of the payment period completed for a student who withdraws again.

Program Profile:

Payment Period/Period of Enrollment: Payment period, 15-week semester Program structure for payment period/period of enrollment: Three consecutive five-week modules, 35 days in each module, no scheduled breaks.

A student enrolls for one three-credit course in each of the three modules. Student ceases attending module 1 after completing 10 days. The student does not confirm attendance in a later module. The student does not attend module 2, but returns for the one 3-credit course in module 3. The student withdraws from module 3 after completing 15 days.

When the institution determines that the student has ceased to attend module 1, the institution answers the Determination of Withdrawal Questions to determine whether the student is a withdrawal as follows:

The answer to Question 1 is yes. The student ceased to attend a course the student was scheduled to attend—the three-credit course in module 1. Because the answer to Question 1 is yes, Question 2 must be answered.
The answer to this Question 2 is no. When the student ceased to attend the course in module 1, he or she was not attending any other classes. Because the answer to Question 2 is no, Question 3 must be answered.

The answer to this Question 3 is no. The student did not confirm attendance in a later module. Thus, this student is a withdrawal and the Return of Title IV Funds requirements apply.

If the student was awarded Pell Grant funds, before performing the Return of Title IV Funds calculation, the institution must recalculate the student’s awards to reflect the change in enrollment status from nine credit hours, to three credit hours. These recalculated aid amounts are used in the Return of Title IV Funds calculation.

The percentage of the payment period completed is determined by dividing the number of calendar days completed by the total number of calendar days in the payment period, which included all days within the period that the student was scheduled to complete, except for any scheduled breaks of at least five consecutive days when the student is not scheduled to attend a module or other course offered during that period of time, and any days the student was on an approved leave of absence. The student has completed 10 days. The total number of days in the payment period includes all the days in all the modules the student was scheduled to complete, which is 105 days (three modules of 35 days each). The percentage of the payment period completed is determined by dividing 10 days by 105 days, resulting in .0952, rounded to .095 or 9.50%.

When the student returns for module 3, §668.22(a)(2)(iii)(A) applies, which provides that, if a student withdraws from a term-based credit hour program offered in modules and reenters the same program prior to the end of the period, the student is treated as if he or she did not cease attendance for purposes of determining the student’s aid awards for the period. The student is considered to be in the same payment period he or she was in at the time of the withdrawal and retains his or her original Title IV eligibility for that payment period, provided the student’s enrollment status continues to support the same amount of those funds. To do this, the institution must:
APPENDIX E Cont.

- recalculate the student’s Title IV, HEA program eligibility based upon enrollment in modules 1 and 3 and then re-disburse any Title IV, HEA program funds that had been disbursed and then returned under the Return of Title IV Funds provisions, adjusting, if necessary, for the change in enrollment status from nine credit hours to six credit hours;
- disburse any Title IV, HEA program funds the student was otherwise eligible for that had not yet been disbursed at the time the student withdrew, adjusting for the change in enrollment status; and
- cancel any Title IV overpayments assessed the student as a result of the prior withdrawal that were disbursed upon reentry.

When the institution determines that the student has ceased to attend module 3, the institution again answers the Determination of Withdrawal Questions to determine whether the student is a withdrawal:

The answer to **Question 1** is yes. The student ceased to attend a course the student was scheduled to attend—the three-credit course in module 3. Because the answer to Question 1 is yes, Question 2 must be answered.

The answer to this **Question 2** is no. When the student ceased to attend the course in module 3, he or she was not attending any other classes. Because the answer to Question 2 is no, Question 3 must be answered.

The answer to this **Question 3** is no. There are no later modules in which the student can confirm attendance. Thus, this student is a withdrawal and the Return of Title IV Funds requirements apply.

The total number of days in the payment period is the original 105 days. While the student did not begin module 2, since module 2 was included in the original payment period or period of enrollment and used to determine the amount of Title IV, HEA funds eligibility, the 35 days from module 2 are included in the denominator.

The total number of completed calendar days in the period reflects the completed days in both modules 1 and 3. The student had completed 10 days in module 1 and 15 days in module 3 for a total of 25 days completed in the payment period. The percentage of the payment period completed is determined by dividing 25 days by 105 days, resulting in .238, or 23.8%.