

Lesson 2– Determining the Student’s Withdrawal Date

 **Time: 20 minutes**

Host

Open Slide Show: R2T4 Lesson 2.ppt

Display Slides 1 and 2

Presenter

Briefly introduce Lesson 2.

Learning Objective:

After completing this lesson, you will be able to:

- Determine a student’s withdrawal date

Determining a withdrawal date depends on whether a school is required to take attendance.



This lesson covers in detail the differences of each type of school (whether they are required to take attendance) and situations when a school is required to take attendance.



Point out the Key Terms defined on pages 2-1 and 2-2 (also found in Appendix A). Remind learners that they can access the Code of Federal Regulations (CFR) online through www.ifap.ed.gov. References to the relevant sections of 34 CFR 668 are provided throughout this lesson.

Host

Display Slide 3 Poll: Is your school required by an outside entity to take attendance?

Leave the Display Results on to display cumulative answers to participants as the questions are completed.

Ask participants to vote “Yes” or “No” to indicate whether their school is required by an outside entity to take attendance.



Refer to Participant’s Workbook (PW) page 2-3.

Close the Poll.

Display Slide 4: Schools Required to Take Attendance



Presenter

A “school required to take attendance” is one where an outside entity (for example, an accrediting body or a state education department) requires that the school take attendance for some or all of its students.

Schools required to take attendance are required to have policies and procedures in place to monitor attendance records to determine when a student withdraws.

- The last date of attendance, as documented in school attendance records, is the student’s date of withdrawal
- Attendance records provide the most precise withdrawal date

Note: schools [that are required to take attendance](#) have a maximum of 14 days to make a determination *that the student withdrew* (GEN-04-12). Schools use the *date of the institution’s determination that the student withdrew* to establish when a return calculation must be completed and unearned funds are returned by the school.



Refer to PW page 2-3.

Point out the R2T4 on the Web screen capture: When using R2T4 on the Web, You will select whether your school is required to take attendance or not.

Display Slide 5: Determining Withdrawal Date

Let’s walk through an example of determining a student’s date of withdrawal from a school required to take attendance:

A financial aid administrator (FAA) notices on September 10 that a student has not been in attendance since September 1. The FAA contacts the student and learns that the student has been ill but plans to come back 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. However, if the student does not return by September 15, the school must complete a Return of Title IV Aid calculation using September 1 as the student’s last day of attendance, and September 15 as the date of the institution’s determination that the student withdrew. The school must return any unearned funds by October 30.

- September 1 as the student’s date of withdrawal and
- September 15 as the date the school determined the student withdrew

If an institution follows a policy that states when absences will be treated as withdrawals, the date of determination would be no later than the date specified in the policy, as long as that date is not later than 14 days after the student’s withdrawal date.

Remember, schools have a maximum of 45 days from the date of the school’s determination that the student withdrew to return any unearned funds.

Host

Display Slide 6 Poll: For this example, the school returns any unearned funds by what date? Ask participants to select one of the answers “October 14” or “October 30” or “November 14” or “November 24” or “November 30.”

Leave the Display Results on to display cumulative answers to participants as the questions are completed.

(Answer: October 30th, 45 days after the Date of the Institution’s Determination that the Student Withdrew; see DCL GEN-06-05)

Close the Poll.



Point out the note at the bottom of PW page 2-3.

- 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.

Display Slide 7: Schools Not Required to Take Attendance



Refer to PW page 2-4.

Presenter



Unless an outside entity has determined that a school is required to take attendance, the school is considered one that is **NOT REQUIRED** to take attendance.


Policies and procedures must be set at all institutions to determine the withdrawal date for a student who began attendance but did not provide official notification of withdrawal or intent to withdraw.

Schools must develop policies and procedures to deal with unofficial withdrawals and must place withdrawal instructions in student consumer information.

There are two categories of typical unofficial withdrawals:

- Category 1: Withdrawal due to hardship (illness or accident) or circumstances beyond student’s control
 - Date determined by school
- Category 2: Withdrawals not associated with hardship, all other withdrawals and unofficial withdrawals
 - Midpoint of period or date determined by school

Refer to PW page 2-5.



Point out the R2T4 Web application screen capture: when using the R2T4 Web application, The user has the option of selecting the Withdrawal Type. Point out that you will demonstrate adding a new R2T4 record in Lesson 4 using the R2T4 Web application.

A Category 1 withdrawal:

- Can happen due to unforeseen circumstances
- The date of actual withdrawal could be related to the circumstance, but not necessarily the actual date of the circumstance

For example, a student was involved in a serious automobile accident on February 3rd. After being released from the hospital on February 15th, the student resumed taking classes. After attempting to study, the student realized that he/she could not concentrate sufficiently, because of the accident and stopped attending on February 19th. Since the student's withdrawal was related to circumstances beyond their control, the school may determine the student's withdrawal date to be the date of the accident.

A Category 2 withdrawal:




- For all other unofficial withdrawals. If a date cannot be determined, the date of withdrawal is the midpoint of the payment period or the period of enrollment

Schools are required to make a decision about a student's withdrawal date as soon as possible, but no later than 30 days after the earliest of one of the following:

- End of payment period or period of enrollment
- End of academic year, or
- End of program

Point out that Lesson 4 will show a demonstration of creating an R2T4 record for a student and the following will be revisited:

- All return calculations require a Withdrawal Date
- When using the Web application to calculate Returns, you can select a Withdrawal Type of "3 – Unofficial Withdrawal (no notification)"
- If you plan to select Withdrawal Type 3 but do not know the student's actual Withdrawal Date, you must provide an approximate Withdrawal Date as described in Categories 1 & 2. This ensures that the return calculation is performed correctly and includes the appropriate funds



Point out the notes on page 2-5 of the PW. *Unless required by an outside entity to take attendance, the institution is considered to be one that is NOT required to take attendance. And, Schools must develop policies and procedure to deal with unofficial withdrawals and must place withdrawal instructions in student consumer information.*

Host

Display Slide 8: Schools Not Required to Take Attendance



Refer to PW page 2-6.

Presenter - Passing Grades versus No Passing Grades



An institution must have a procedure for determining whether a Title IV aid recipient who began attendance during a period completed the period or should be treated as a withdrawal.

At least one passing grade

If a student earns a passing grade in at least one course offered over an entire period, the institution may make the presumption that the student completed the course and, thus, completed the period.

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 institution must assume, for Title IV purposes, that the student has unofficially withdrawn, unless the institution can document that the student completed the period.

DCL GEN-04-03 provides examples of academic grading policies and how they can relate to determining the last date of attendance. One suggestion is change letter grades as follows:

- An “earned F” is assigned to a student who fails to successfully complete required course objectives at a satisfactory level of achievement
- An Example of other grades that could be assigned: “WF” (withdrawal failed) or “U” (unauthorized incomplete) is assigned for non-participation, and
- An institution may require instructors to report a student’s last day of attendance for those assigned a non-passing grade

Note: If a student failed to establish eligibility because he or she did not begin class attendance, the provisions of R2T4 do not apply because the student has never established eligibility; therefore, all Title IV funds must be returned.

Point out the note on page 2-6 in the PW:

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

Host

Display Slide 9: Schools Not Required to Take Attendance



Refer to PW page 2-7. **Using the Date of Academically-Related Activity as Withdrawal Date.**

Presenter



Schools may use a documented date of attendance at an academically related activity as the student's withdrawal date. A list of examples of an academically related activity is provided for you in your participant workbook.

If student provides official notification and then attends an academically-related activity, school has a choice of these two dates.

School should choose date that most accurately reflects student's withdrawal date

Host

Display Slide 10 Poll: Documentation of a student's attendance at an academically related activity

Leave the Display Results on to display cumulative answers to participants as the questions are completed.

Presenter



Ask participants to vote "Yes" or "No" to the statement: **Documentation of a student's attendance at an academically related activity can be provided by the student. A student's self-certification of attendance at an academically related activity can be sufficient documentation.**

Answer: NO. The school, not the student, must document that the activity is academically related and that the student attended the activity.

Exception for Schools Not Required to Take Attendance: Although the institution is not required to take attendance, they may have specific programs or distinct cohorts of students for which an outside entity requires the school to take attendance. When calculating the return calculation for these students only, the school is considered to be required to take attendance

Host

Display Slide 11: Business Process Worksheet



Refer to PW Page 2-8.

Presenter



Take a look at the Business Process Worksheet (Appendix B). Step 4 provides the action items discussed in this lesson for you to determine your school's withdrawal date.

Host

Display Slide 12: Discussion Questions

Presenter



Ask Participants: If you are from a school that is not required to take attendance, use your text tool to share methods you have used to determine the withdrawal date for unofficial withdrawals.

Ask Participants: What strategies have you seen that worked at your institution for contacting faculty about documenting academically related activities?

- Remind participants that schools can develop methods to exchange information (between people and offices, ultimately reaching the person(s) responsible for administering Title IV, HEA programs) that bears on a student's eligibility to receive funds (34 CFR 668.16(a)(3))
- This exchange of information may enable a student to retain Title IV funds received based on a last date of attendance rather than the midpoint (payment period or period of enrollment)