



UPDATED FEBRUARY 27, 2026

Federal regulations require that schools use a Return to Title IV Funds calculation for cases in which a student receiving Title IV financial aid (Pell, SEOG, and Direct Loans) discontinues study during a given semester. When a student discontinues study (drops or withdraws from all courses in a semester) and has received Federal Title IV funding, the university must determine if any portion of the funds are required to be returned to the appropriate financial aid programs. The university is required to perform the calculation within forty-five (45) days of determination of the discontinuance of study.

For full details pertaining to Tulane University's established Return to Title IV policy and procedures, please visit the Tulane University website:

<https://financialaid.tulane.edu/resources/eligibility/title-IV>

Procedures for Students Seeking to Withdraw

Procedures students must take to officially withdraw from Tulane University (whether a voluntary withdrawal; a medical withdrawal; or a required withdrawal) are detailed on the following website:

<https://catalog.tulane.edu/newcomb-tulane/#academicpoliciesext>.

Navigate to the "Withdraw" information tab to obtain full information and details. Failure to attend does not constitute an official withdrawal.

Tulane's Step by Step Procedures for the Return to Title IV (R2T4)

- **Identifying the Last Date of Attendance**

For an official withdrawal, the effective withdrawal date is the first date of notification by the student to the Office of the Registrar or other designated official offices.

For an unofficial withdrawal, the effective withdrawal date is the date the institution becomes aware that the student is no longer attending the institution. For an unofficial withdrawal due to the failure of a student to earn a passing grade, the effective withdrawal date is the midpoint of the semester or the last date of attendance reported by instructors.

For students who are academically dismissed, the effective withdrawal date is the date of the notification of their dismissal.

For students who are suspended, the effective withdrawal date is the due date for the suspension appeal if the appeal is

denied.

Tulane may use a last date of attendance for the effective withdrawal date if:

- The last date a student attended class or academically participated is verified by a Tulane University employee who has knowledge of a student's class attendance; or
- There is an emergency situation and there is third party documentation that verifies a student has not attended class.

Tulane University does not accept a student's self-reported last date of attendance. It is the responsibility of the student to provide documentation of a last date of attendance or academic participation or medical leave of absence approval.

- **Impact of Attendance on Eligibility for a Federal Pell Grant**

The U.S. Department of Education requires Tulane to be able to document that students begin attendance to finalize their Federal Pell Grant eligibility:

"If a student doesn't begin attendance in all of his or her classes, the school must recalculate the student's award based on the lower enrollment status. A student is considered to have begun attendance in all of his or her classes if the student attends at least one day of class for each course in which that student's enrollment status was determined for Federal Pell Grant eligibility."

If applicable, a student's Federal Pell Grant award will be recalculated based on the student's documented enrollment status, prior to a R2T4 calculation being completed.

- **Student's Responsibility for Returning Unearned Aid**

The R2T4 calculations may result in a reduction of the student's Title IV loan and/or grant aid (based on the determined percentage of the semester that the student attended and/or academically participated. Based on the R2T4 calculations, Tulane and the student may be required to return "unearned" federal assistance. An example of this calculation is detailed on our website:

<https://financialaid.tulane.edu/resources/eligibility/title-IV>

If the R2T4 calculation concludes that the unearned institutional costs are lower than the unearned federal aid awarded, then the student must return the difference. However, if the amount to be returned by the student is a loan (not a grant), then no immediate action has to be taken by the student/borrower as the student/borrower will be contacted by their federal student loan servicer at the appropriate time regarding repayment.

Any grant (example: Federal Pell Grant) due from the student will be returned to the U.S. Department of Education by Tulane University. Such a transaction will result in the student's Tulane billing account being charged for the amount that is due the U.S. Department of Education and therefore being returned. Students will receive notification that this transaction has occurred via the Tulane Accounts Receivable Office's billing notification.

Tulane's policy is to return all "unearned aid" that has been disbursed

- **Order for the Return of Federal Funds**

The order in which funds are to be returned during R2T4 calculations is prescribed by the U.S. Department of Education regulations to be as follows:

1. Federal Direct Unsubsidized Loans
2. Federal Direct Subsidized Loans
3. Federal Parent PLUS Loans or Federal Graduate PLUS Loans
4. Federal Pell Grants
5. Federal Supplemental Educational Opportunity Grants (SEOG)

- **Identifying the Timeframe for R2T4**

Tulane University is required to perform R2T4 calculations within forty-five (45) days of the determination of a student's discontinuance of study.

Within 30 days of the final published date of final exams for each semester, Tulane University will identify all students who have no passing grades for the just completed semester. From this listing, the University Financial Aid Office will further review the academic transcripts of these students and identify federal financial aid recipients who have no passing grades, and will deem those students to have unofficially withdrawn (unless University's academic records reflect an official withdrawal to have occurred) Proper R2T4 calculations will be completed and if the end result indicates that federal funds need to be returned, then Tulane will be required to return any "unearned" federal assistance within 45 days after determining the student earned no passing grade.

Students identified as being eligible for a post-withdrawal disbursement of federal student assistance are given 14 days from the date of their notification to respond as to whether they wish to receive such disbursements. If Tulane does not receive a response by the specified deadline, then Tulane cannot make a post-withdrawal disbursement of federal loan funds.

- **Identify How Students are Notified of R2T4 Requirements**

At the conclusion of every R2T4 calculation Tulane provides students with written notification of the R2T4 calculation. If a student feels this determination is incorrect, he/she must contact the Tulane University Financial Aid Office immediately if he/she has information that could lead to a determination that:

- The student did not unofficially withdraw (but rather officially withdrew while the semester was still in session); or
- The student earned at least one of the non-passing grades by attending the class through the end of the semester, completing the course requirements, and receiving the non-passing grade.

Written notifications will also identify if a student is eligible for a post-withdrawal disbursement. Students must respond within 14 days of the date of their written notification to inform Tulane as to whether they wish to receive such a disbursement of funds. Students are encouraged to seriously consider whether it is beneficial to accept a post-withdrawal disbursement, as the disbursement of loan funds increases debt obligations and accepting disbursements may reduce award eligibility for future corresponding awards for attendance at Tulane or at other institutions.

Procedures for COD: *Completing the R2T4 worksheet on the web:*

- Step 1: Determine the student's **withdrawal** date. Remember, this process is only in effect if the student **totally withdraws from the university**. Students officially withdraw from the university through their Dean's Office. The Deans office will send all appropriate documentation to the Registrar's office. The Registrar's

office inputs the official university withdrawal date in Banner on SFAWDRL. A daily report is distributed in Financial Aid for review by the assigned staff.

- Step 2: Determine the percentage of aid earned
- Step 3: Determine the amount of aid earned
- Step 4: Determine the amount of aid unearned
- Step 5: Determine the school and student shares of unearned aid
- Step 6: Allocate unearned aid

All refund calculations will be done utilizing the Department of Education's online "Return to Title IV" website calculator (summer calculations may be modified to account for multiple term start/end dates)

If disbursed aid exceeds earned aid:

- 1) Determine the amount of unearned aid by subtracting earned aid from disbursed aid
- 2) Distribute the responsibility for returning unearned aid between the school and the student
- 3) If unearned funds must be returned, allocate unearned aid to programs from which student was funded
- 4) Return the institution's share and any funds repaid by the student or refer the overpayment to ED

If earned aid exceeds disbursed aid:

- 1) Determine the amount of a post-withdrawal disbursement by subtracting disbursed aid from earned aid
- 2) If a post-withdrawal disbursement is due, determine the sources from which it will be funded and credit any grant portion towards allowable and/or authorized unpaid charges
- 3) Offer and obtain the student's, or parent's in the case of a parent PLUS, authorization to credit the loan portion of the post-withdrawal disbursement towards allowable and/or unpaid charges
- 4) Directly disburse to the student any amount of a post-withdrawal disbursement of grant funds which is not credited toward allowable and/or authorized unpaid charges
- 5) Offer student (or parent PLUS borrower) any portion of the post-withdrawal disbursement of loan funds not credited towards unpaid charges and make the post-withdrawal disbursement if the offer is accepted

Federal regulations address the treatment of modular programs for all types of program formats: term-based credit hour programs, non-term programs, nonstandard term programs, and clock hour programs. A program is considered "offered in module" if a course or courses in the program do not span the entire length of the payment period or period of enrollment.

A student is considered to have withdrawn if the student does not attend all days, for a credit hour program, or complete all clock hours he or she was scheduled to attend.

There are some exceptions for students who return within a defined period of time to the same payment period, **or** who indicate the intent to return within a certain time period. Under certain circumstances, schools may have to "undo" a withdrawal calculation and reinstate returned aid funds.

Federal regulations concerning schools as being required to take attendance, encompassing schools that take attendance for just a limited period of time (other than a single day) at the beginning of a term or payment period offer the following:

Any institution that voluntarily requires its faculty to take attendance is, under the new rules, subject to the same rules for institutions that are required by outside entities to take attendance, such as an accrediting or state agency.

- *Although many do, Tulane University faculty **are not required** to take attendance.*

Regardless of whether a school is required to take attendance or not, "academic attendance" and "attendance at an academically-related activity" must meet the definition of "academic engagement" under [34 CFR 600.2](#):

Active participation by a student in an instructional activity related to the student's course of study that is defined by the institution in accordance with any applicable requirements of its State or accrediting agency; and includes, but is not limited to:

- Attending asynchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;
- Submitting an academic assignment;
- Taking an assessment or an exam;
- Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;
- Participating in a study group, group project, or an online discussion that is assigned by the institution; or
- Interacting with an instructor about academic matters.

The definition of academic engagement does not include activities where a student may be present, but not academically engaged, such as:

- Living in institutional housing;
- Participating in the school's meal plan;
- Logging into an online class or tutorial without any further participation; or
- Participating in academic counseling or advising.

The determination of academic engagement must be made by the institution in accordance with any state and/or accrediting agency requirements. A student's self-certification alone is not sufficient documentation of academic engagement; it must be supported by institutional documentation of the student's attendance in the activity.

Any time a student begins attendance in at least one course but does not begin attendance in all the course he or she was scheduled to attend, regardless of whether the student is a withdrawal, the school must check to see if it is necessary to recalculate the student's eligibility for a federal Pell Grant and campus-based funds based on a revised enrollment status and cost of attendance (COA). If the student is a withdrawal, this recalculation must be done before performing a R2T4 calculation, and the school must use the recalculated amounts of aid in the R2T4 calculation.