

Adds, Drops and Withdrawals

Administering Adds, Drops, and Withdrawals



David Bartnicki | October 9-11, 2019
U.S. Department of Education
KASFAA Fall Conference

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Adds and Drops: Pell Recalculation Overview

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Mandatory Pell Recalculations

- Pell must be recalculated if the student's EFC changes
- Pell must be recalculated to reflect changes to enrollment status between terms
- A student must start all credits for which Pell is paid
 - If a student does not start all credits for which they are paid, the school must perform a mandatory Pell recalculation and pay Pell based upon the credits in which the student actually began attendance

34 C.F.R. § 690.80

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Pell Recalculation Date (PRD)

- Schools are permitted to set a Pell Recalculation Date (PRD) as a means to establish a time frame for students to add or drop courses to determine a student's enrollment status for Pell Awarding purposes
- Schools will often refer to the Pell Recalculation Date as a "census date," "freeze date," or "add/drop date." Since these terms can have alternative meanings outside of Title IV administration, they will not be used in this presentation

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Pell Recalculation Options

If a school wishes to use a Pell recalculation policy, it has the following options:

- Policy for Pell recalculation throughout term for every add or drop course occurrence
- Policy for Pell recalculation based on enrollment status from a single fixed date
- Policy for Pell recalculation to account for modules within a term

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Example: Pell Recalculation Policy

Hometown Community College has a Fall term start of August 15, 2017 *with a PRD of August 30, 2017.*

Sarah begins attendance on 8/15 with 6 credit-hours, but adds an additional course for 3 credit-hours on 8/22. Sarah's enrollment status for Pell purposes = 9 credit-hours.

Ben begins attendance on 8/15 with 12 credit-hours, but drops two courses for a total of 6 credit-hours on 8/25. Ben's enrollment status for Pell purposes = 6 credit-hours.

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Example: Pell Recalculation Policy

Hometown Community College has a Fall term start of August 15, 2017 with a PRD of August 30, 2017.

Gracie begins attendance on 8/15 with 6 credit-hours, but adds an additional course for 3 credit-hours on 9/1. Gracie's enrollment status for Title IV purposes = 6 credit-hours.

Joshua begins attendance on 8/15 with 12 credit-hours, but drops 2 courses for a total of 6 credit-hours on 9/1. Joshua's enrollment status for Title IV purposes = 12 credit-hours.

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Withdraws Prior to PRD

When determining Pell eligibility a school must use enrollment status established on earliest of the date of withdrawal or the PRD

- If student withdraws prior to arrival of PRD, school must use the enrollment status the student established at the time of the withdrawal when calculating Pell eligibility
- If student adds a course after PRD and subsequently withdraws, school must use the enrollment status established by the student at the time of the PRD when calculating Pell eligibility

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Withdraws Prior to PRD

Example: Hometown Community College has a Fall term start of August 15, 2017 with a PRD of August 30, 2017.

Alyssa begins attendance on 8/15 with 6 credit-hours, but withdraws on 8/22. Alyssa's enrollment status for Pell = 6 credit-hours.

Kelsey begins attendance on 8/15 with 6 credit-hours, then drops 3 credit-hours on 8/20, and finally drops the remaining 3 credit-hours on 8/25. Kelsey's enrollment status for Pell = 3 credit-hours.

Scott begins attendance on 8/15 with 6 credit-hours, but adds 2 courses for an additional 6 credit-hours on 9/1. Subsequently, he drops all courses on 10/15. Scott's enrollment status for Pell = 6 credit-hours.

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Post-PRD Initial Enrollment

If a program is offered in modules and the student initially enrolls after the established PRD, the school must use the enrollment status from the *later* of the PRD or when the school is able to perform an initial Pell calculation.

- Typically the initial Pell calculation would not take place until the student enrolled (which in this case was after the PRD)

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Post-PRD Initial Enrollment

Example: Hometown Community College has a Fall term start of August 15, 2017 *with a single PRD of August 30, 2017*. In addition to full-length courses, they also have modules within the term.

Paul does not register or begin attendance at the start of the term, but on 9/15 decides he wants to enroll in two modules (6 credit-hours) to start on 10/1. Provided Paul begins attendance in both modules, his enrollment status for Pell = 6 credit-hours.

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Post-PRD Initial Enrollment

Example: Hometown Community College has a Fall term start of August 15, 2017 *with a single PRD of August 30, 2017*. In addition to full-length courses, they also have modules within the term.

John begins attendance on 8/15 with 6 credit-hours, but decides to enroll in a module course (3 credits) on 10/1 – the start date of the module. John's enrollment status for Title IV purposes = 6 credit-hours.

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Initial ISIR Received after PRD

If a student files a FAFSA® later in the payment period and the school subsequently receives an official ISIR after the PRD, school must use the enrollment status from the later of the PRD or when the school is able to perform an initial Pell calculation.

- In this case the initial Pell calculation could not have taken place until the school received the initial ISIR with an official EFC

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Initial ISIR Received After PRD

Example: Hometown Community College has a Fall term start of August 15, 2017 *with a PRD of August 30, 2017.*

David begins attendance as a full-time student in 12 credit-hours but did not fill out a FAFSA form and therefore is not initially eligible for Title IV aid. On September 2, 2017 David goes to FAFSA on the Web and on September 5, 2017, the school receives an official ISIR for David.

At the time the school does an initial Pell calculation, David is enrolled in 12 credit-hours, therefore his enrollment status for Pell = 12 credit-hours.

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Initial ISIR Received After PRD

Example: Hometown Community College has a Fall term start of August 15, 2017 with a PRD of August 30, 2017.

Bruce begins attendance as a full-time student in 12 credit-hours but did not fill out a FAFSA and is therefore not initially eligible for Title IV aid. On September 10, 2017 Bruce drops one 3 credit course.

On September 15, 2017 Bruce goes to FAFSA on the Web and on September 17, 2017, the school receives an official ISIR for Bruce.

At the time the school does an initial Pell calculation Bruce is enrolled in 9 credit-hours, therefore his enrollment status for Pell = 9 credit-hours.

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Administering Pell Recalculation for Modules

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PRDs and Modules

- It is acceptable for a school to assign a potential PRD to each module within a term
 - The PRD is activated only in the event the student begins attendance in the assigned module
 - If the student does not begin attendance in an assigned module, the school should use the latest active PRD to determine the enrollment status
- When a PRD is activated all courses within the payment period are considered when determining enrollment status

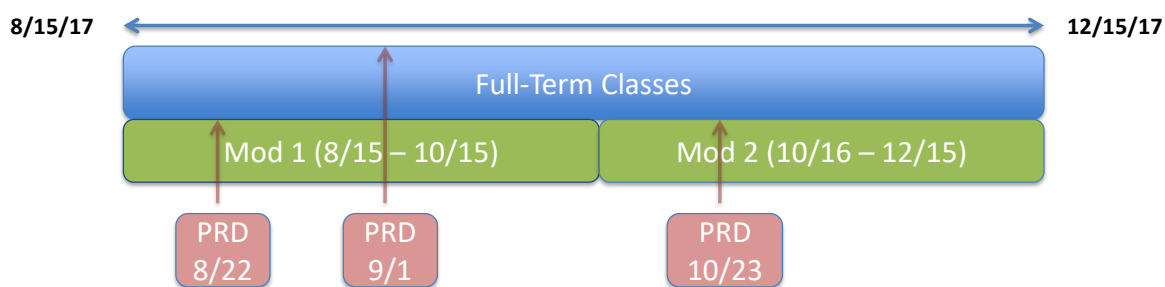
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PRDs and Modules



Hometown Community College has a term start date of 8/15/17 and term end date of 12/15/17. The school has three different PRDs of 8/22/17, for Mod 1 courses, 9/1/17 for full-term courses and 10/23/17 for Mod 2 courses.

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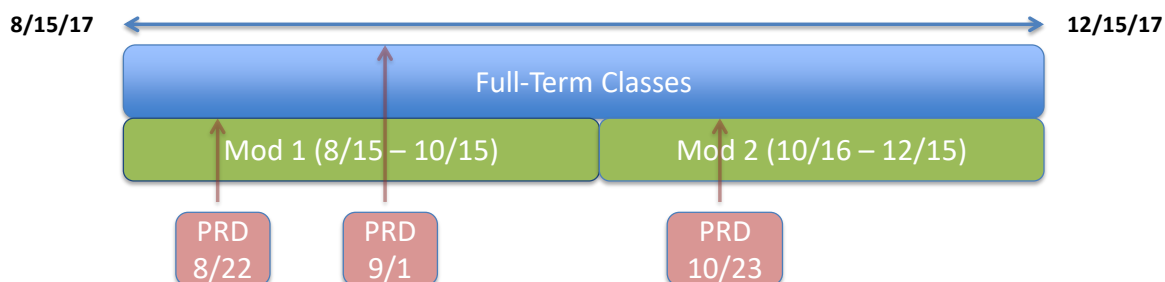
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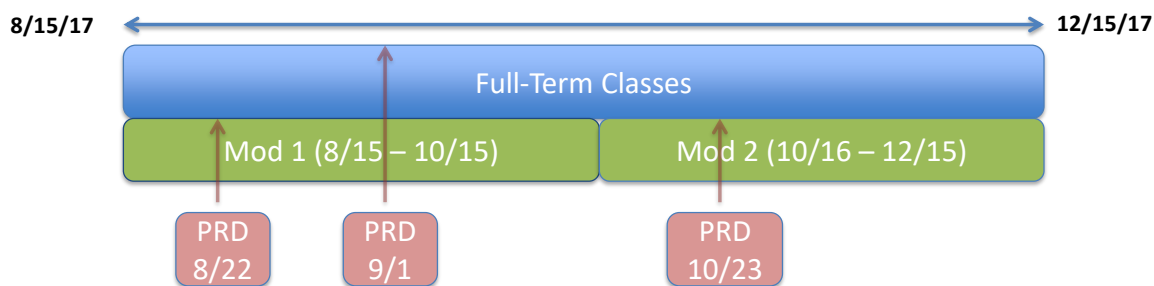
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PRDs and Modules



Jesse is scheduled to attend 6 credits in the full-term courses, 3 credits in Mod 1 and 3 credits in Mod 2. He drops a full-term course (3 credits) on 9/5 and the Mod 2 course (3 credits) on 10/20. Since he began attendance in the Mod 2 course, 10/23 PRD is used. Enrollment status for Pell = 6 credit-hours.

PRDs and Modules



Michelle is scheduled to attend 6 credits in full-term courses, 3 credits in Mod 1 and 3 credits in Mod 2. She drops a full-term course (3 credits) on 9/5 and never begins attendance in Mod 2. Since she did not attend class in Mod 2, the 9/1 PRD is used. Enrollment status for Pell = 9 credit-hours.

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Adds and Drops: Direct Loans

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Add/Drops and Direct Loans

- PRDs (or census dates) have no relevance when determining enrollment status for Direct Loans
- For Direct Loans, the school must determine eligibility at the time of disbursement
- An otherwise-eligible student must be *enrolled* at least half-time at the time of the disbursement
 - To ultimately be eligible for a DL, the student must have been enrolled half-time at the time of disbursement and started at least one class
- It is important for the school to have a process to confirm enrollment status prior to disbursement

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Early Disbursements

An institution that disburses Direct Loan funds up to 10 days prior to enrollment start date must ensure student is scheduled to attend at least half-time prior to disbursement.

- If student begins attendance as less-than-half-time (starts a class), the disbursement is eligible
- Subsequent disbursements within term cannot be made unless student maintains or reestablishes half-time status
- Repaid in accordance with terms/conditions of promissory note (*unless* school is required to return loan funds under R2T4 because of a student withdrawal)

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Early Disbursements

- If student does not begin attendance, the school must return any Direct Loan funds credited to the student's account
- For any remaining loan funds disbursed directly to a student, the school must notify the appropriate loan servicer of the loan funds that are outstanding, so that the Department can issue a 30-day demand letter to the student

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Withdrawal Dates

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When a Student is Considered Withdrawn

- In the case of a program that is measured in credit-hours, the student does not complete all the days in the payment period or period of enrollment that the student was scheduled to complete
- In the case of a program that is measured in clock-hours, the student does not complete all of the clock-hours and weeks of instructional time in the payment period or period of enrollment that the student was scheduled to complete

34 C.F.R. § 668.22(a)(2)

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When a Student is Considered Withdrawn

In the case of a non-term or non-standard term program, the student is not scheduled to begin another course within a payment period or period of enrollment for more than 45 calendar days after the end of the module the student ceased attending, unless the student is on an approved leave of absence.

34 C.F.R. § 668.22(a)(2)

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When a Student is Considered Withdrawn

If a student ceases attendance (drops or withdraws) from all his or her Title IV eligible courses in a payment period or period of enrollment, the student must be considered a withdrawal for Title IV purposes. Even if the student is still enrolled in non-Title IV courses.

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Schools Required to Take Attendance

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Institutions Required to Take Attendance

- Outside entity requires that attendance be taken
- Institution has its own requirement that instructors take attendance
- Outside entity or institution has a requirement that can only be met by taking attendance

Note: Required attendance could be for an entire institution, department, or program

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Institutions Required to Take Attendance

- Must use its official attendance records to determine withdrawal date (WD)
- Last date of attendance must be the withdrawal date

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Withdrawal Date

The goal of the Return provisions is to identify the date that most accurately reflects the point when a student ceases academic attendance, not the date that will maximize federal student aid to the institution or to the student.

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Schools Not Required to Take Attendance

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Institutions Not Required to Take Attendance

- Not required to take attendance by an outside entity
and
- No formal school policy to take attendance
 - Most traditional credit-hour institutions fit into this category

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Withdrawal Date – Official Notification

- Official Withdrawal
 - Date student *began* school's official withdrawal process
 - Date student otherwise provided "official" notice
 - Official notification provided to a designated school official in official capacity
 - In writing or orally
 - School must document oral notifications
 - If both dates triggered, use the earlier date

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Withdrawal Date – Special Circumstances

- Withdrawal due to circumstances beyond student's control
 - Withdrawal date can be the date the circumstance occurred (e.g. illness, accident, grievous loss, etc.)
 - Withdrawal date could be later if the student continues attendance despite circumstance but later withdraws
 - If circumstance applies to administrative withdrawal (e.g. expels, suspends, or cancels registration) the withdrawal is the date the school terminates enrollment.

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Withdrawal Date – Student Dies

- When student dies must use guidance under 34 C.F.R. § 668.22(c)(1)(iv)
 - The withdrawal date is determined by the institution as to when the circumstance occurred that caused the student's death
 - The withdrawal date can be no later than the date of the student's death, unless the student withdrew previously due to other circumstances

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Withdrawal Date – Unofficial Withdrawals

- Midpoint of the payment period or period of enrollment
 - For other withdrawals without notification, the withdrawal date is the midpoint of the payment period or the period of enrollment

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Withdrawal Dates – Academically-Related Activity

- Academically-related activity
 - School may use school documented attendance at an academically-related activity in lieu of any of the withdraw dates (official or unofficial)
 - Student cannot self-certify attendance
 - The school must document
 - The activity is academic or academically-related, and
 - The student's attendance at the activity

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Academically-Related Activity

- Academically-related activities include but are not limited to
 - Physically attending a class where there is opportunity for direct interaction between the instructor and the students
 - Submitting an academic assignment
 - Taking an exam, completing an interactive tutorial, or participating in computer-assisted instruction
 - Attending a study group that is assigned by the school
 - Participating in online discussion *about academic matters*
 - Initiating contact with a faculty member to ask a question *about the academic subject studied in the course*

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Academically-Related Activity

- Academically-related activities does not include:
 - Living in institutional housing
 - Participating in the school's meal plan
 - *Logging into an online class without active participation*
 - Participating in general academic counseling or advisement

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Student Fails to Earn a Passing Grade

- If a student who began attendance and has not officially withdrawn fails to earn a passing grade in at least one course offered over an entire period, the institution must assume, for Title IV purposes, that the student has unofficially withdrawn
 - Unless the institution can document that the student completed the period

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Date of Determination

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Date of Determination

- The date the school becomes aware that a student ceased attendance
- For a student who provides notification of withdrawal to the institution, the date of determination is the later of the student's withdrawal date or the date of notification of withdrawal

34 C.F.R. § 668.22(l)(3)(i)

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Date of Determination – Unofficial Withdrawals

If Attendance Required

- Cannot be more than 14 calendar days after Last Date of Attendance (LDA)

If Attendance Not Required

- Within 30 calendar days from the earlier of
 - End of payment period or period of enrollment
 - End of the academic year
 - End of student's educational program

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Reminder about Deadlines

30 days from date of determination to

- Perform the R2T4 calculation
- Notify the student of a grant overpayment
- Notify the student of eligibility for a post-withdrawal disbursement (PWD) of a Title IV loan and request confirmation

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Reminder about Deadlines

45 days from the date of determination to

- Return Title IV, HEA student aid funds (ASAP, but no later than)
- Make a PWD of Title IV Grant funds directly to student (ASAP, but no later than)

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Reminder about Deadlines

- 180 days from the date of determination to
- Make a PWD of Title IV Grant funds as a credit to student's account
- Make a PWD of Title IV Loan funds (ASAP, but no later than)
 - Must receive confirmation from student/parent before making the disbursement

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Enrollment Reporting Reminders

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Enrollment Reporting Deadlines

- Schools are required to schedule a roster file to be sent by NSLDS a minimum of every 60 days or less
- Schools must certify enrollment data within 15 days of the roster file being sent by NSLDS
- If a response is provided by batch file response, NSLDS will process an Error/Acknowledgment file. Errors must be corrected within 10 days

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Enrollment Status Codes

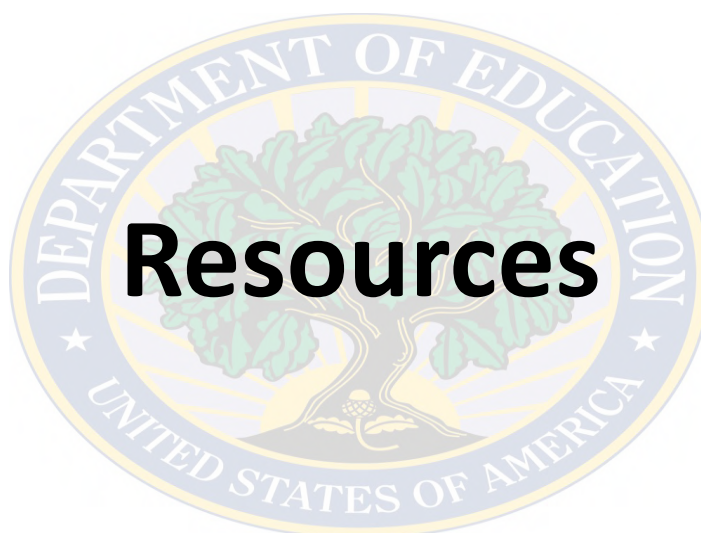
- 'F' (full-time)
- 'Q' (three-quarter time)
- 'H' (half-time)
- 'L' (less than half-time)
- 'A' (leave of absence)
- 'G' (graduated)
- 'W' (withdrawn)
- 'D' (deceased)
- 'X' (never attended)
- 'Z' (record not found)

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Resources

Federal Student Aid Handbook

Volume 3, Chapter 3	Pell Recalculations
Volume 4, Chapter 2	Direct Loan Disbursements
Volume 5, Chapters 1 & 2	Withdrawals

Federal Regulations – 34 C.F.R. §

690.80	Pell Recalculations
668.21	Student Does Not Begin Attendance
668.22(c)	Notification of Withdrawal
668.22(l)(3)(i)	Date of Determination

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Training Feedback

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- All registrants for this session will receive an email with a link to an electronic evaluation that we ask you to complete
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for “listening” to our customers
- To register, please go to: <https://cvent.me/zA8B3>

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Ask A Fed goes online!

FSA has implemented a new resource to assist Financial Aid Administrators obtain guidance about the FSA programs. Based on the popularity and effectiveness of the Ask A Fed desk at the annual FSA Training Conference, we have instituted a similar process using email. Please send your inquiries about Title IV regulations to AskAFed@ed.gov.



The Ask A Fed email box is staffed every business day by a team of FSA Training Officers ready to assist schools with their questions.

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