

Lesson 2 - Determining the Student's Withdrawal Date

Objective

After completing this lesson learners will be able to:

- Determine a student's withdrawal date

Key Terms

Date of the Institution's Determination that the Student Withdrew

The point in time when a school could reasonably be expected to know that a student has withdrawn. The date of the institution's determination that the student withdrew is used in many circumstances, such as establishing the time frame for when the Return calculation must be completed and funds returned by the school.

Payment Period

A school-defined length of time for which a specific payment of Title IV aid is made available to a student. For programs using academic terms, a payment period is equal to a term. For programs not using academic terms, schools must designate at least two payment periods within an academic year, pursuant to all applicable regulations ([34 CFR 668.4](#)).

Period of Enrollment

The academic period established by the school for which institutional charges are generally assessed (for example, the length of the student's program or the academic year, but consistent with the period for which loans generally are certified, not to exceed twelve months).

Key Terms (continued)

Withdrawal Date

For schools required to take attendance, this is the last date the student attended a class as documented by attendance records, as described in [34 CFR 668.22 \(b\)](#).

For schools not required to take attendance, this is the date the student began the withdrawal process, otherwise provided official notification of the intention to withdraw, the date of circumstances beyond the student's control that prevented notification, the midpoint of the period (in the case of an unofficial withdrawal), or in the case of a student who does not return from an approved leave of absence, the date the student began—or school determined student began—a leave of absence, as described in [34 CFR 668.22 \(c\) i-vi](#), as applicable.

Additional clarification is provided in [GEN-04-03 \(revised November, 2004\)](#).

Schools Required to Take Attendance

Policy to determine withdrawal date

The goal of the Return of Title IV Aid provisions is to ensure that a student doesn't receive more aid than they earned through attendance. As a result, schools identify the date that most accurately reflects the date a student ceases academic attendance. Schools that are required to take attendance are expected to have policies and procedures in place for routinely monitoring attendance records to determine, in a timely manner, when a student withdraws. At a school required to take attendance, we expect that the date of the institution's determination that the student withdrew is no later than 14 days after the student's withdrawal date—the last date of academic attendance as determined by the institution from its attendance records (34 CFR 668.22(b)(1)).

Example of determining a withdrawal date

Ms. Sparks, an FAA for a school, notices on October 10 that a student has not been in attendance since October 1. Ms. Sparks contacts the student and learns that the student has been ill but plans to come back the next week (and this falls within the time period for excused absences and absences allowed by state, accrediting agency, and other applicable policies).

For the moment, the school may delay taking any action. If the student does not return by October 15, however, the school must complete a R2T4 calculation using:

- Student's last day of attendance: October 1
- Date of the Institution's Determination that the Student Withdrew: October 10

For this example, the school returns any unearned funds by what date? _____

The screenshot shows a web application interface for 'Return of Title IV Funds on the Web'. At the top, there are tabs for 'Post Withdrawal', 'Notes', and 'User Data'. Below these are sub-tabs for 'Overview', 'Demographics', and 'R2T4'. The main content area is titled 'Return of Title IV Fund Worksheet' and contains a form for 'Step 1: Student and School Title IV Aid Information'. The form fields are as follows:

| | |
|---|---------------------------------------|
| Name: | Amy K. Ordonez |
| Social Security Number: | 111-22-3333 |
| Award Year: | 2006 |
| School Calendar: | 06FA Calendar Profile |
| Is the school required to take attendance by an outside entity? | Select |
| Withdrawal Type: | Select |

Figure 1 - Return of Title IV Funds on the Web, choices for school's requirement to take attendance.

Note:



Review Dear Colleague Letters, like *GEN-06-05*, and other announcements for Higher Education Reconciliation Act of 2006 changes to student and institutional eligibility and student assistance general provisions.

Schools Not Required to Take Attendance

The student's withdrawal date is defined differently for schools that are not required by an outside entity to take attendance. The student's withdrawal date for these schools is defined in [34 CFR 668.22 \(c\) i-vi](#). Students can officially or unofficially withdraw, plus there are other factors that play a part in resolving the date of the institution's determination that the student withdrew.

Determining the withdrawal date for students who officially withdraw

Students who notify the school of their intention to withdraw are considered to withdraw officially, whether or not they follow a school's prescribed withdrawal process.

If a student follows the school's prescribed withdrawal process, the withdrawal date is the date, as determined by the school, that the student began the process.

If a student does not follow the school's prescribed withdrawal process, the withdrawal date is the date, as determined by the institution, that the student otherwise provided official notification to the school, in writing or orally, of his or her intent to withdraw.

Policy to determine withdrawal date for unofficial withdrawals

A school that is not required to take attendance must have policies and procedures for determining whether a Title IV aid recipient who began attendance during a period either completed the period or should be treated as a withdrawal. For those schools not required to take attendance, it is possible that some schools may not know that a student has unofficially withdrawn until the school checks its records at the end of an academic period.

A school must develop policies and procedures to determine whether a student who began attendance and received, or could have received, an initial disbursement of Title IV funds unofficially withdrew during a payment period or period of enrollment. Regulations require that a school have a mechanism in place for identifying and resolving instances where a student's attendance through the end of the period cannot be confirmed. The school must make that determination as soon as possible, but no later than 30 days after the end of the payment period or period of enrollment, the academic year, or the program, whichever is earliest.

A student who leaves a school does not always notify the school of the withdrawal. For purposes of the R2T4 calculation, these unofficial withdrawals fall into two categories:

- Category 1: Withdrawal without student notification due to circumstances beyond the student's control
- Category 2: All other withdrawals without student notification

Categories of unofficial withdrawals

Category 1: Withdrawal without student notification due to circumstances beyond student's control

If the school determines that a student (or second party on student's behalf) did not begin the withdrawal process or notify the school of the intent to withdraw due to illness, accident, grievous personal loss, or other circumstances beyond the student's control, the withdrawal date is the date the school determines from its consideration of circumstances. The student's withdrawal date is the date the school determines that the student ceased attendance because of the circumstance, not necessarily the date of the occurrence.

The screenshot shows a web application interface with several fields:

- Is the school required to take attendance by an outside entity?**: A dropdown menu with "No" selected.
- Withdrawal Type:**: A dropdown menu with "Select" as the current selection.
- Grade Level:**: A dropdown menu with "Select" as the current selection.
- Leave of absence days:**: A dropdown menu with a list of options:
 - 1 - Began official withdrawal process
 - 2 - Otherwise provided official notification (expressed intent)
 - 3 - Unofficial withdrawal (no notification)
 - 4 - Beyond the student's control (no notification) [highlighted]
 - 5 - Unapproved/doesn't return from a leave of absence
 - 6 - Last date of an academically-related activity
 - 7 - Required to take attendance/last date of attendance
- Date Form Completed:**: A text input field with the placeholder "Please enter".

Figure 2 – R2T4 Web application, selecting Withdrawal Type, 4 – Beyond the student's control (no notification)

A special rule applies where a school determines the date the student ceased academic attendance due to circumstances beyond the student's control, as described in [Federal Student Aid Handbook, Volume 5 Chapter 2](#). (Important: As Chapter 2 was being prepared, Congress passed legislation that might substantially alter the Return of Title IV Funds. Check for Dear Colleague Letters that the Department of Education will issue on ifap.ed.gov that address changes subsequent to the new legislation.)

Notes:



- Unless an outside entity has determined that an institution is required to take attendance, the institution is considered to be one that is not required to take attendance.
- Schools must develop policies and procedures to deal with unofficial withdrawals and must place withdrawal instructions in student consumer information.

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Categories of unofficial withdrawals (continued)

Category 2: All other withdrawals without student notification (unofficial withdrawals)

The second category of unofficial withdrawals encompasses all other withdrawals where official notification is not provided to the school. For these withdrawals, the withdrawal date is the midpoint of the payment period or period of enrollment.

Passing Grades vs. No Passing Grades

At least one passing grade

If a student earns a passing grade in at least one course offered over an entire period, the institution can assume that the student completed the course and, thus, completed the period. In this case, the provisions of 34 CFR 668.22 do not apply and therefore the school would not calculate the earned and unearned portion of Title IV aid.

No passing grades

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 school must assume that the student has unofficially withdrawn, unless the school can document that the student completed the period.

A school may be able to use its **academic grading policy** for awarding final grades to document that the student completed the period. This applies if the school has an official grading policy that differentiates between:

- Students who completed the course but failed to achieve the course objectives, and
- Students who did not complete the course

As a mechanism for determining unofficial withdrawal, this policy would help to determine whether a student who did not receive at least one passing grade nevertheless completed the period.

Later in this course, you will see a demonstration of creating an R2T4 record using R2T4 on the Web. Return calculations require knowing a student's Withdrawal Date. When using the Web application, you can select a Withdrawal Type of "3 – Unofficial Withdrawal (no notification)." If you plan to select Withdrawal Type 3 but you do not know the actual Withdrawal Date, you must still provide an approximate Withdrawal Date so the return calculation is performed correctly and includes the appropriate funds. This concept will be revisited in Lesson 4.

Note:



Compliance audits and program reviews may examine whether a school accurately assigns failing grades to students if the school uses its grading policy to determine whether a student with failing grades has unofficially withdrawn.

Using the Date of an Academically Related Activity as Student's Withdrawal Date

A school that is not required to take attendance may use a student's last date of attendance at an academically-related activity as the student's withdrawal date, as documented by the school.

If a student begins the school's withdrawal process or provides official notification of the intent to withdraw and then attends an academically related activity after that date the school can document, the school has the option of using either date as the student's withdrawal date.

Conversely, a school could choose to use an earlier date if it believes the last documented date of attendance at an academically related activity more accurately reflects the student's withdrawal date than the date on which the student began the school's withdrawal process.

The screenshot shows a web form with several fields. The first field is 'Is the school required to take attendance by an outside entity?' with a dropdown menu set to 'No'. Below it is the 'Withdrawal Type:' dropdown menu, which is open and shows a list of options. Option 6, 'Last date of an academically-related activity', is highlighted in blue. Other options include '1 - Began official withdrawal process', '2 - Otherwise provided official notification (expressed intent)', '3 - Unofficial withdrawal (no notification)', '4 - Beyond the student's control (no notification)', '5 - Unapproved/doesn't return from a leave of absence', and '7 - Required to take attendance/last date of attendance'. There are also fields for 'Grade Level:', 'Leave of absence days:', and 'Date Form Completed:'.

Figure 2 - R2T4 on the Web, selecting Withdrawal Type - Last date of an academically related activity.

Some examples of academically-related activities include:

- Examinations or quizzes
- Tutorials
- Computer-assisted instruction
- Academic advising or counseling
- Completing an academic assignment, paper, or project
- Attend a school-assigned study group where attendance is taken

Exception for Schools Not Required to Take Attendance: Specific Programs or Distinct Cohorts of Students that Require Attendance to be Taken

A school that is generally not required by an outside entity to take attendance may have specific programs or distinct cohorts of students for which an outside entity requires the school to take attendance. If so, for students either attending a specific program or belonging to a distinct cohort for whom the school is required to take attendance, the withdrawal date is determined from attendance records, as defined in [CFR 668.22 \(b\)](#). When calculating returns for these students only, the school is considered to be required to take attendance.

