

ADDS, DROPS, AND WITHDRAWALS

2025 TCU Conference

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U.S. Department of Education
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AGENDA

- 1. Adds, Drops, and Federal Pell Grant Recalculation
- 2. Modules and Federal Pell Grant Recalculation
- 3. Withdrawals
- 4. Resources

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ADDS, DROPS, AND FEDERAL PELL GRANT RECALCULATION

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REQUIRED PELL GRANT RECALCULATIONS

1

Change in Student Aid Index (SAI) or other Pell Eligibility Indicators

2

Change in enrollment intensity between academic terms

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Change in enrollment intensity when student does not begin attendance in all classes

[34 CFR § 690.80](#)

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REQUIRED PELL GRANT RECALCULATION – CLOCK HOURS

EARLY GRADUATION FROM CLOCK-HOUR PROGRAM

- Early graduation shortens length of program
- Must recalculate student’s Pell Grant based on clock hours completed

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OPTIONAL PELL GRANT RECALCULATIONS

- Change in enrollment intensity after student begins attendance in all credit hours
- Applies only to term-based credit-hour programs
- Institution may set Pell Grant Recalculation Date (PRD)
- PRD may be same or different date than institution’s “census” or “add/drop” date
- Describe PRD clearly in consumer information and internal procedures



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PELL GRANT RECALCULATION OPTIONS

- Enrollment intensity changes anytime within term (up or down)
- Based on enrollment intensity as of single fixed date (PRD)
- Based on enrollment intensity as of last modular course within term
 - Multiple PRDs for term
 - Only one PRD applies to student within term

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EXAMPLE 1 – ADD OR DROP BEFORE PRD

Fall term start date begins August 26th
Full time defined as 12 credit hours
PRD is September 6th

JOANNA

- Begins term attendance with 6 credit hours
- Adds 3 credit hours on 9/3
- 75% Pell Grant enrollment intensity

BEN

- Begins term attendance with 12 credit hours
- Drops 6 credits on 9/4
- 50% Pell Grant enrollment intensity

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EXAMPLE 2 – ADD OR DROP AFTER PRD

Fall term start date begins August 26th

Full time defined as 12 credit hours

PRD is September 6th

SARA

- Begins term attendance with 6 credit hours
- Adds 3 credit hours on 9/9
- 50% Pell Grant enrollment intensity

JOSHUA

- Begins term attendance with 12 credit hours
- Drops 6 credits on 9/9
- 100% Pell Grant enrollment intensity

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WITHDRAWALS AND PRD

Determining Pell Grant eligibility when a student withdraws

Institution must use the enrollment intensity established on the *earliest* of the date of withdrawal or the PRD.

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EXAMPLES – WITHDRAWALS AND PRD

Fall term start date begins August 26th

Full time defined as 12 credit hours

PRD is September 6th

ANITA

- Begins term attendance with 6 credit hours
- Withdraws on 9/3
- 50% Pell Grant enrollment intensity

MICHELLE

- Begins term attendance with 6 credit hours
- Drops 3 credit hours on 8/30
- Withdraws on 9/6
- 25% Pell Grant enrollment intensity

DAVID

- Begins term attendance with 6 credit hours
- Adds 6 credits on 9/16
- Withdraws on 10/11
- 50% Pell Grant enrollment intensity

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INITIAL PELL GRANT CALCULATION

- Student’s first Pell Grant calculation
- Made on or after date institution receives ED-produced SAI and Pell Eligibility Flag of “Y”


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INITIAL PELL GRANT CALCULATION (continued)

- Calculate Pell Grant using student’s enrollment intensity as of initial calculation
- Document each student’s initial Pell Grant calculation date
- May occur before enrollment
- May occur before or after PRD



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EXAMPLE 1 – INITIAL ENROLLMENT AFTER PRD

Fall term start date begins August 26th
Module 1 begins September 30th
Full time defined as 12 credit hours
PRD is September 6th

PAMELA

- Enrolls after start of term
- Registers for Modules 1 and 2 (3 credit hours each) on 9/9
- 50% Pell Grant enrollment intensity

DANIEL

- Enrolls after start of term
- Registers for 6 credit hours in Module 1, and 3 credit hours for Module 2 on 9/23
- 75% Pell Grant enrollment intensity

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EXAMPLE 2 – INITIAL ISIR RECEIVED AFTER PRD

Fall term start date begins August 26th

Full time defined as 12 credit hours

PRD is September 6th

JOSÉ

- Begins term attendance with 6 credit hours
- Adds 6 credit hours on 9/9
- Files FAFSA® form on 9/13
- School receives official ISIR on 9/16
- 100% Pell Grant enrollment intensity

MATT

- Begins term attendance with 12 credit hours
- Drops 3 credit hours on 9/25
- Files FAFSA® form on 9/27
- School receives official ISIR on 9/30
- 75% Pell Grant enrollment intensity

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MODULES AND
FEDERAL PELL GRANT
RECALCULATION

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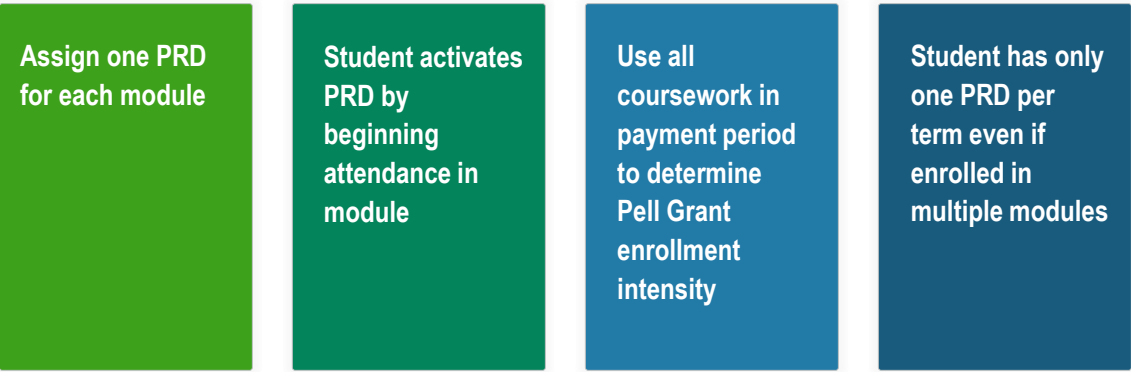
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MODULES AND MULTIPLE PRD

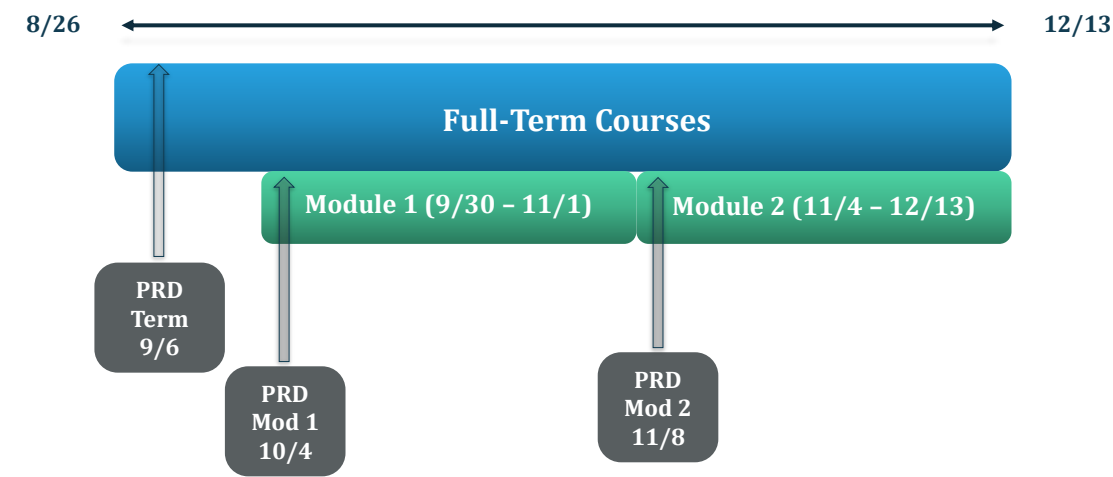
Assigning multiple Pell Grant Recalculation Dates is optional.



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EXAMPLE 1 – MODULES AND MULTIPLE PRD



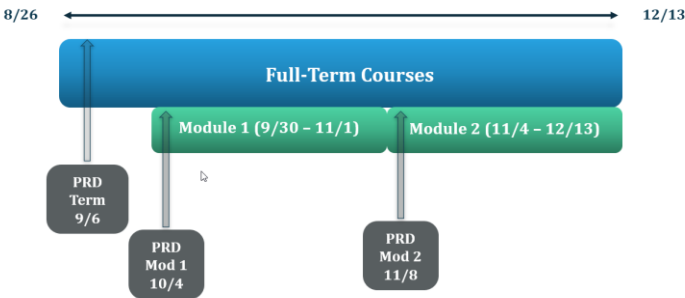
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STUDENT 1 – MODULES AND MULTIPLE PRD

Jessica

- Enrolls for fall term
Full term: two courses (6 credits)
Module 1: one course (3 credits)
Module 2: one course (3 credits)
- Drops one full-term course on 9/7
- Completes Module 1
- Begins Module 2
- Drops Module 2 course on 11/7
- 50% Pell Grant enrollment intensity



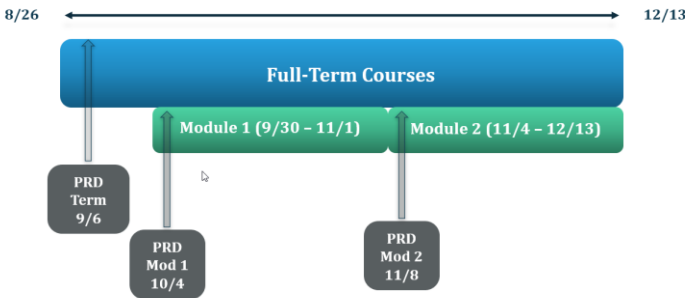
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STUDENT 2 – MODULES AND MULTIPLE PRD

Tracy

- Enrolls for fall term
Full term: two courses (6 credits)
Module 1: one course (3 credits)
Module 2: one course (3 credits)
- Drops one full-term course on 10/15
- Completes Module 1
- Never begins Module 2
- 75% Pell Grant enrollment intensity



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WITHDRAWALS

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WITHDRAWN STUDENT

Regulatory definition

34 CFR § 668.22(a)(2)(i)

(A) Credit-hour program

- Fails to complete **all scheduled days** in payment period or period of enrollment

(B) Clock-hour program

- Fails to complete **all scheduled clock hours and weeks of instructional time** in payment period or period of enrollment

*****If the student does not meet any withdrawal exemptions*****

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WITHDRAWN STUDENT

Regulatory definitions

34 CFR § 668.22(a)(2)(i)

- (C) Standard term or nonstandard-term program
- Not scheduled to begin another course within same payment period or period of enrollment *for more than 45 days* after end of module student ceased attending
 - Not withdrawn if on approved leave of absence

WITHDRAWN STUDENT

Regulatory definitions

34 CFR § 668.22(a)(2)(i)

- (D) Non-term or subscription-based program
- Cannot resume attendance within payment period or period of enrollment *for more than 60 days* after student ceased attending
 - Not applicable if on approved leave of absence

WITHDRAWN STUDENT – Q&A

- Q.** What if the student **ceases attendance in all Title IV-eligible courses** in payment period or period of enrollment, but stays enrolled in non-Title IV eligible courses?
- A.** The student is a withdrawal for Title IV purposes.



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WITHDRAWAL EXEMPTIONS


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EARLY GRADUATION

All programs

34 CFR § 668.22(a)(2)(ii)(A)

(1) Completes all program requirements for graduation before completing scheduled days or clock hours in period




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MODULES — SUCCESSFULLY COMPLETES 49%

34 CFR § 668.22(a)(2)(ii)(A)(2)

i. and ii. Successfully completes one or more modules comprising 49% or more of number of days in payment period

- Excludes scheduled breaks of five or more consecutive days
- Excludes all days between modules
- May not round up to 49%



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MODULES — SUCCESSFULLY COMPLETES HALF TIME

34 CFR § 668.22(a)(2)(ii)(A)(2)

iii. Successfully completes at least half-time enrollment per institution’s definition



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WRITTEN CONFIRMATION OF
FUTURE ATTENDANCE

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- i. Written confirmation that student will begin future module in same period
- ii. Module begins no later than 45 days after end of module student ceased attending in standard and nonstandard-term program



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Subscription-based and non-term

- Written confirmation that student will resume attendance in same period
- Date student returns no later than 60 days after student ceased attending



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WITHDRAWAL DETERMINATIONS AND PRINCIPLES

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INSTITUTIONS REQUIRED TO TAKE ATTENDANCE

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REQUIRED TO TAKE ATTENDANCE

When is an institution considered “required to take attendance”?

Outside entity
requires
institution to take
attendance

Institution
requires
instructors to take
attendance

Institution or
outside entity
requirement is met
only by taking
attendance

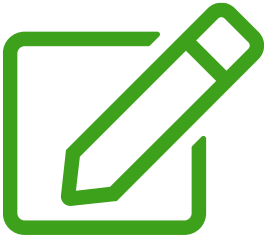
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REQUIRED TO TAKE ATTENDANCE

STUDENT'S WITHDRAWAL DATE

- *Always* last date of academic attendance
- Determined by institution’s attendance records
- Includes students not returning from leave of absence



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INSTITUTIONS NOT REQUIRED TO TAKE ATTENDANCE

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NOT REQUIRED TO TAKE ATTENDANCE

INSTITUTION *NOT* REQUIRED TO TAKE ATTENDANCE IF –

- Attendance not required by outside entity
- No formal institutional attendance policy
- No institution or outside entity requirement only met by taking attendance (or comparable process)

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NOT REQUIRED TO TAKE ATTENDANCE

INSTITUTION *NOT* REQUIRED TO TAKE ATTENDANCE IF FACULTY –

- Voluntarily take attendance
- Provide last date of attendance for students with all “F” grades to determine unofficial withdrawals

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WITHDRAWAL DATE

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OFFICIAL WITHDRAWAL

Q. What is the withdrawal date when the student provides official notification of intent to withdraw?

- A. The withdrawal date is the *earlier* of...
- Date Student began withdrawal process, or
 - Date student otherwise provided notification

Institutions are also permitted to use the last date of an academically-related activity.

34 CFR § 668.22(c)(1)(i) and (ii)

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ADMINISTRATIVE WITHDRAWALS

34 CFR § 668.22(c)(1)(i) and (ii)

Withdrawal date varies

- Date of event that triggered withdrawal, or
- Last date of academically-related activity if after event

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CIRCUMSTANCES BEYOND STUDENT’S CONTROL

34 CFR § 668.22(c)(1)(iv)

Withdrawal date accurately reflects when student ceased attendance

- Date circumstance occurred
- Later date if student continued attendance after circumstance occurred

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STUDENT DIES

34 CFR § 668.22(c)(1)(iv)

Withdrawal date

- Date circumstance occurred that caused student’s death, and
- Never later than date of student’s death

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ALL OTHER WITHDRAWALS

34 CFR § 668.22(c)(1)(iii)

Withdrawal date

- Midpoint of payment period or period of enrollment, or
- Last date of academically-related activity

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ACADEMICALLY-RELATED ACTIVITY

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ACADEMICALLY-RELATED ACTIVITY

May use institution's documented attendance at academically-related activity in lieu of any other withdrawal date

Must document that activity is academic or academically-related; and student's attendance at activity

Applies to official and unofficial withdrawals

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ACADEMICALLY-RELATED ACTIVITIES

Include but are not limited to...

- Attending synchronous class or activity
- Submitting academic assignment
- Taking assessment or exam
- Participating in interactive instruction
- Participating in institution-assigned study group, project, online discussion
- Interacting with instructor about academic matters

34 CFR § 600.2

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**Living in
institutional housing
or participating in a
meal plan**

Logging into an online class or tutorial without further participation

Participating in academic counseling or advisement

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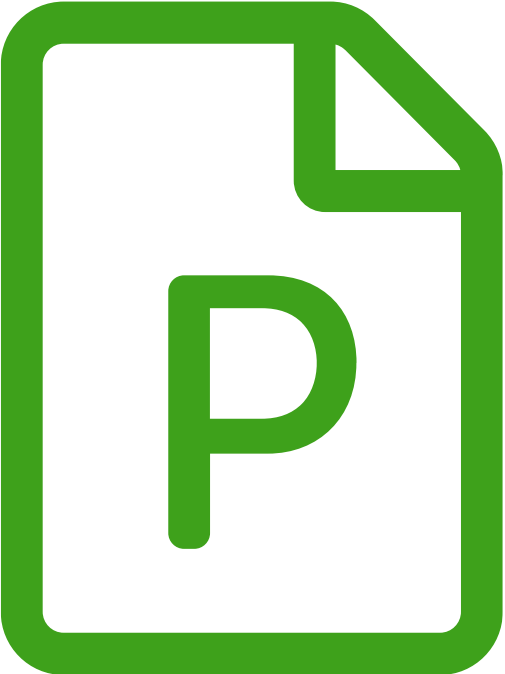
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PASSING GRADES

Receive at least one passing grade

Student is not a withdrawal if they:

- Received one passing grade over entire period **or**
- Received passing grade in the last module that they were scheduled to attend in period



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NO PASSING GRADES

Did not receive at least one passing grade

If student:

- Received no passing grades over entire period **or**
- Received no passing grade in the last module that they were scheduled to attend in period

Then the student is an unofficial withdrawal unless they completed period and earned at least one grade.



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DATE OF DETERMINATION

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DATE OF DETERMINATION

34 CFR § 668.22(l)(3)

- Date institution becomes aware that student ceased attendance
- Different for official vs. unofficial withdrawals

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OFFICIAL WITHDRAWALS

Date of Determination

Later of:

- Date student began official withdrawal process, **or**
- Date of withdrawal notification



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UNOFFICIAL WITHDRAWALS

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REQUIRED TO TAKE ATTENDANCE

Date of determination should be no later than 14 calendar days after student’s last date of attendance.

- May have policy to determine withdrawal in fewer than 14 days
- Days include holidays, breaks, and weekends

NOT REQUIRED TO TAKE ATTENDANCE

Date of determination must be no later than 30 days after the earlier of:

- End of payment period or period of enrollment
- End of academic year
- End of student’s educational program

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30-DAY DEADLINE

Within 30 days of date of determination

- Complete R2T4 calculation
- Notify student (or parent) of Direct Loan post-withdrawal disbursement
- Notify student of grant overpayment

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45-DAY DEADLINE

No later than 45 days after date of determination

- Return unearned Title IV funds (institution’s responsibility)
- Disburse post-withdrawal Title IV grant funds directly to student in excess of current (allowable) charges

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180-DAY DEADLINE

No later than 180 days after date of determination

- Disburse post-withdrawal grant or loan funds to student’s account for
 - Outstanding current allowable charges
 - Other allowable charges with student authorization
- Disburse post-withdrawal loan funds directly to student in excess of outstanding current (allowable) charges

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RESOURCES

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FEDERAL STUDENT AID HANDBOOK

- [Volume 4, Chapter 2](#), Direct Loan Disbursements
- [Volume 5, Chapter 1](#), [Chapter 2 \(Part 1\)](#), and [Chapter 2 \(Part 2\)](#), Withdrawal Dates, Modules, Date of Determination
- [Volume 7, Chapter 7](#), Pell Grant Initial Calculations and Recalculations

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FEDERAL REGULATIONS

- [34 CFR 600.2](#) Definitions (Institutional Eligibility)
- [34 CFR 668.21](#) Treatment of *Title IV* aid if recipient does not begin attendance
- [34 CFR 668.22](#) Treatment of *Title IV* funds when a student withdraws
- [34 CFR 690.80](#) Recalculation of a Federal Pell Grant award

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OTHER RESOURCES

- 1

Knowledge Center

[Knowledge Center Homepage](#)

Subscribe for daily or weekly email updates.
- 2

FSA Training Center

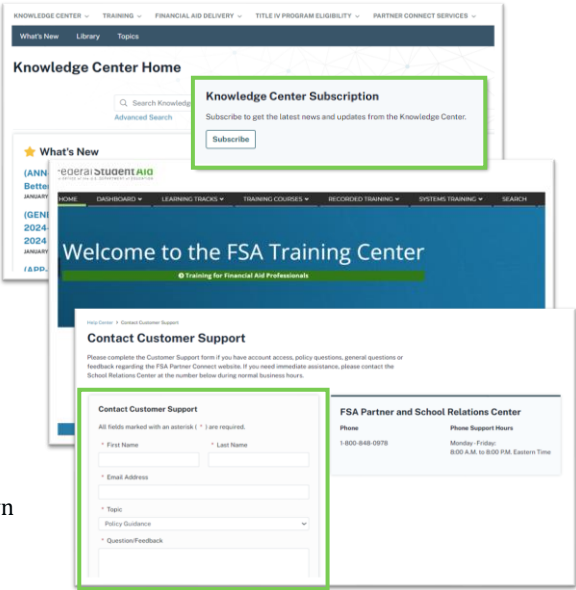
[FSAtaining.ed.gov](#)

View learning tracks, training courses, videos, and software training.
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QUESTIONS?

THANK
YOU!