

Administering Adds, Drops and Withdrawals

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U.S. Department of Education

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Agenda

- Adds, Drops, and Pell Recalculation Overview
- Administering Multiple PRDs
- Add, Drops, and Direct Loans
- Withdrawal Definitions and Overview
- Withdrawals for Schools Required to Take Attendance
- Withdrawals for Schools Not Required to Take Attendance
- Other Withdrawal Date Considerations

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Adds, Drops and 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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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 provides 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 should 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 Ariel's Pell Eligible ISIR on August 5, 2016 and provides and 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 does not begin attendance in two of the classes and is considered half-time at the term start. The school should recalculate for half-time status since Ariel is ineligible for the initial full-time Pell originally calculated.

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If 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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If 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. Ben's enrollment status for Title IV purposes = 12 credit hours

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Withdraws Prior to PRD

When determining Title IV 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 through attendance prior to the withdrawal when calculating Title IV 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 Title IV 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. Sarah's enrollment status for Pell = 6 credit hours

Scott begins attendance on 8/15 with 6 credit hours, but adds 2 courses for a total of 6 credit hours on 9/1. Subsequently, she 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 there is an enrollment start after the established PRD, the school must use the enrollment status from the latter occurrence between a PRD and enrollment start date.

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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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Multiple Pell Recalculation Dates

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Multiple PRDs Within a Term

It is acceptable for a school to have multiple PRDs established throughout a single term

How multiple PRDs are administered depends on whether or not they are module specific

- Not module specific: Must recalculate the student's enrollment status at each PRD occurrence
- Module specific: Must recalculate the student's enrollment status only if the student begins attendance in a course intended for that module

In both instances, when PRD is active, all courses are considered when determining enrollment status

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Multiple PRDs - Not Module Specific

Crystal Clear College has a term start date of 8/15/16 and term end date of 12/15/16. The school has three different PRDs of 9/01/16, 10/1/16 and 11/1/16. None of these PRDs are module specific.

They offer full-term courses, and two module course. Module 1 starts on 8/15/16 and ends on 10/15/16. Module 2 starts on 10/16/16 and ends on 12/15/16.

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Multiple PRDs - Not Module Specific

Jesse is scheduled to attend 6 credits in full term, 3 credits in Mod 1 and 3 credits in Mod 2. He drops a class (3 credits) on 8/30 and never begins attendance for Mod 2 class. His enrollment status = 6 credits using PRD on 11/1.

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Multiple PRDs - Module Specific

Crystal Clear College has a term start date of 8/15/16 and term end date of 12/15/16. 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.

They offer full-term courses, and two module course. Module 1 starts on 8/15/16 and ends on 10/15/16. Module 2 starts on 10/16/16 and ends on 12/15/16.

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Multiple PRDs - Not Module Specific

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

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Multiple PRDs - Not Module Specific

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

Jesse is scheduled to attend 6 credits in full term, 3 credits in Mod 1 and 3 credits in Mod 2. He drops full-term class (3 credits) on 9/5 and never begins attendance in Mod 2. Since he 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, Drops, and Direct 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
- Schools that are not required to take attendance must have a process in place to determine if student meets eligibility requirements at the time of disbursement

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Early Disbursements

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

- If student begins attendance as less-than-half-time, the disbursement can be kept
 - Repaid in accordance with terms and conditions of the promissory note
 - Subsequent disbursements within the term cannot be made
- If student does not begin attendance must return any Direct Loan funds applied against the student's account
 - Any disbursement made directly to the student

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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.

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When a Student is Considered Withdrawn

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

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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
- Required attendance could be for an entire institution, department, or program.

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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
- Most credit hour institutions fit into this category
- If there is no formal policy to take attendance



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Withdrawal Date – Official Notification

- Official notification when following school’s withdrawal process
 - The date is the date the student begins the withdrawal process even if the student provides a future last date of attendance
 - School may use last date of attendance only if documentation is provided relating to a corresponding academically related activity

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Withdrawal Date – Official Notification

- Student otherwise provides official notification
 - May not follow process but provided in writing or orally to a designated campus official.
 - Withdrawal date is the date the school receives the notification
 - If orally, school must document when oral notification was given (school may request, but not require, notification in writing)
 - If written, the withdrawal date is the date the school receives the written letter or documentation

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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 - Midpoint

- 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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Academically Related Activity

- Academically related activity
 - School may use documented attendance at an academic related activity in lieu of any of the withdraw dates previously mentioned
 - School may use an earlier date than the academically related activity if believed to be a more accurate reflection of the withdrawal date
 - 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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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

| | |
|--|--|
| <p><u>Attendance Required</u></p> <ul style="list-style-type: none"> • Cannot be more than 14 calendar days after withdrawal date | <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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Other Withdrawal Date Considerations



Leave of Absence (LOA)

- A leave of absence (LOA), for Return of Title IV funds purposes, is a temporary interruption in a student's program of study
- LOA refers to the specific time period during a program when a student is not in attendance
- LOA must meet all of the conditions as defined in 34 CFR 668.22(d) for it not to be counted as a withdrawal



Leave of Absence (LOA)

- Conditions for an approved LOA
 - Formal written policy that student followed in requesting LOA
 - Reasonable expectation that student will return from LOA
 - School must approve LOA in accordance with its policy
 - No additional institutional charges may be assessed
 - For credit hour term-based programs, student must resume training at the same point of program when LOA began
 - Approved LOA may not exceed 180 days within a 12 month period
 - Loan recipients must be notified of effects on grace period if they do not return from LOA



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Failure to Return from an LOA

- Withdrawal date
 - At institution not required to take attendance is date LOA began
 - At institution required to take attendance is last date of attendance (LDA)



Student Fails to Earn a Passing Grade

- School must have a procedure to determine if student completed the period or should be treated as a withdrawal
- If student receives a passing grade for any course during the period, may presume completed the period for all courses
- If student does not receive a passing grade for any course during that period, must assume an unofficial withdrawal occurred





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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| | |
|-----------------|---|
| <i>eZ-Audit</i> | <i>Campus Based Call Center</i> |
| <i>COD</i> | <i>School Eligibility Service Group</i> |
| <i>CPS/SAIG</i> | <i>Foreign Schools Participation Division</i> |
| <i>NSLDS</i> | <i>Research and Customer Care Center</i> |
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Questions?

Contact me with follow-up questions about this session:
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- Additional feedback about training can be directed to joann.borel@ed.gov; 936-201-3298

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QUESTIONS?



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