

Appendix B

Required Actions When a Student Dies

When a School Receives Information That a Student Has Died

If your school receives information during the school year indicating that a current recipient of *Title IV* aid has died, you must determine the validity of that information. Until you have made this determination, you may not make additional disbursements of *Title IV* aid to the student (including releasing any *Title IV* credit balance that has not already been paid).

To avoid causing distress to a student's family and friends based on an inaccurate report of a student's death received by your school, you should first attempt to confirm the death through public and internal sources. If there is no local newspaper report of a student's death, you can conduct an online search of the student's hometown newspaper and the newspapers in the location where the death was reported to occur.

Internally, you should get attendance reports from the faculty in whose classes the student is currently enrolled. If the student lives or previously lived on campus, you should contact the appropriate residence hall staff to see what information the staff possesses. Faculty members and residence hall staff should be told that if the student is present, it is critical for the student to call or visit the financial aid office to confirm that they are not deceased.

You should also write the student at the student's address of record and at any electronic address available (email and social media) to inform the student that you have reason to believe the student is deceased and will not be making further disbursements of financial aid to the student until the student calls or visits the financial aid office.

You should complete your internal attempt to resolve the report of the student's death within 30 days. If you have not resolved the report of the student's death after 30 days, you should seek information from the student's family named on the *Free Application for Federal Student Aid* (FAFSA) form (if the student is dependent or married) and any references the student provided during entrance counseling (if the student is a recipient of a federal student loan).

If you are unable to confirm the student's death, but the student is no longer in attendance, you must make a determination that the student has withdrawn 30 days after the end of the earlier of the:

- payment or enrollment period;
- academic year in which the student was enrolled;
- educational program that the student was attending.

If a return of *Title IV* funds is required under [34 CFR 668.22](#), you must return the funds as soon as possible, but no later than 45 days after the date you determined the student withdrew. For more details on the procedures and requirements for returning aid, see the *Federal Student Aid Handbook, Volume 5, Chapter 1*.

Obtaining a Death Certificate or an Acceptable Copy of a Death Certificate

If you confirm that a current recipient of *Title IV* aid has died, you should try to obtain an original or certified copy of the recipient's death certificate, or an accurate and complete photocopy of the original or certified copy of the death certificate.

You may be able to obtain a death certificate from the local government record offices where the death occurred or the local government offices where the student's permanent residence was located. For example, you can contact the vital records office for the student's home state (a list is available at <https://www.cdc.gov/nchs/w2w/index.htm>) and ask about the possibility of obtaining a death certificate and the steps for obtaining it; paying a fee is typically also required.

Since individual state rules for documenting the death of an individual and obtaining a copy of an individual's death certificate differ widely, you should consult with your school's attorney to establish procedures for obtaining the required documentation from local authorities in your state.

FAFSA Processing System Match with the Social Security Administration

The Social Security numbers of applicants currently in Federal Student Aid's FAFSA Processing System (FPS) for all award years currently being processed are matched against Social Security Administration records. If the FPS receives information after a record has been initially processed that suggests a student is now deceased, the FPS will send the student's information back to the Social Security Administration for rematching. If the student is confirmed as deceased, a new Institutional Student Information Record (ISIR) will be generated and sent to all schools indicated on the student's FAFSA form. The new ISIR will include Comment Code 009, with comment text explaining the action that the student must take. For more information, see *Volume 6* and *Volume 7* of the [2024-25 FAFSA Specifications Guide \(June 2024 Update\)](#).

Enrollment Reporting When a Current Student Has Died

If you have obtained a copy of the death certificate for a current student, you must update the student's status in the U.S. Department of Education's (the Department's) National Student Loan Data System (NSLDS). If you are due to perform your regular Enrollment Status Reporting within the next 14 days, you may use that process to update the student's status. If your regular Enrollment Reporting is more than 14 days in the future, we recommend that you manually update the student's enrollment status on the NSLDS Professional Access Web site at <https://nsldsfa.ed.gov> to a status of "D" as soon as possible.

Withdrawal Date When a Student Dies

If your school is not required to take attendance and you are informed that a student has died, you must determine the withdrawal date for the student according to the guidance contained in [34 CFR 668.22\(c\)\(1\)\(iv\)](#). This regulation states that if a school determines that a student did not begin the school's withdrawal process or otherwise provide official notification of their intent to withdraw because of illness, accident, grievous personal loss, or other such circumstances beyond the student's control, the withdrawal date is the date that the school determines is related to that circumstance.

The withdrawal date can be no later than the date of the student's death. If your school is required to take attendance, the withdrawal date for a student who has died is the last date of attendance as determined from your school's attendance records. **You must maintain the documentation you received that the student has died** and determine an appropriate withdrawal date.

Post-Withdrawal Disbursements, Return of *Title IV* Funds, and Treatment of Credit Balances When a Student Dies

You may not make a post-withdrawal disbursement of *Title IV* funds to the account or estate of a student who has died.

If you determine that a student died during a period in which the student was receiving *Title IV* aid, your school must perform a Return to *Title IV* Funds (R2T4) calculation (see *Volume 5* of the *Federal Student Aid Handbook*) and then return any *Title IV* funds for which it is responsible under this calculation.

A deceased student's estate is not required to return any *Title IV* funds disbursed to the student. Therefore, you should neither report a grant overpayment for a deceased student to NSLDS, nor refer a grant overpayment for a deceased student to the Default Resolution Group (see below). If you had previously reported a grant overpayment for a student who is deceased to the Default Resolution Group, you should inform the Default Resolution Group that you have received notification that the student is deceased.

If a *Title IV* credit balance created from funds disbursed before the death of the student exists after the completion of the R2T4 calculation and the institutional refund calculations, you must resolve the *Title IV* credit balance by taking the following actions:

1. In accordance with the cash management regulations, paying authorized charges at the school (including previously paid charges that are now unpaid due to the Return of *Title IV* funds by the school).
2. Returning any *Title IV* grant overpayments owed by the student for previous withdrawals from the present school. You may deposit the funds in your federal funds account and make the appropriate entry in G6.

If you previously referred the grant overpayment to the Default Resolution Group (see below), you should provide the

Default Resolution Group with documentation that the student has died so that the Default Resolution Group can delete the overpayment from its records.

3. Returning any remaining credit balance to the *Title IV* programs.

Default Resolution Group

U.S. Department of Education

Default Resolution Group

P.O. Box 5609

Greenville, TX 75403-5609

800-621-3115

When a Federal Student Loan Borrower or TEACH Grant Recipient Dies

The regulations governing Direct Loans, Federal Family Education Loan (FFEL) Program loans, and Perkins Loans (including Defense Loans and NDSL loans) provide for discharge of a borrower's obligation to repay those loans if the borrower dies (including a parent borrower's obligation to repay a Direct PLUS Loan or Federal PLUS Loan if the student on whose behalf the parent borrowed dies). In addition, if a student who received a grant under the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program dies, the obligation to complete the TEACH Grant service obligation is discharged.

If you are aware that a student who has died has any outstanding *Title IV* loans or received TEACH Grants, you should contact the student's estate and explain the actions that can be taken to have the student's *Title IV* loan debt or TEACH Grant service obligation discharged. You should also notify the loan servicer or (for a TEACH Grant) the Department that the student or parent has died. Unless the deceased student has an outstanding Perkins Loan that is held by your school, you are not responsible for gathering the documentation needed to discharge the borrower's outstanding loans or TEACH Grant service obligation.

Discharge When a Student Loan Borrower or TEACH Grant Recipient Dies

Direct Loan Program: [34 CFR 685.212\(a\)](#)

TEACH Grant Program: [34 CFR 686.42\(a\)](#)

Perkins Program: [34 CFR 674.61](#)

FFEL Program: [34 CFR 682.402\(b\)](#)

Documentation Required for Discharge of a Federal Student Loan or TEACH Grant Service Obligation When a Student Dies

The information that follows is provided for reference only. As noted earlier in this Appendix, you are not responsible for gathering the documentation needed to discharge a deceased borrower's outstanding loans or TEACH Grant service obligation, except in the case of a Perkins Loan that is held by your school. For more information on discharging a Perkins Loan due to the borrower's death, see *Volume 6* of the *Federal Student Aid Handbook*.

To discharge the unpaid balance (including interest) of a *Title IV* loan or TEACH Grant service obligation, the loan holder or servicer must obtain:

- an original or certified copy of the death certificate or an accurate and complete photocopy of the original or certified copy of the death certificate for the person who has died;
- an accurate and complete original or certified copy of the death certificate for the person who has died that is scanned and submitted electronically or sent by facsimile transmission; or
- verification of the borrower's death through an authoritative Federal or State electronic database approved for use by the Department.

In exceptional circumstances and on a case-by-case basis, a discharge may also be approved based on other reliable documentation of the borrower's death that is acceptable to the Department (for a Direct Loan, a TEACH Grant service obligation, or a FFEL Program loan or Perkins Loan that is held by the Department), the chief financial officer of the institution (for a Perkins Loan that is held by the school), or the chief executive officer of the guaranty agency (for a FFEL Program loan that is not owned by the Department).

Documentation Required for Discharge of a Federal Student Loan or TEACH Grant Service Obligation When a Student Dies

Direct Loan Program: [34 CFR 685.212\(a\)](#)

TEACH Grant Program: [34 CFR 686.42\(a\)](#)

Perkins Program: [34 CFR 674.61\(a\)](#)

FFEL Program: [34 CFR 682.402\(b\)\(2\)](#)

When a Deceased Student Has Earned Federal Work Study (FWS) Income

You may deliver any FWS income earned by a deceased student to the student's estate.