

**Part 1. Introduction:**

RCTC is not required to, and does not, record student attendance. Federal regulations mandate that the college have a procedure in place to ensure that students have attended, at a minimum, one class session in each course in which that student has registered, if that course was used to determine enrollment status for Federal Pell Grant. (34 CFR 668.21)

Students 'earn' financial aid in proportion to the time they are actively enrolled in courses, up to the 60 percent point of the term. If a student withdraws from all credits or otherwise ceases attendance in courses prior to the 60 percent point of the term, financial aid disbursed to the student must be evaluated under the Federal Return to Title IV refund regulations. These regulations include a formula RCTC must use to determine if a repayment is owed to the financial aid programs for which the student was funded. The amount to be returned is often referred to as 'unearned funds'. The Federal Return to Title IV regulations also require RCTC to determine if a post-withdrawal disbursement is owed for a student who qualified for aid that could have been disbursed.

**Part 2. Procedure:**

After the add/drop period for each course has ended, faculty members will be asked to review their class lists and identify students who have never attended the course. In most cases, this reporting will occur on the sixth class day of the semester. Reminder notifications will be sent to faculty throughout the term to request notification of non-attendees for late-start courses as well as students who may have stopped attending, but have not withdrawn. Classes the student has not attended are flagged as ineligible for financial aid in the ISRS system and are not included in the award calculation for disbursement of funds. If a faculty member does not report a student as a non-attender, it is inferred that the student has attended at least one class session.

If a student officially withdraws from all courses (total withdrawal), a Return to Title IV refund calculation is required. The calculation is completed as prescribed by regulation and the student is notified of any financial liability. RCTC will immediately return amounts owed to Financial Aid programs and the student is then billed for these amounts. In cases where a post-withdrawal disbursement is due, RCTC will notify the student of the amount and ask for consent to disburse these funds.

Students who have unofficially withdrawn are identified based on faculty assigning a last date of attendance and a grade of FW or FN. Students who unofficially withdraw are also subject to the Return to Title IV refund calculation. The student's last date of attendance for purposes of the Return to Title IV calculation will be defined as the last date of withdrawal (if applicable) or the last date of attendance as reported by faculty, whichever is later. The calculation is completed using this last date of attendance and a letter is sent to notify the student of their financial liability (or post-withdrawal disbursement owed). If the student's instructors provide documentation of attendance beyond the 60 percent point of the term, no repayment to Financial Aid programs is required. Federal regulations consider the student to have earned all of their aid if the student's attendance extends beyond the 60 percent point of the term.

RCTC is responsible for monitoring student records on a regular basis to identify those subject to the Return to Title IV refund regulation. Every effort is made to identify students as soon as possible after their withdrawal (official or unofficial). A review of all student records is also conducted no later than 30 days after the conclusion of each term to identify students who may be subject to this regulation based on reported grades. Once the calculation is completed, RCTC is required to return unearned funds within 45 days from the date the College determine the student to have withdrawn. As prescribed in regulation, RCTC returns unearned funds to the Financial Aid program in the following order.

1. Federal Unsubsidized Direct Loan
2. Federal Subsidized Direct Loan
3. Federal PLUS Loan
4. Federal Pell Grant
5. Federal SEOG

Once the Federal Return to Title IV Refund Policy is applied, students who receive financial aid funding from the State of Minnesota are also evaluated based on the Minnesota Office of Higher Education refund policies.

*Date of Implementation: Immediate*  
*Date of Adoption: 4/25/06*  
*Updates: July 2011; 5/13/15; 11/1/17 (no changes)*

  
Mary Davenport, Interim President

11/1/2017  
Date