

Zack Goodwin, Training Officer  
US Department of Education  
OASFAA Conference, Columbus, OH  
October 2018

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## Agenda

- Adds, drops, and Pell recalculation overview
- Administering Pell recalculations for programs in modules
- Adds, drops, and Direct Loans
- Enrollment reporting reminders

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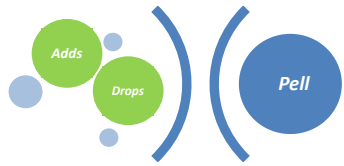
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### Pell Recalculation Date (PRD)

*Schools may set a Pell Recalculation Date (PRD) as a means to establish a timeframe for students to add or drop courses before 'locking in' a student's enrollment status for Pell Grant awarding purposes.*

*Schools will often refer to the Pell Recalculation Date as a census date, freeze date, or add/drop date.*

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### Pell Recalculation Options

- No Pell recalculation policy
- Pell recalculation for every course add or drop throughout a term
- Pell recalculation based on the enrollment status on a single fixed date
- Pell recalculation to account for modules within a term

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### Mandatory Pell Recalculation

*Regardless of the optional Pell recalculation policy a school may adopt, a student must begin attendance in all credits for which Pell is paid.*

*If a student does not start all credits for which they are paid, the school must perform a **mandatory** Pell recalculation and pay Pell based upon the credits in which the student began attendance.*

[34 CFR 690.80](#)

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## No 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.*

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## No Recalculation Policy

Initial Calculation:

*The first calculation that is made on or after the date the school has received an ISIR with an official EFC, and uses the enrollment status at the time of the initial calculation*

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## Example 1: No Recalculation Policy

- The school receives Joey's ISIR with an official Pell-eligible EFC on August 5, 2018, and makes an initial calculation that he is scheduled to begin attendance as a full-time student at the start of the term on August 15.
  - Joey begins attendance as a full-time student but drops 3 credit hours on August 20. *Joey will still receive full-time Pell since the school is required to use the initial calculation.*

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### Example 2: No Recalculation Policy

- The school receives Rachel's ISIR with an official Pell-eligible EFC on August 5, 2018 and makes an initial calculation that she is scheduled to begin attendance as a half-time student on August 15.
- Rachel adds two more classes and is enrolled full-time as of August 15, 2018 when classes begin. *The school is required to use the initial calculation of half-time enrollment status for Pell awarding.*

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### Example 3: No Recalculation Policy

- The school receives Phoebe's ISIR with an official Pell-eligible EFC on August 5, 2018 and makes an initial calculation that she is scheduled to begin attendance as a full-time student at the start of the term on August 15, 2018.
- Phoebe does not begin attendance in two of the classes and is considered half-time at the beginning of the term. *The school must recalculate for half-time status since Phoebe is ineligible for the initial full-time Pell originally calculated.*

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### Example 1: Recalculation Policy

*Fall term begins August 15, 2018  
with a PRD of August 30, 2018*

- Ross begins attendance on August 15 in 6 credit hours, but adds an additional course for 3 credit hours on August 22. Ross' enrollment status for Pell purposes is 9 credit hours (3/4-time).
- If Ross were to begin attendance on August 15 in 12 credit hours, but drop 2 courses for a total of 6 credit hours on August 25, his enrollment status for Pell purposes would be 6 credit hours (half-time).

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### Example 2: Recalculation Policy

*Fall term begins August 15, 2018  
with a PRD of August 30, 2018*

- Chandler begins attendance on August 15 in 6 credit hours, but adds an additional course of 3 credit hours on September 1. Chandler's enrollment status for Title IV purposes is 6 credit hours (half-time).
- If Chandler were to begin attendance on August 15 in 12 credit hours, but drop 2 courses for a total of 6 credit hours on September 1, his enrollment status for Pell purposes would be 12 credit hours (full-time).

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### Withdrawal Prior to PRD

*When determining Pell eligibility, a school must use the enrollment status established on the earlier of the date of withdrawal or the PRD*

- If the student withdraws *prior* to the PRD, the enrollment status for Pell purposes is established *as of the withdrawal date*
- If student adds a course *after* the PRD and subsequently withdraws, the enrollment status for Pell purposes is established *at the time of the PRD*

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### Example: Withdrawal Prior to PRD

*Fall term begins August 15, 2018  
with a PRD of August 30, 2018*

- Monica begins attendance on August 15 in 6 credit hours, but withdraws on August 22. Monica's enrollment status for Pell purposes is 6 credit hours (half-time).
- If Monica had begun attendance on August 15 in 6 credit hours, added 2 courses for an additional 6 credit hours on September 1, and subsequently withdraws on October 15....her enrollment status for Pell purposes would still be 6 credit hours (half-time).

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### Post-PRD Enrollment

If a program is offered in modules and the student enrolls after the established PRD, the school must use the enrollment status from the *initial calculation*.

-PRDs do not apply to periods of non-attendance!



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### ISIR Received after PRD

If a school receives an ISIR with an official EFC after the PRD, the enrollment status used for awarding Pell must be from *when the school is able to perform an initial calculation*.

-The initial Pell calculation could not have been performed until the school had an ISIR with an official EFC on file!

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### Example: ISIR Received After PRD

Fall term begins August 15, 2018  
with a PRD of August 30, 2018

- Emma begins attendance as a full-time student in 12 credit hours, but did not complete a FAFSA. On September 10 she drops one 3-credit course.
- On September 15 Emma submits a FAFSA on the Web and on September 17 the school receives her ISIR with an official EFC.
- At the time the school does an initial Pell calculation Emma is enrolled in 9 credit hours, so her enrollment status for Pell purposes is 9 credit hours (3/4-time).

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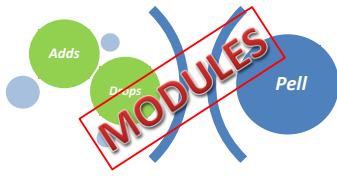
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## PRDs and Modules

- A school may assign a PRD to *each* module within a term
  - The PRD is 'activated' only in the event the student begins attendance in the assigned module
  - If the student does not begin attendance in an assigned module, the school should use the latest active PRD to determine enrollment status
- When a PRD is activated, all courses within the payment period are taken into consideration when determining enrollment status, including full-term courses

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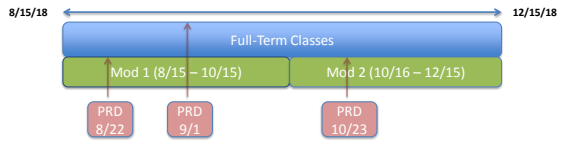
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## PRDs and Modules



- This school has three different PRDs:
- August 22 for Module 1 courses
  - September 1 for full-term courses
  - October 23 for Module 2 courses

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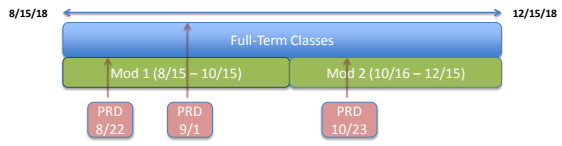
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### PRDs and Modules



- Janice is scheduled to attend 6 credits in the full-term courses, 3 credits in Module 1, and 3 credits in Module 2
  - She drops a full-term course (3 credits) on September 5 and the Module 2 course (3 credits) on October 20. Since she began attendance in Module 2, The October 23 PRD is used. Her enrollment status for Pell purposes is 6 credit hours (half-time).

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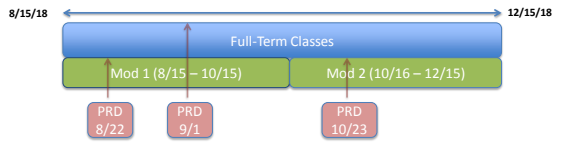
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### PRDs and Modules



- Emily is scheduled to attend 6 credits in full-term courses, 3 credits in Module 1 and 3 credits in Module 2
  - She drops a full-term course (3 credits) on September 5 and never begins attendance in Module 2. Since she did not attend in Module 2, the September 1 PRD is used. Her enrollment status for Pell purposes is 9 credit hours (3/4-time).

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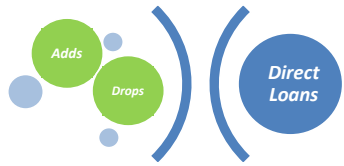
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## Adds, Drops and Direct Loans

- PRDs have no bearing in determining enrollment status 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
  - Ultimately, the student must have been enrolled half-time at the time of disbursement and started at least one class
- Schools must have a process to verify enrollment status before disbursement

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## Early Disbursements

*A school that disburses Direct Loan funds up to 10 days prior to the enrollment start date must ensure prior to disbursement that the student is scheduled to attend at least half-time.*

- If a student begins attendance as less-than-half-time (attending at least one course), s/he is eligible for the Direct Loan disbursement
  - Subsequent disbursements within a term cannot be made unless student reestablishes half-time status
  - Loans are repaid in accordance with the terms and conditions of the Promissory Note unless loan funds must be returned by the school due to student withdrawal

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## Early Disbursements

*If the student does not begin attendance in any courses, the school must return any Direct Loan funds credited to the student's account and retained*

- 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 a 30-day demand letter can be issued to the student

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## Pell Recalculation Resources

Federal Student Aid Handbook

- Volume 3, Chapter 3: Pell recalculations
- Volume 4, Chapter 3: Direct Loan disbursements

Code of Federal Regulations (34 CFR)

- 34 CFR 690.80: Pell recalculations
- 34 CFR 668.21: Student does not begin attendance

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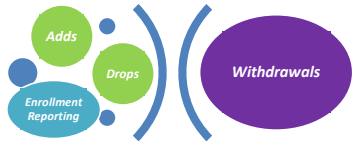
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## Enrollment Reporting Deadlines

- Schools are required to schedule a roster file to be sent by NSLDS at least as frequently as *every other month*
- Schools must certify enrollment data within 15 days of the roster file being sent by NSLDS
- If a response is provided by batch file response, NSLDS will process an Error/Acknowledgment file
  - Errors must be corrected within 10 days

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## Enrollment Reporting Deadlines

- *Servicers* are required to schedule a roster file to be sent by NSLDS at least as frequently as *every other month*
- *Servicers* must certify enrollment data within 15 days of the roster file being sent by NSLDS
- If a response is provided by batch file response, NSLDS will process an Error/Acknowledgment file
  - *Servicers* must correct errors within 10 days

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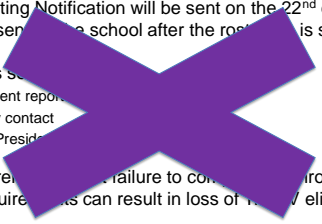
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## Late Enrollment Reporting

- A Late Reporting Notification will be sent on the 22<sup>nd</sup> day if no updates are sent to the school after the roster file is sent
- Notification is sent to:
  - Enrollment reporting
  - Primary contact
  - CEO / President
- Schools are responsible for failure to complete enrollment reporting requirements can result in loss of funding, eligibility or fines




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## Enrollment Reporting Resources

*Dear Colleague Letter GEN-14-17*

*Electronic Announcements:  
October 8, 2015, May 13, 2018, April 20, 2017 and October 5, 2017*

*NSLDS Enrollment Reporting Guide, November 2017*

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# Thank you!

Zack Goodwin  
zachary.goodwin@ed.gov  
312.730.1689



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# We Appreciate Your Feedback

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

<https://www.surveymonkey.com/r/ZacharyGoodwin>

This evaluation tool provides a means to inform us of areas for improvement, and to support an effective process for listening to our customers.

Additional feedback about training can be directed to Mark Gerhard at [Mark.Gerhard@ed.gov](mailto:Mark.Gerhard@ed.gov).

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# ED Contacts: Chicago

## Institutional Improvement Specialists

Effie Barnett  
effie.barnett@ed.gov  
312.730.1587

George West  
george.west@ed.gov  
312.730.1538

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## ED Contacts



### Reach FSA

855.FSA.4FAA.....One number to reach 7 contact centers!

- eZ-Audit      *School Eligibility Service Group*
- COD          *CPS/SAIG*
- NSLDS       *Nelnet Total & Permanent Disability Team*
- G5

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