



# RT24

## Withdrawal Dates and Post-Withdrawal Disbursements

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# Withdrawal Dates

# When a Student is Considered Withdrawn

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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.



# When a Student is Considered Withdrawn

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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.

# When a Student is Considered Withdrawn

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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.

# When a Student is Considered Withdrawn

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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.



# Withdrawal Date

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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.



# Schools Required to Take Attendance



# Institution Required to Take Attendance

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- 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

# Institution Required to Take Attendance

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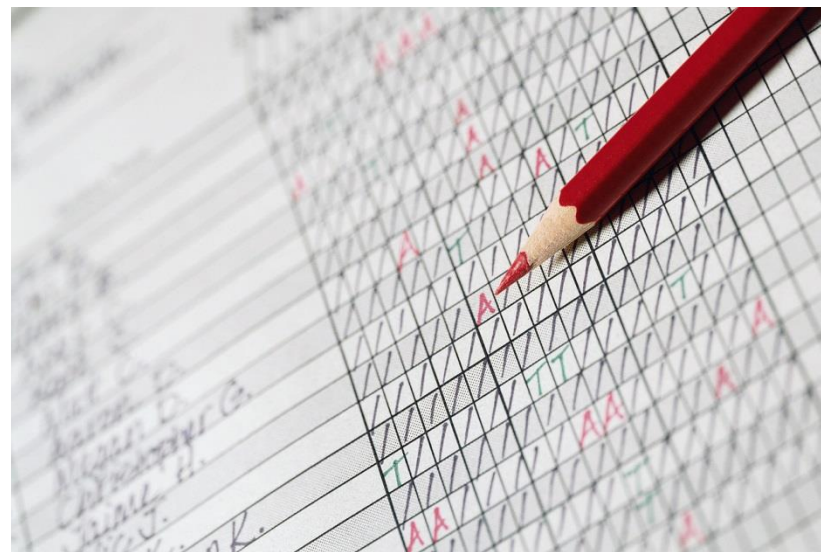
- Must use its official attendance records to determine withdrawal date (WD)
- Last date of attendance must be the withdrawal date



# Schools Not Required to Take Attendance

# Institutions Not Required to Take Attendance

- Not required to take attendance by an outside entity
- Most credit hour institutions fit into this category



# Withdrawal Date – Official Notification

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- 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

# Withdrawal Date – Official Notification

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- 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

# Withdrawal Date – Special Circumstances

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- 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.

# Withdrawal Date – Student Dies

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- 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



# Withdrawal Date - Midpoint

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- 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.

# Withdrawal Date – Academically Related Activity

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- 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

# Withdrawal Date – Academically Related Activity

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- 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

# Withdrawal Date – Academically Related Activity

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- 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



# Date of Determination

# Date of Determination

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- 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))

# Date of Determination

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## Attendance Required

- Cannot be more than 14 calendar days after withdrawal date

## 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



# Other Withdrawal Date Considerations



# Leave of Absence (LOA)

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- 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

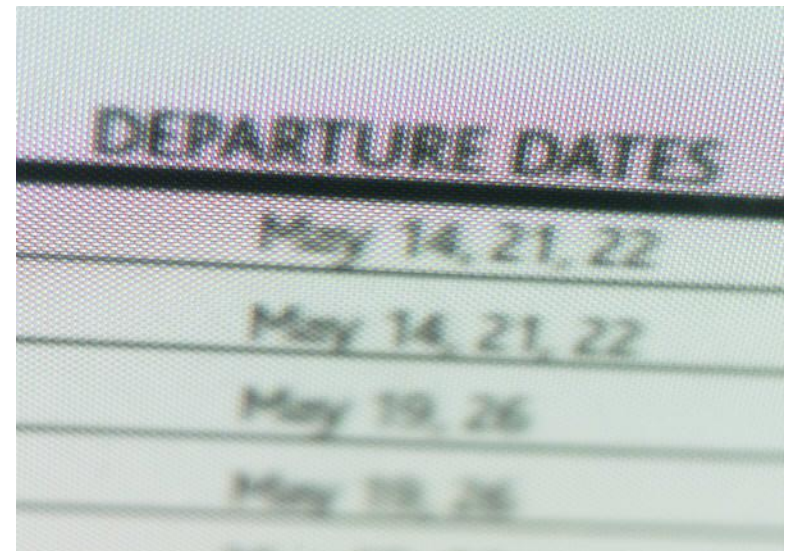
# Leave of Absence (LOA)

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- 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
  - 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

# 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)



The image shows a close-up of a document with the heading "DEPARTURE DATES". Below the heading is a table with four rows of dates. The text is slightly blurred but the dates are clearly legible.

DEPARTURE DATES
May 14, 21, 22
May 14, 21, 22
May 19, 26
May 19, 26

# Student Fails to Earn a Passing Grade

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- 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



# Post-Withdrawal Disbursements

# Defining Post-Withdrawal Disbursement

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If the student receives less federal student aid than the amount earned, the school must offer a disbursement of the earned aid that was not received. This is called a post-withdrawal disbursement.

# Determining Aid Earned

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- A student earns aid equal to percentage of payment period or payment period or period of enrollment completed.

## *Programs measured in credit hours*

$\frac{\text{\# of days in attendance}}{\text{\# of days in PP or POE}} = \% \text{ of TIV aid earned}$

## *Programs measured in clock hours*

$\frac{\text{\# of scheduled clock hours}}{\text{\# of clock hours in PP or POE}} = \% \text{ of TIV aid earned}$

# Post-withdrawal Disbursements

Aid to be Earned = Combined sum of Disbursed Aid and Aid that Could Have Been Disbursed (Box G)

STEP 1: Student's Title IV Aid Information			
<b>Title IV Grant Programs</b>		Amount Disbursed	Amount that Could Have Been Disbursed
1. Pell Grant		2000	
2. Academic Competitiveness Grant			
3. National SMART Grant			
4. FSEOG			
5. TEACH Grant			
6. Iraq Afghanistan Service Grant			
	<b>A.</b>	2000	<b>C.</b>
		Subtotal	Subtotal
<b>Title IV Loan Programs</b>		Net Amount Disbursed	Net Amount that Could Have Been Disbursed
7. Unsubsidized FFEL/Direct Stafford Loan			1732
8. Subsidized FFEL/Direct Stafford Loan			990
9. Perkins Loan			
10. FFEL/Direct PLUS (Graduate Student)			
11. FFEL/Direct PLUS (Parent)			
	<b>B.</b>	00000	<b>D.</b>
		Subtotal	Subtotal
<b>E. Total Title IV aid disbursed for the period.</b>			
	<b>A.</b>	2000	
	<b>B.</b>	0	
	<b>E.</b>	\$ 2000 .	
<b>F. Total Title IV grant aid disbursed and that could have been disbursed for the period.</b>			
	<b>A.</b>	2000	
	<b>C.</b>	0	
	<b>F.</b>	\$ 2000 .	
<b>G. Total Title IV aid disbursed and that could have been disbursed for the period.</b>			
	<b>A.</b>	2000	
	<b>B.</b>	0	
	<b>C.</b>	0	
	<b>D.</b>	2722	
	<b>G.</b>	\$ 4722 .	



# Aid that Could Have Been Disbursed

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- Aid that could have been disbursed included in R2T4 calculation if
  - Conditions for late disbursements were met prior to withdrawal date
    - ED processed ISIR/SAR with an official EFC
    - Perkins/FSEOG – school made award
    - Direct Loan – school originated loan
    - TEACH – school originated grant

# Aid that Could Have Been Disbursed

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Include the following as “aid that could have been disbursed” but cannot be PWD:

- a second or subsequent disbursement of Direct Loan funds unless the student has graduated or successfully completed the loan period (34 CFR 668.164(g)(4)(ii))
- disbursement of Direct Loan or Perkins Loan funds for which the borrower has not signed a promissory note
- a disbursement of a Direct Loan to a first-year, first-time borrower who withdraws before the 30th day of the student’s program of study (34 CFR 668.164(g)(4)(iii))

# Post-Withdrawal Disbursement

- When the federal student aid earned is greater than the federal student aid disbursed, the school must offer a disbursement of the remaining earned aid that can be disbursed.

STEP 4: Title IV Aid to be Disbursed or Returned			
▶	<i>If the amount in Box I is greater than the amount in Box E, go to Item J (Post-withdrawal disbursement).</i>		
▶	<i>If the amount in Box I is less than the amount in Box E, go to Title IV aid to be returned (Item K).</i>		
▶	<i>If the amounts in Box I and Box E are equal, <b>STOP</b>. No further action is necessary.</i>		
<b>J. Post-withdrawal disbursement</b>			
From the Amount of Title IV aid earned by the student (Box I) subtract the Total Title IV aid disbursed for the period (Box E). This is the amount of the post-withdrawal disbursement.			
3000 <small>Box I</small>	—	2000 <small>Box E</small>	= <b>J. \$</b> 1000 .
<b>Stop here</b> , and enter the amount in "J" in Box 1 on Page 3 (Post-withdrawal disbursement tracking sheet).			
<i>Step 4 continued ▶</i>			

# Notification of PWD

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- School must provide written notification within 30 days of date of determination of withdrawal
  - Must identify type and amount of funds
  - Must explain option to accept or decline some or all of funds
  - Must explain obligation to repay any loan funds disbursed
  - Must provide a deadline for response (must be at least 14 days)

# Post-Withdrawal Disbursement of Grant Funds

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- No student confirmation required
- Disbursed directly to student - as soon as possible, but no later than 45 calendar days after date of determination
- Disbursed as credit to account – within 180 days after date of determination

# Post-Withdrawal Disbursement of Loan Funds

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- Must receive confirmation from the student or parent borrower prior to disbursement
- If confirmation received after the deadline, the school may or may not disburse
  - If not disbursed, school must notify the borrow in writing of the outcome
- Must be made as soon as possible, but no later than 180 days after date of determination

# Applying PWD to Institutional Charges

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- Grant funds may be applied directly to those charges without student's authorization
- Loan funds may only be applied after confirmation is received from the student/parent borrower
  - Written notification procedures are same as for direct disbursement

# PWD Tracking Sheet

POST-WITHDRAWAL DISBURSEMENT TRACKING SHEET					
Student's Name	<input type="text" value="Max Sharp"/>	Social Security Number	<input type="text" value="xxx-xx-xxxx"/>		
Date of school's determination that student withdrew	<input type="text" value="12 / 21 / 2014"/>				
<b>I. Amount of Post-withdrawal Disbursement (PWD)</b>					
Amount from "Box J" of the Treatment of Title IV Funds When a Student Withdraws worksheet	Box 1	<input type="text" value="\$ 1000 ."/>			
<b>II. Outstanding Charges For Educationally Related Expenses Remaining On Student's Account</b>					
Total Outstanding Charges Scheduled to be Paid from PWD (Note: Prior-year charges cannot exceed \$200.)	Box 2	<input type="text" value="\$ 0 ."/>			
<b>III. Post-withdrawal Disbursement Offered Directly to Student and/or Parent</b>					
From the total Post-withdrawal Disbursement due (Box 1), subtract the Post-withdrawal Disbursement to be credited to the student's account (Box 2) . This is the amount you must make to the student (grant) or offer to the student or parent (Loan) as a Direct Disbursement.					
<input type="text" value="\$ 1000 ."/>	—	<input type="text" value="\$ 0 ."/>	=	Box 3	<input type="text" value="\$ 1000 ."/>
Box 1		Box 2			



# PWD Tracking Sheet

IV. Allocation of Post-withdrawal Disbursement						
Type of Aid	Loan Amount School Seeks to Credit to Account	Loan Amount Authorized to Credit to Account	Title IV Aid Credited to Account	Loan Amount Offered as Direct Disbursement	Loan Amount Accepted as Direct Disbursement	Title IV Aid Disbursed Directly to Student
Pell Grant	N/A	N/A		N/A	N/A	
ACG	N/A	N/A		N/A	N/A	
National SMART Grant	N/A	N/A		N/A	N/A	
FSEOG	N/A	N/A		N/A	N/A	
TEACH Grant	N/A	N/A		N/A	N/A	
Iraq Afghanistan Svc. Grant	N/A	N/A		N/A	N/A	
Perkins						
Subsidized FFEL / Direct						1000.00
Unsubsidized FFEL / Direct						
FFEL / Direct Grad Plus						
FFEL / Direct Parent Plus						
<b>Totals</b>						1000.00

# PWD Tracking Sheet

V. Authorizations and Notifications			
Post-withdrawal disbursement loan notification sent to student and/or parent on			01 / 05 / 15
Deadline for student and/or parent to respond		02 / 05 / 15	
<input checked="" type="checkbox"/> Response received from student and/or parent on		01 / 21 / 15	<input type="checkbox"/> Response not received
<input type="checkbox"/> School does not accept late response			
VI. Date Funds Sent			
Date Direct Disbursement mailed or transferred	Grant	/ /	Loan 02 / 01 / 15



# Resources

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## Federal Student Aid Handbook

Volume 2, Chapter 3

Volume 4, Chapter 4

Volume 5

## Federal Regulations – 34 CFR

668.22 Return of Title IV Funds

668.22(I)(3)(i) Date of Determination

668.22(I)(3)(i) Notification of Withdrawal

668.164(g)(4)(ii) Post-withdrawal Disbursement

# Resources Continued

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R2T4 Program Integrity Q&As:

<http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/return.html>

R2T4 Recorded Training:

<http://ifap.ed.gov/dpcletters/ANN1227.html>

R2T4 Assessment:

<http://ifap.ed.gov/qahome/qaassessments/returntivfunds.html>

# Need Help?

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## Research and Customer Care Center

800.433.7327

[fsa.customer.support@ed.gov](mailto:fsa.customer.support@ed.gov)



## Reach FSA

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

*Campus Based Call Center*

*COD*

*CPS/SAIG*

*NSLDS*

*G5*

*eZ-Audit*

*School Eligibility Service Group*

*Foreign Schools Participation Division*

*Research and Customer Care Center*

*Nelnet Total & Permanent Disability Team*

# Training Feedback

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To ensure quality training we ask all participants to please fill out an online session evaluation

<https://s.zoomerang.com/s/KevinCampbell-TX>

- Survey feedback is a tool to help us improve our training, justify training/travel expenditures and to listen to our customers

Please provide any comments regarding this training or the trainer to:

Jo Ann Borel, Title IV Training Supervisor      [joann.borel@ed.gov](mailto:joann.borel@ed.gov)

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# Thank You, SWASFAA!

