


Adds, Drops and Withdrawals

Administering Adds, Drops, and Withdrawals



Bruce Honer | March 2017
U.S. Department of Education
PacFAA Annual Conference

Federal Student Aid | PROUD SPONSOR of the AMERICAN MIND®

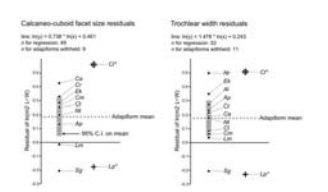
Agenda

- Adds, Drops, and Pell Recalculation Overview
- Administering Pell Recalculation for Modules
- Add, Drops, and Direct Loans
- Withdrawal Definitions and Overview
- Withdrawals for Schools Required to Take Attendance
- Withdrawals for Schools Not Required to Take Attendance
- Enrollment Reporting Reminders

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Adds and Drops: Pell Recalculation Overview



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Pell Recalculation Date (PRD)

- Schools are permitted to set a Pell Recalculation Date (PRD) as a means to establish a timeframe 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

- No Pell recalculation policy
- 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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Mandatory Pell Recalculation

- Regardless of the optional Pell recalculation policy a school may adopt, 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 actual credits the student began attendance in

6 34 CFR 690.80 Federal Student Aid | PROUD SPONSOR OF THE AMERICAN MIND®
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If No Pell Recalculation Policy

- If a school doesn't establish a policy for recalculation within a term, a student who begins attendance in all classes would be paid based on the initial calculation, even if his or her enrollment status changes before the disbursement is made
- *Initial Calculation Definition:* An initial calculation is the first calculation that is made on or after the date the school has received an ED-produced EFC and uses the enrollment status at the time of the initial calculation

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If No Pell Recalculation Policy

Crystal Clear College does not have a Pell Recalculation Policy.

They receive Ariel's Pell Eligible ISIR on August 5, 2016 and provide an initial calculation that she is scheduled to begin attendance as a full-time student at the start of the term on August 15, 2016.

Ariel begins attendance as a full-time student but drops 3 credit hours on August 20, 2016. Ariel will still receive full-time Pell since the school is required to use the initial calculation.

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If No Pell Recalculation Policy

Crystal Clear College does not have a Pell Recalculation Policy.

They receive Ariel's Pell Eligible ISIR on August 5, 2016 and provide an initial calculation that she is scheduled to begin attendance as a half-time student on August 15, 2016.

Just before term start, Ariel adds two more classes and is enrolled full-time on August 15, 2016 when classes begin. The school is required to use the initial calculation of half-time enrollment status for Pell awarding.

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If No Pell Recalculation Policy

Crystal Clear College does not have a Pell Recalculation Policy.

They receive Kevin's Pell Eligible ISIR on August 5, 2016 and provide an initial calculation that he is scheduled to begin attendance as a full-time student at the start of the term on August 15, 2016.

Kevin does not begin attendance in two of the classes and is considered half-time at the term start. The school must recalculate for half-time status since Kevin is ineligible for the initial full-time Pell originally calculated.


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School Has Pell Recalculation Policy

Example: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016.

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 2 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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School Has Pell Recalculation Policy

Example: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016.

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 date of a withdrawal or PRD

- If student withdraws prior to arrival of PRD, school must use the enrollment status the student established as 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: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016.

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

If a program is offered in modules and the student enrolls after the established PRD, the school must use the enrollment status from the *later* of the PRD or when the student enrolls.

- In this case the initial Pell calculation could not have taken place until the student enrolled which was after the PRD



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Post PRD Enrollment Starts

Example: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016. In addition to full-length courses, they also have modules within the term.

Paul does not 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 Enrollment Starts

Example: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016. In addition to full-length courses, they also have modules within the term.

Nancy 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. Nancy's enrollment status for Title IV purposes = 6 credit hours.

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ISIR Received after PRD

If a student files a FAFSA form 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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ISIR Received After PRD

Example: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016.

David begins attendance as a full-time student in 12 credit hours but did not fill out a FAFSA form and is not currently eligible for Title IV aid. On September 2, 2016 David goes to FAFSA on the Web and on September 5, 2016, 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, his enrollment status for Pell = 12 credit hours.

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ISIR Received After PRD

Example: Crystal Clear College has a Fall term start of August 15, 2016 with a PRD of August 30, 2016.


Joe begins attendance as a full-time student in 12 credit hours but did not fill out a FAFSA form and is not currently eligible for Title IV aid. On September 10, 2016 Joe drops one 3-credit course.

On September 15, 2016 Joe goes to FAFSA on the Web and on September 17, 2016, the school receives an official ISIR for Joe.

At the time the school does an initial Pell calculation Joe is enrolled in 9 credit hours, 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 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

Crystal Clear College has a term start date of 8/15/16 and term end date of 12/15/15. The school has three different PRDs of 8/22/16, for Mod 1 courses, 9/1/16 for full-term courses and 10/23/16 for Mod 2 courses.

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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.

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PRDs and Modules

8/15/16 ← Full-Term Classes → 12/15/16

Mod 1 (8/15 – 10/15) Mod 2 (10/16 – 12/15)

PRD 8/22 PRD 9/1 PRD 10/23

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

STUDENTS **LOANS**

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Add/Drops and Direct Loans

- PRDs (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 verify 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 reestablishes ½ time status
- Repaid in accordance with terms/conditions of Pronote UNLESS required to return loan funds under R2T4 if student withdraws

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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

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When a Student is Considered Withdrawn

In the case of a non-term or nonstandard-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.

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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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Withdrawal Date

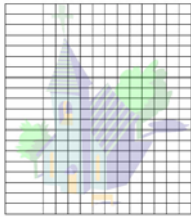
The goal of the Return provisions is to identify the date that most accurately reflects the point when a student ceases academic attendance, not the date that will maximize federal student aid to the institution or to the student.

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Schools Required to Take Attendance

Attendance Chart



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Institution 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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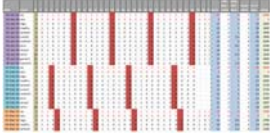
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Institution Required to Take Attendance

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



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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
- 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 CFR 668.22(c)(1)(iv)
 - If did not provide notification the withdrawal date is determined by the institution as to when circumstance occurred that caused the death
 - The withdrawal date can be no later than the date of the student’s death

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Withdrawal Date – Unofficial Withdrawals

- Midpoint of the payment period or period of enrollment
 - For all 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 academic 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 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
 - May develop a grading policy to assist with evaluation (F, U, FA, FW, etc...)



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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 (668.22(l)(3)(i))

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Date of Determination – Unofficial Withdrawals

<p><u>Attendance Required</u></p> <ul style="list-style-type: none"> • Cannot be more than 14 calendar days after Last Date of Attendance (LDA) 	<p><u>Attendance Not Required</u></p> <ul style="list-style-type: none"> • Within 30 calendar days from the earlier of <ul style="list-style-type: none"> – 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 (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 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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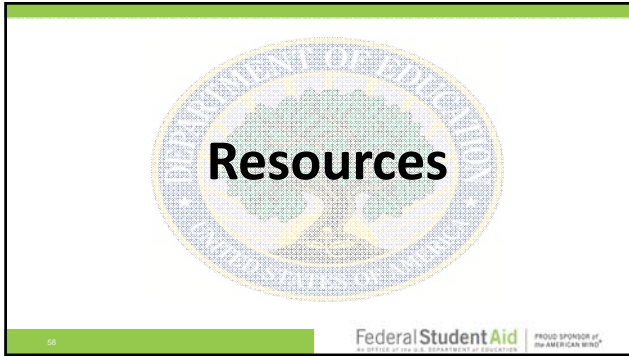
Late Enrollment Reporting

- A Late Reporting Notification will be sent to the school on the 22nd day if no updates are sent by the school after the roster file is sent
- Notification is sent to:
 - Enrollment Reporting Contact
 - Primary Contact
 - CEO / Campus President (copied)
- Schools are reminded that failure to comply with enrollment reporting requirements can result in loss of Title IV eligibility or may have fines imposed

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Resources

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Resources

Federal Student Aid Handbook

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

Federal Regulations – 34 CFR

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

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Department of Education Contacts

Research and Customer Care Center
800.433.7327
fsa.customer.support@ed.gov



Reach FSA
855.FSA.4FAA -- 1 number to reach 10 contact centers!

eZ-Audit Campus Based Call Center
COD School Eligibility Service Group
CPS/SAIG Foreign Schools Participation Division
NSLDS Research and Customer Care Center
G5 Nelnet Total & Permanent Disability Team

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Questions?

Contact me with follow-up questions about this session:
 Bruce Honer-Federal Training Officer
 bruce.honer@ed.gov; 415-486-5521



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Training Feedback

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- Go to <http://s.zoomerang.com/s/BruceHoner>
 - Evaluation form is specific to Bruce Honer
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to joann.borel@ed.gov; 936-201-3298

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