



## Session 35

# Pell Calculations and Recalculations for Term-based Programs with Compressed Courses

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- **Student eligibility and receipt of SAR or ISIR**
- **Initial calculation of Federal Pell Grant**
- **Recalculation: required for changed enrollment status**
- **Recalculation: institutional options for changes in enrollment status**
- **Recalculation: receipt of a valid SAR or valid ISIR and new EFC**
- **Recalculation: case studies**
- **Effective enrollment status for R2T4**
- **Summary**
- **Additional information:**
  - ▶ **Additional case studies**
  - ▶ **Questions and answers**

# Student Eligibility and Receipt of SAR or ISIR

# Student Eligibility

- **Regulations – Rule changes published November 1, 2002**
- **All Title IV (except PLUS)**
  - ▶ §668.164(g)(2)(i) – receipt of SAR or ISIR with an official EFC processed by the Secretary before the student ceases to be enrolled
  - ▶ §668.164(g)(3)(i) – must make any postwithdrawal disbursement required under Return of Title IV
  - ▶ §668.164(g)(3)(ii) – must provide an opportunity to receive aid for successfully completed payment period or period of enrollment
- **Federal Pell Grants**
  - ▶ §668.164(g)(4)(iv) – receipt of valid SAR or valid ISIR by published deadline

# Student Eligibility

- **SAR or ISIR with an official EFC may or may not be a valid SAR or valid ISIR.**
- **Valid SAR or valid ISIR is one on which all the information used to calculate a student's EFC is correct.**
- **An institution can rely on a student's certification of the accuracy of the information unless it has conflicting information.**

# Student Eligibility Receipt of SAR or ISIR with an official EFC

- Establishes student's Title IV eligibility for the award year
- Must still meet all other student eligibility requirements
- Must disburse an eligible student's Title IV aid
  - ▶ For Pell see also §690.61(a) of Pell regulations
- For 2003-2004, must be received, i.e., processed, by the earlier of:
  - ▶ Student's last day of enrollment, or
  - ▶ September 17, 2004 (for recent disasters October 8, 2004)

# Student Eligibility Receipt of SAR or ISIR with an official EFC

- Use date labeled “**Processed Date**” on the ISIR as date of receipt
- Do **not** use other dates provided in the ISIR, such as:
  - ▶ Date ISIR Received
  - ▶ Transaction Receipt Date
  - ▶ Application Receipt Date
- Do **not** use an institutional receipt date

# Student Eligibility Receipt of SAR or ISIR with an official EFC

- **SAR or SAR Acknowledgement may document a processing date. For example, the institution is not listed on the CPS transaction processed prior to the student ceasing to be enrolled.**
- **Student may obtain a copy of the appropriate SAR transaction electronically using his or her PIN or call 800 4FED AID.**
- **The processing date on each record is:**
  - ▶ **For a SAR, the date above the EFC on the first page.**
  - ▶ **For a SAR Acknowledgement, the date labeled “transaction process date” in school use box.**

# Student Eligibility Receipt of Valid SAR or Valid ISIR

- **Must still receive a Valid SAR or Valid ISIR in addition to one with an official EFC**
- **May receive after student ceases to be enrolled, even if not verified**
- **If a late disbursement, must pay on –**
  - ▶ **The EFC of the valid SAR/ISIR if not verified**
  - ▶ **Higher EFC regardless of EFC of valid SAR/ISIR if verified: both ED- and school-selected (§668.60(c)(1))**

# Student Eligibility Receipt of Valid SAR or Valid ISIR

- For 2003-2004, except late disbursements, must receive valid SAR or valid ISIR by the earlier of –
  - ▶ Student's last date of enrollment, or
  - ▶ September 17, 2004 (for recent disasters October 8, 2004)
- For late disbursements (§668.164(g)(4)(i)), the earlier of –
  - ▶ 120 days after ceases to be enrolled (unless Secretary approves later date), or
  - ▶ September 17, 2004 (for recent disasters October 8, 2004)

# Student Eligibility Receipt of Valid SAR or Valid ISIR

- For 2003-2004, after verification, must receive valid SAR or valid ISIR, by the earlier of –
  - ▶ 120 days after ceases to be enrolled; or
  - ▶ September 17, 2004 (for recent disasters October 8, 2004)

# Initial Calculation of Federal Pell Grant

# Initial Calculation of Pell Grant

- **An initial calculation is the first calculation of a student's Federal Pell Grant award.**
- **It may occur prior to, during, or after attendance in classes.**
- **The institution must use the current, documented enrollment status (may be a projected status).**

# Initial Calculation of Pell Grant

- **For Pell, documentation of enrollment status may be:**
  - ▶ Some indication from student, e.g., admissions application
  - ▶ Assumption by the institution, e.g., institution knows most students enroll full-time

**Note for FFEL/DL: When an institution has compressed courses or modules, it must have documentation, e.g., registration or preregistration, that the student is enrolled at least half-time at the time of disbursement.**

# Initial Calculation of Pell Grant

## Date of Initial Calculation

- **Earliest possible date: date of receipt of an EFC from an ED product, such as:**
  - ▶ SAR or ISIR with an official EFC (processing date);
  - ▶ FAA Access EFC
  - ▶ FAFSA on WEB EFC
- **No necessity for a valid SAR or valid ISIR**
- **Not an initial calculation: use of a non-ED-generated EFC, e.g., a Federal Methodology EFC generated by a private vendor**

# Initial Calculation of Pell Grant

## Date of Initial Calculation

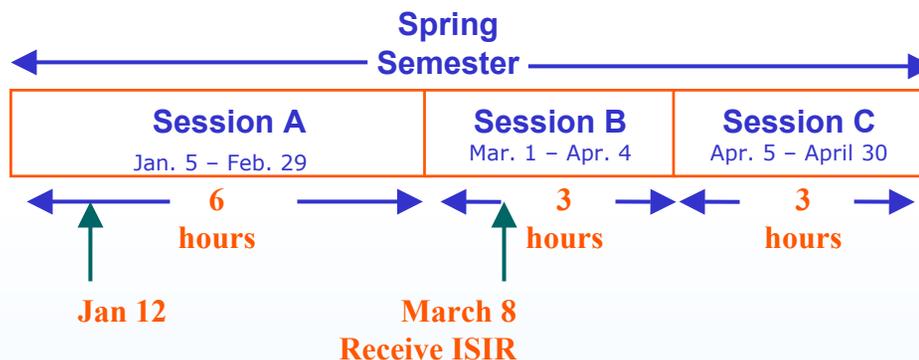
- **Upon receiving initial ED-product EFC, must confirm any previous calculation using data from other sources and must use current enrollment status**
- **For example:**
  - ▶ **Use vendor data in May based on projected full-time status**
  - ▶ **Receive an initial ISIR with an official EFC and processing date of September 10**
  - ▶ **On September 10, determine that student is half-time**
  - ▶ **Must use half-time as enrollment status for initial calculation**

# Initial Calculation of Pell Grant

## Date of Initial Calculation

- The date of the initial calculation is the **Processed Date** of the initial SAR or ISIR unless the institution documents for each student another date, such as:
  - ▶ Date use an ED-product EFC, or
  - ▶ A later date than the **Processed Date** of the initial SAR or ISIR, e.g., institution does not package until receives a valid ISIR.
- **Reminder:** if an institution is packaging other Title IV aid and has an ED-product EFC, it is also performing a Pell calculation.

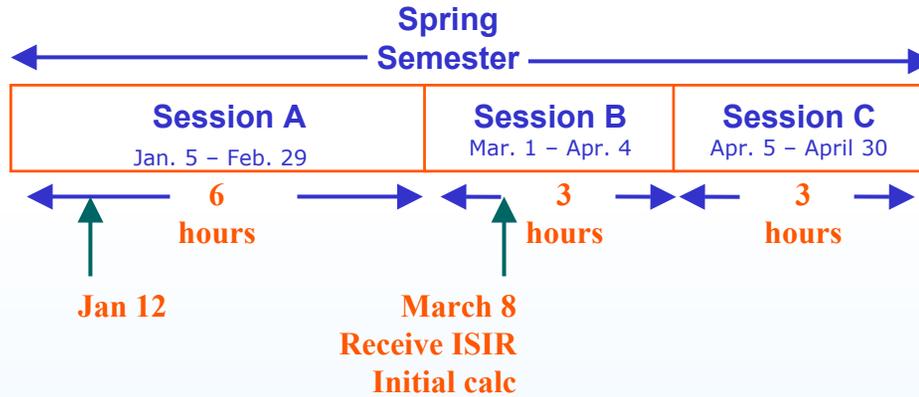
# Initial Calculation Case Study #1



## ■ Conditions

- ▶ Spring semester has compressed coursework over three sessions.
- ▶ Institution has a January 12 census date for the term.
- ▶ At the beginning of the term, student enrolls for 9 hours: 6 hours in session A and 3 hours in Session B.
- ▶ Student's initial ISIR is received on March 8, and school makes initial calculation.
- ▶ Student subsequently registers for 3 hours in Session C.

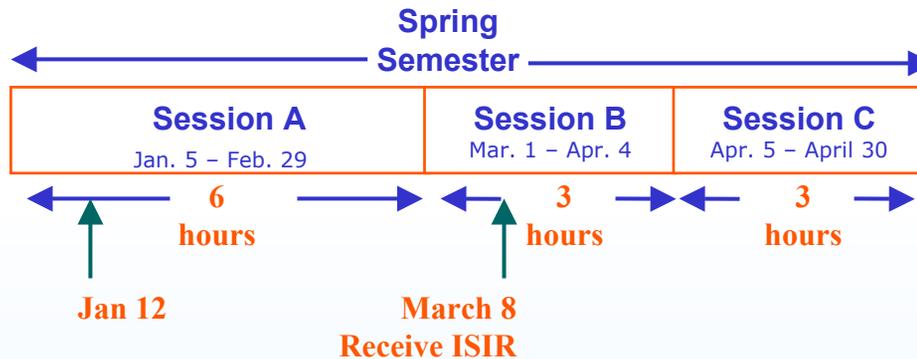
# Initial Calculation Case Study #1



## ■ Results

- ▶ At the time of the initial calculation the student is three-quarter-time.
- ▶ The institution cannot recalculate to take into account the additional 3 hours of Session 3 as it is past the census date.

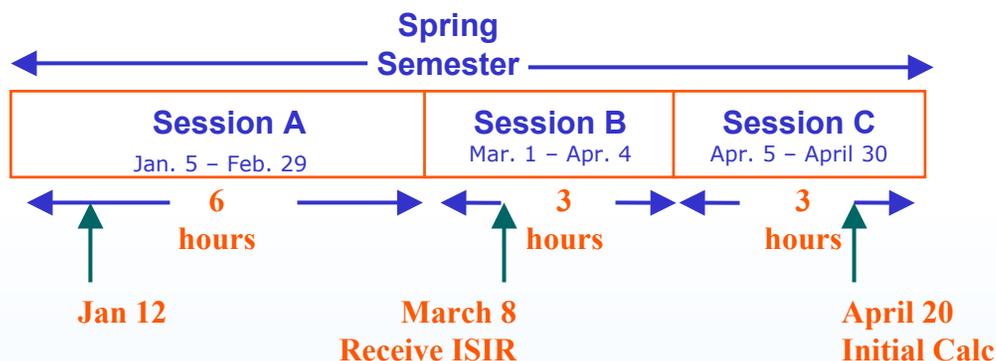
# Initial Calculation Case Study #2



## ■ Conditions

- ▶ Spring semester has compressed coursework over three sessions.
- ▶ Institution has a January 12 census date for the term.
- ▶ At the beginning of the term, student enrolls for 9 hours: 6 hours in session A and 3 hours in Session B.
- ▶ Student's initial ISIR is received on March 8.
- ▶ Student subsequently registers for 3 hours in Session C.

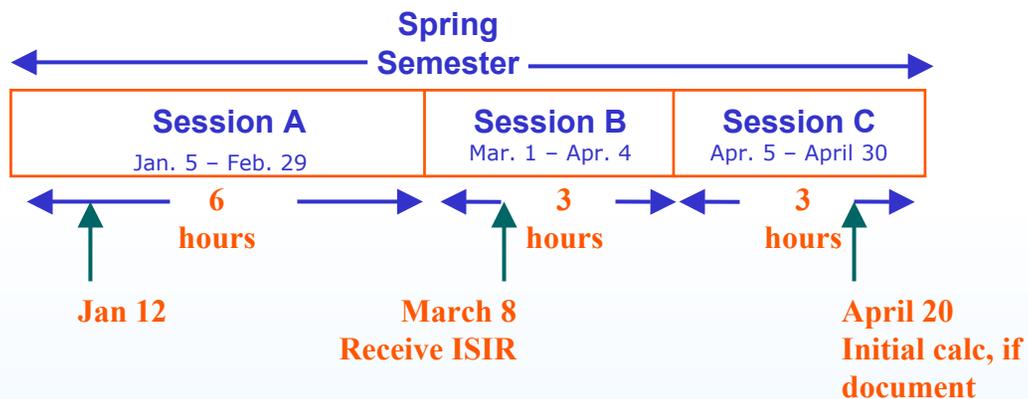
# Initial Calculation Case Study #2



## ■ Conditions (cont.)

- ▶ The institution does not make the initial calculation upon receipt of the ISIR because it is verifying the student's information.
- ▶ The institution confirms that the March 8 ISIR is valid on April 20 and makes the initial calculation of the student's Pell.

# Initial Calculation Case Study #2



## ■ Results

- ▶ If the institution documents that the initial calculation is on April 20, student is full-time.
- ▶ If the institution does not document the April 20 date of the initial calculation, the initial calculation is considered to have occurred on the processing date of March 8, and the student is three-quarter-time.

# **Recalculation: Required for Changed Enrollment Status**



# Required Recalculation For Changed Enrollment Status

- **§690.80(b)(1) – changes between terms**
- **§690.80(b)(2)(ii) – never begins attendance in one or more classes**

# Required Recalculation For Changed Enrollment Status

- **§690.76(b) – lump sum payment according to work completed in prior payment periods:**
  - ▶ **Must use final enrollment status of prior terms with no disbursements**
  - ▶ **If final enrollment status for the term is different from initial calculation, must recalculate**
  - ▶ **Include in enrollment status only courses completed (includes earned F's and incompletes)**
  - ▶ **Cannot include drops or withdrawals in enrollment status**

# Recalculation: Institutional Options for Changes in Enrollment Status

# Institutional Options for Recalculations for Changes in Enrollment Status

## ■ Institutional Options

- ▶ Recalculates for all changes in enrollment status during the term
- ▶ Does not recalculate for changes in enrollment status at any time in a term after initial calculation
- ▶ Does not recalculate after a census date

# Institutional Options for Recalculations for Changes in Enrollment Status

- **May have a census date**
  - ▶ For term
  - ▶ By course – a student’s ultimate census date for the term is the census date of student’s last course
- **If a student drops, withdraws from, or adds a class before census date, must recalculate based on any change in enrollment status through that census date**

# Institutional Options for Recalculations for Changes in Enrollment Status

- **An institution's policy must –**
  - ▶ **Be in writing**
  - ▶ **Be applied consistently to all students**
  - ▶ **Require recalculations for both increases and decreases in awards**

# **Recalculation: Receipt of a Valid SAR or Valid ISIR and New EFC (after an initial calculation)**

# Receipt of Valid SAR or Valid ISIR and New EFC (after initial calculation)

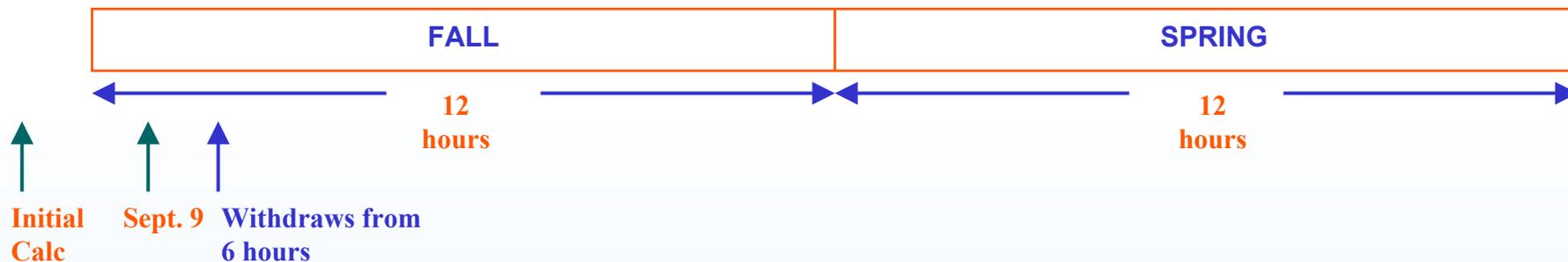
- **No disbursements have yet been made**
  - ▶ **If receive a valid SAR or valid ISIR in a term:**
    - must use the effective enrollment status for that term under the institution's policies for recalculations.**
  - ▶ **If receive a valid SAR or valid ISIR in a subsequent term:**
    - disbursement for a prior term is based on the enrollment for the work completed in the prior term.**

# Receipt of Valid SAR or Valid ISIR and New EFC (after initial calculation)

- **Disbursements have been made**
  - ▶ **If receive a valid SAR or valid ISIR in a term:**
    - must use the effective enrollment status for that term under the institution's policies for recalculations.**
  - ▶ **If receive a valid SAR or valid ISIR in a subsequent term:**
    - must use the effective enrollment status under the institution's policies for recalculations for a prior term with a disbursement.**

# Recalculation: Case Studies

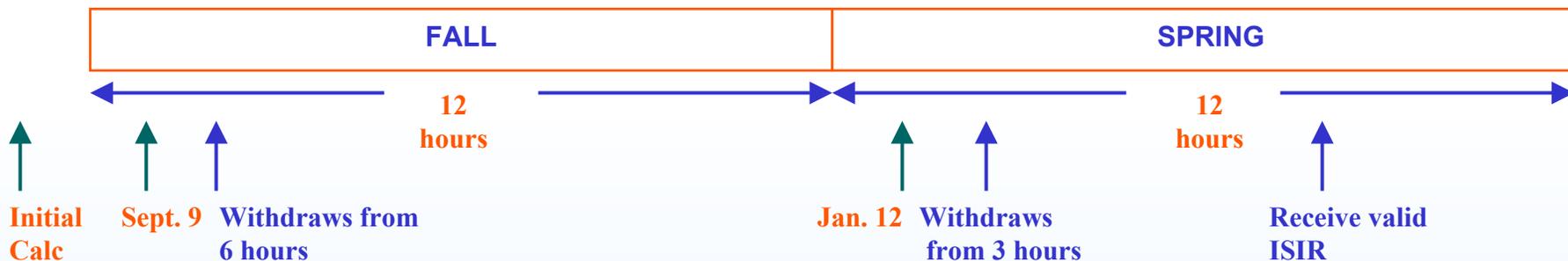
# Recalculation Case Study #1



## ■ Conditions

- ▶ A student's initial calculation is based on full-time for the fall and spring semesters.
- ▶ After the September 9 census date, the student drops to half-time.
- ▶ The institution never disburses for fall because it is resolving conflicting information.

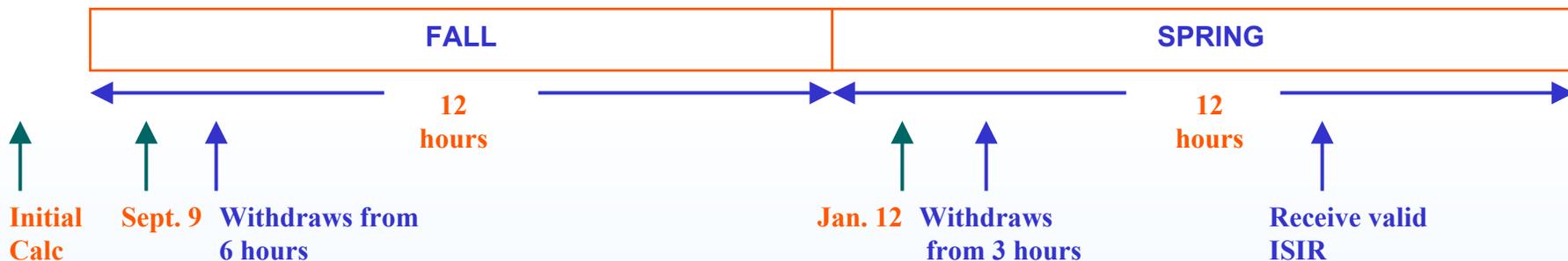
# Recalculation Case Study #1



## ■ Conditions (cont.)

- ▶ The student enrolls full-time in the spring semester but drops to three-quarter-time after the January 12 census date for spring.
- ▶ Then a valid ISIR is received with a new EFC.

# Recalculation Case Study #1



## ■ Results

- ▶ The student is paid as half-time for the fall and as full-time for the spring.

## ■ Reasons

- ▶ **Fall:** No disbursement was made during the term. Institution must use final enrollment status.
- ▶ **Spring:** The disbursement is being made within the term. Institution must use the census date enrollment status.

# Recalculation Case Study #2



## ■ Conditions

- ▶ A student's initial calculation is based on full-time for the fall, winter, and spring quarters.
- ▶ The fall Pell payment is disbursed, and after the September 9 fall census date the student drops to half-time.

# Recalculation Case Study #2



## ■ Conditions (cont.)

- ▶ For winter quarter student enrolls as full-time but after the January 12 census date drops to three-quarter-time. The institution never disburses for winter quarter due to resolving conflicting information.
- ▶ The student enrolls full-time in the spring quarter but drops to half-time after the April 5 census date for spring.
- ▶ Then a valid ISIR is received with a new EFC.

# Recalculation Case Study #2



## ■ Results

- ▶ The student is paid as full-time for the fall, three-quarter-time for the winter, and full-time for the spring.

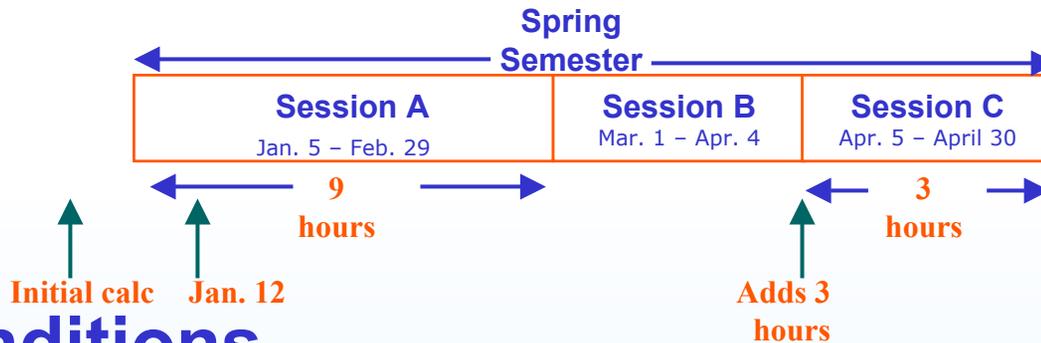
# Recalculation Case Study #2



## Reasons

- ▶ **Fall:** A disbursement was made. The payment is recalculated using the new EFC and full-time enrollment status.
- ▶ **Winter:** No disbursement was made during the term. The institution must use final enrollment status.
- ▶ **Spring:** The disbursement is being made within the term. The institution must use the census date enrollment status.

# Recalculation Case Study #3



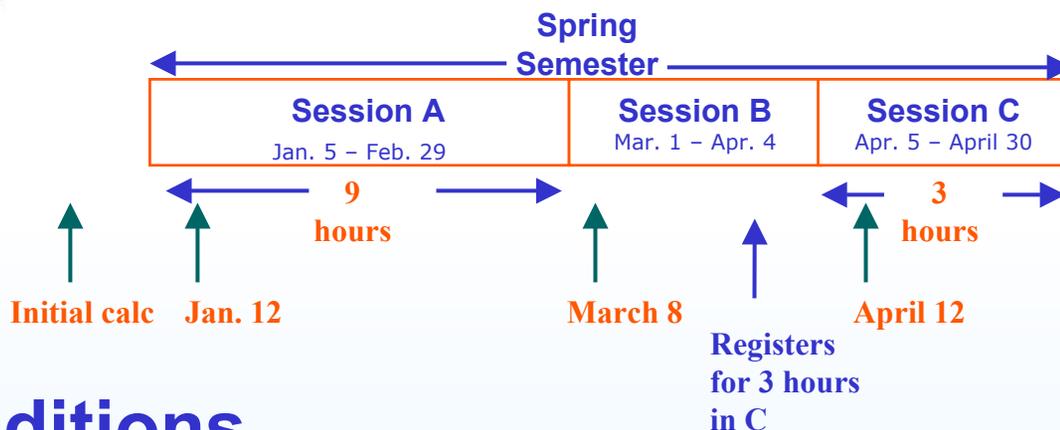
## ■ Conditions

- ▶ Institution has a single census date of January 12.
- ▶ Student enrolls for, and attends, 9 hours in Session A.
- ▶ At the beginning of Session C the student registers for three additional hours.
- ▶ Assumes the initial calculation was made prior to the term.

## ■ Result

- ▶ At census date student is a three-quarter-time student and remains so for the term.

# Recalculation Case Study #4



## ■ Conditions

- ▶ Spring semester has compressed coursework over three sessions.
- ▶ Institution has a census date for each session: January 12, March 8, and April 12.
- ▶ Student enrolls for 9 hours at the beginning of the term in Session A.
- ▶ In March the student registers for 3 hours in Session C
- ▶ Case assumes the initial calculation was made prior to the term.



# **Effective Enrollment Status for R2T4 (Return of Title IV)**

- **Use enrollment status as of date a student withdraws**
- **Must take into account required recalculation for any courses never attended**
- **Is no R2T4 if a student completes a compressed course within a term**

- **If, after withdrawing for the term and without completing a course, a student reenrolls for a course later in the same term—**
  - ▶ **The amount earned under R2T4 remains the same,**
  - ▶ **If applicable, the student's award is recalculated under the institution's policies, and**
  - ▶ **Any amount in excess of the amount earned is disbursed to the student.**

# R2T4 Case Study #1



## ■ Conditions

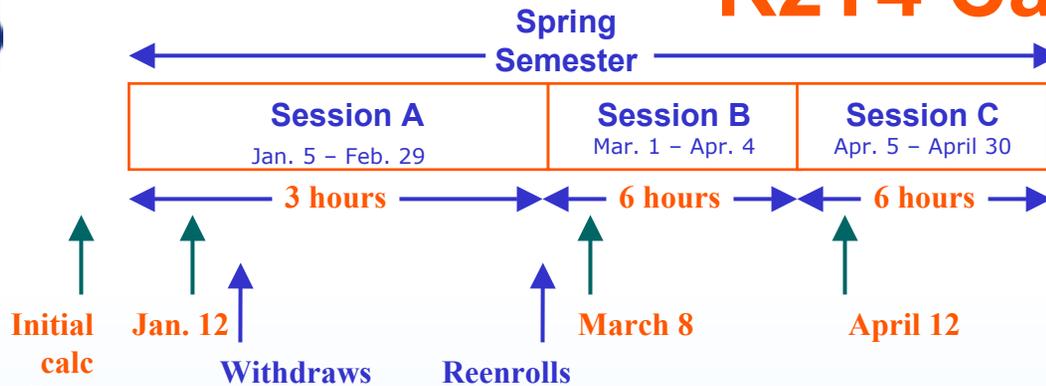
- ▶ Has term length and compressed courses
- ▶ Uses census date by last class: January 12 for term-length and Session A; March 8 for Session B; and April 12 for Session C
- ▶ Enrolls for 12 hours of term length courses
- ▶ Receives \$1,000 Pell for semester
- ▶ Withdraws completely on January 28 at 40 percent of term; must determine R2T4
- ▶ Reenrolls for 3 hours in Session C

# R2T4 Case Study #1



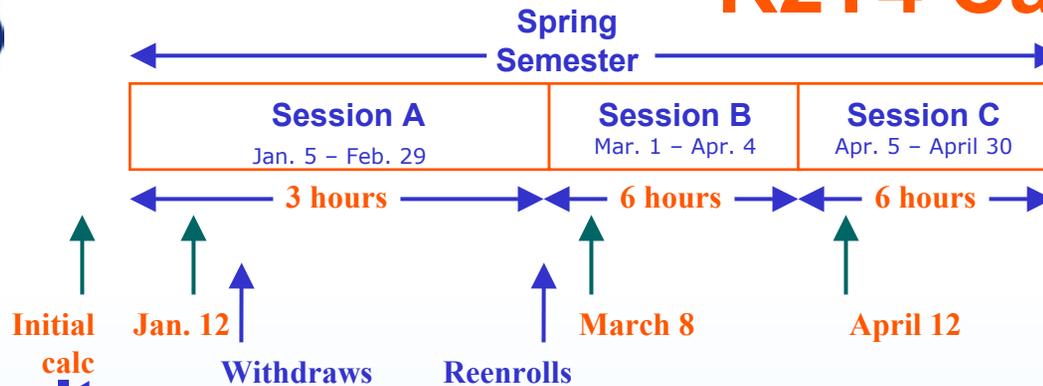
## ■ Results

- ▶ The effective enrollment status at the time of withdrawal is full-time.
- ▶ The student earns \$400 under R2T4.
- ▶ When the student reenrolls for Session C, the effective enrollment status is less-than-half-time.
- ▶ Student's payment for the payment period is now \$250.
- ▶ No further action taken because student has already received more than \$250.



## ■ Conditions

- ▶ Has term-length and compressed courses
- ▶ Uses census date by last class: January 12 for term-length and Session A; March 8 for Session B; and April 12 for Session C
- ▶ Enrolls only for 3 hours in Session A
- ▶ Receives a cash disbursement of \$250 Pell for semester
- ▶ Withdraws completely on January 17 at 20 percent of term; must determine R2T4
- ▶ Reenrolls at beginning of Session B for 6 hours in each of Session B and Session C



## Results

- ▶ The effective enrollment status at the time of withdrawal is less-than-half-time.
- ▶ The student earns \$50 under R2T4 and must return \$100 – repay or satisfactory arrangements.
- ▶ When the student reenrolls for Session B, the effective enrollment status is full-time.
- ▶ Student’s payment for the payment period is now \$1,000.
- ▶ The institution disburses the appropriate balance to the student, assuming earlier overpayment is resolved.

# Summary of Key Points

- **Initial receipt of SAR/ISIR and student eligibility**
- **Initial calculation tied to**
  - ▶ **Date of receipt of initial SAR/ISIR with an official EFC, or**
  - ▶ **Other, documented date use ED-product EFC**
- **Required recalculation**
- **Recalculation options**
- **Additional recalculation option: census date based on student's last course in term**



# Contact Information

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# Additional Case Studies

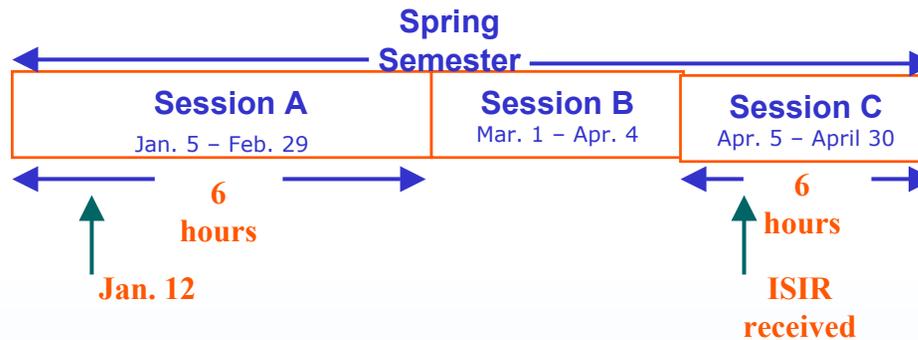


## ■ Conditions

- ▶ Institution has a single census date of January 12.
- ▶ Institution received ISIR with January 5 processing date.
- ▶ Student subsequently enrolls for 6 hours in Session C.
- ▶ At the beginning of Session C, institution initially calculates the award and documents that date.

## ■ Result

- ▶ At the initial calculation, the student is half-time. 55

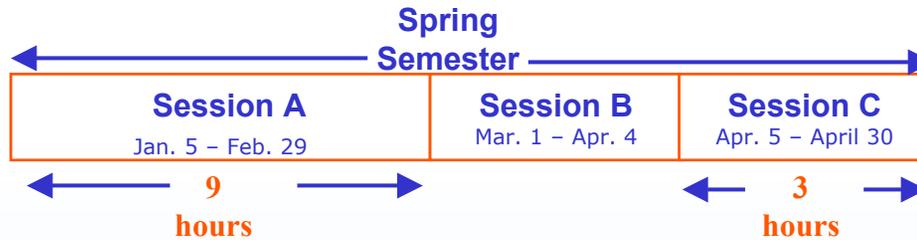


## ■ Conditions

- ▶ Institution has a single census date of January 12
- ▶ Student initially enrolls, and attends, as a half-time student with 6 hours in Session A.
- ▶ Student enrolls for, and attends, 6 hours in Session C.
- ▶ Institution receives initial ISIR with April 10 processing date.

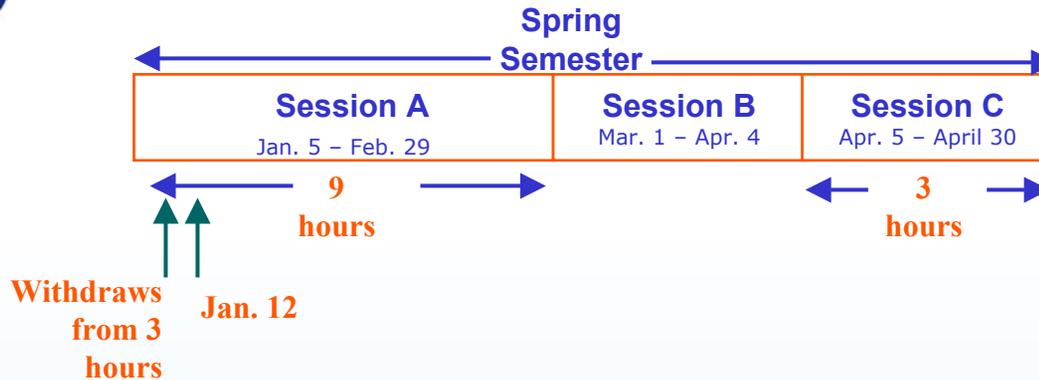
## ■ Result

- ▶ As an initial calculation cannot be made until April 10, the student is full-time.



## ■ General Conditions

- ▶ Spring semester has compressed coursework over three sessions.
- ▶ Institution has a single census date for the term of January 12 and does no recalculations after census date.
- ▶ Student enrolls for 12 hours at the beginning of the term: 9 in session A and 3 in Session C
- ▶ Case assumes the initial calculation was made prior to the term.



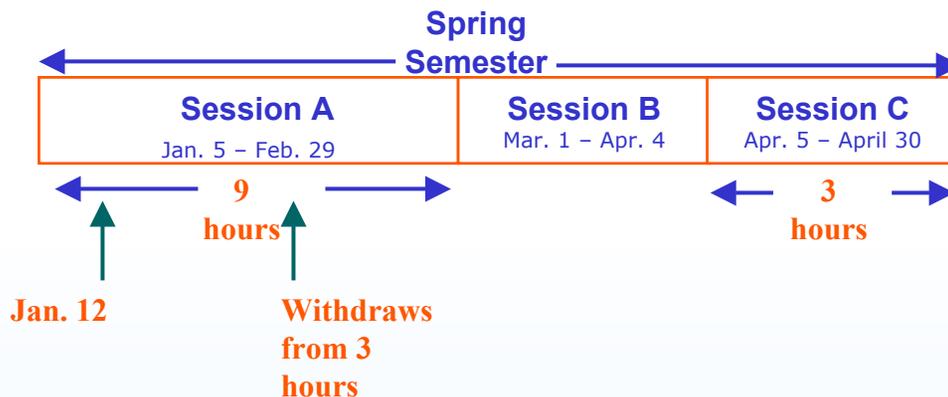
## Scenario One

### ■ Condition

- ▶ Student withdraws from 3 hours prior to January 12 and later attends Session C.

### ■ Result

- ▶ At census date student is a three-quarter time student.



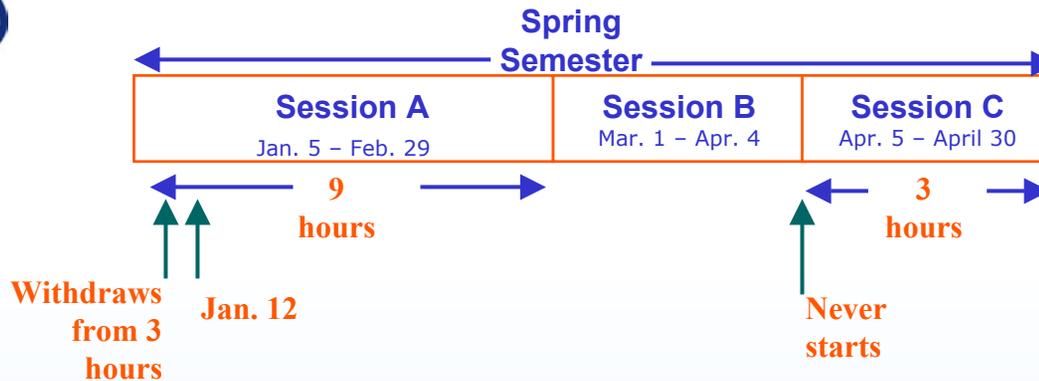
## Scenario Two

### ■ Condition

- ▶ Student withdraws from 3 hours after January 12 and later attends Session C.

### ■ Result

- ▶ At census date student is a full-time student.



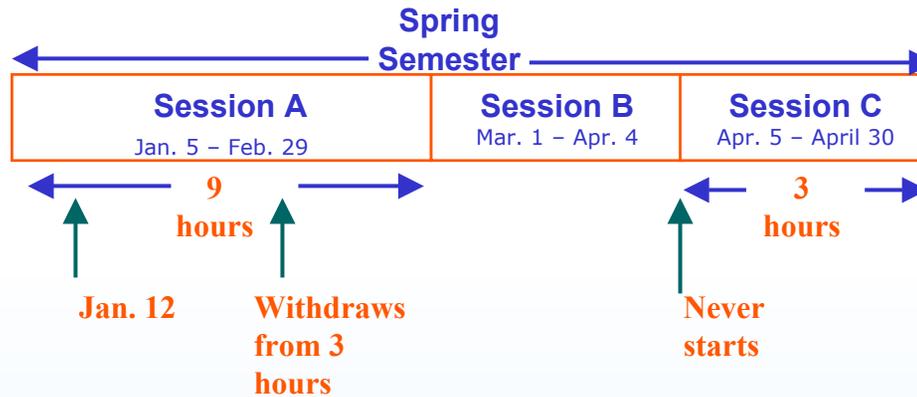
## Scenario Three

### ■ Condition

- ▶ Student withdraws from 3 hours prior to January 12 and never attends Session C.

### ■ Result

- ▶ At census date student is a three-quarter time student. However, the award must again be recalculated but as a half-time student when the student never starts attendance in the three hours of Session C.



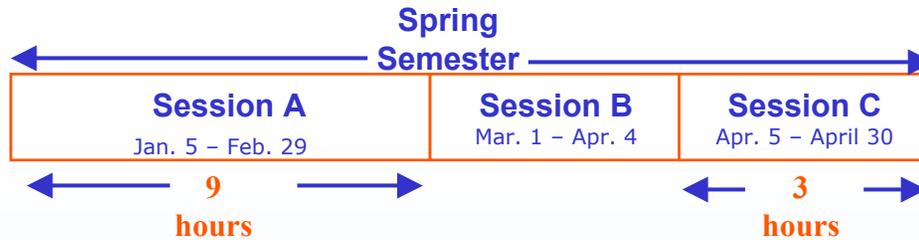
## Scenario Four

### ■ Condition

- ▶ Student withdraws from 3 hours after January 12 and never attends Session C.

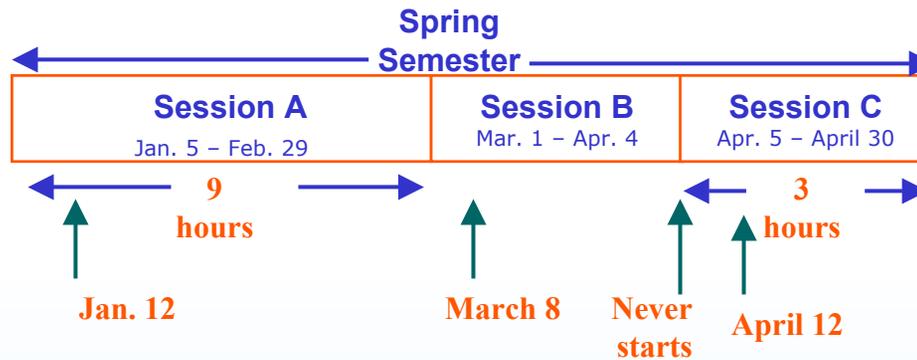
### ■ Result

- ▶ At census date student is a full-time student. However, the award must be recalculated as a three-quarter-time student when the student never starts attendance in the three hours of Session C.



## ■ General Conditions

- ▶ Spring semester has compressed coursework over three sessions.
- ▶ Institution has a census date for each session: January 12, March 8, and April 12.
- ▶ Student enrolls for 12 hours at the beginning of the term: 9 in session A and 3 in Session C
- ▶ Case assumes the initial calculation was made prior to the term.



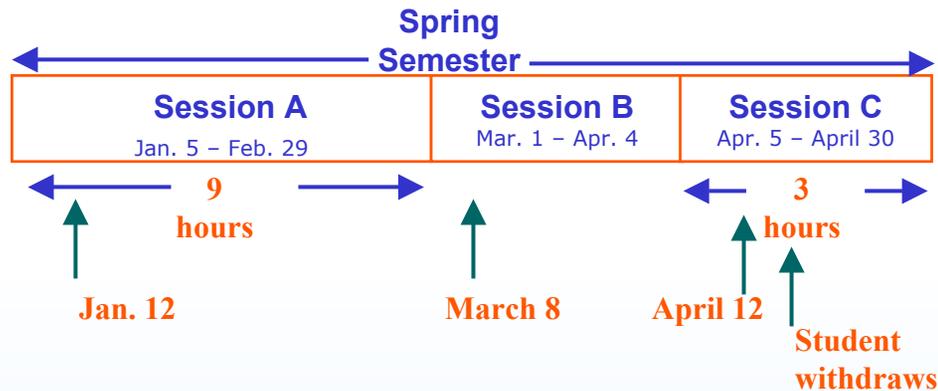
## Scenario One

### ■ Conditions

- ▶ Student never attends Session C.

### ■ Result

- ▶ The award must be recalculated as a three-quarter-time student.



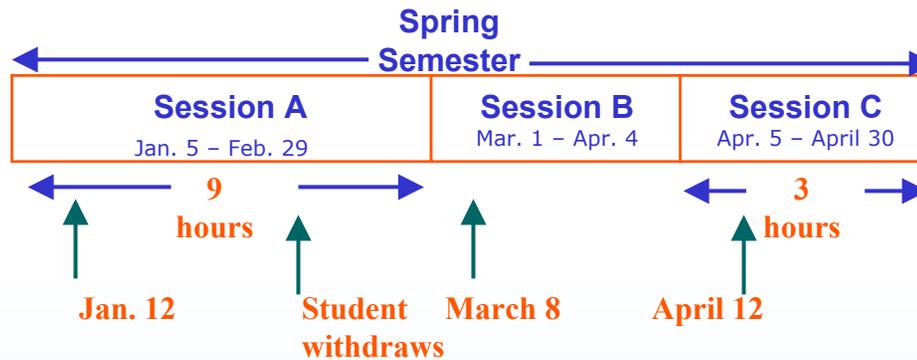
## Scenario Two

### ■ Conditions

- ▶ Student withdraws from the 3 hours of Session C on April 15.

### ■ Result

- ▶ The student remains full-time for the term unless Spring disbursement is made after April 30, the end of the term.



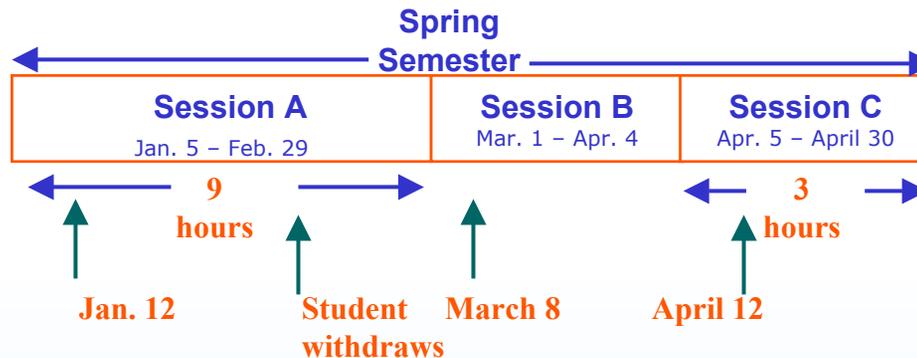
## Scenario Three

### ■ Conditions

- ▶ Student withdraws from the 3 hours of Session A but later attends Session C.

### ■ Result

- ▶ At the April 12 census date the student is three-quarter-time for the term. The student's award must be recalculated.



## Scenario Four

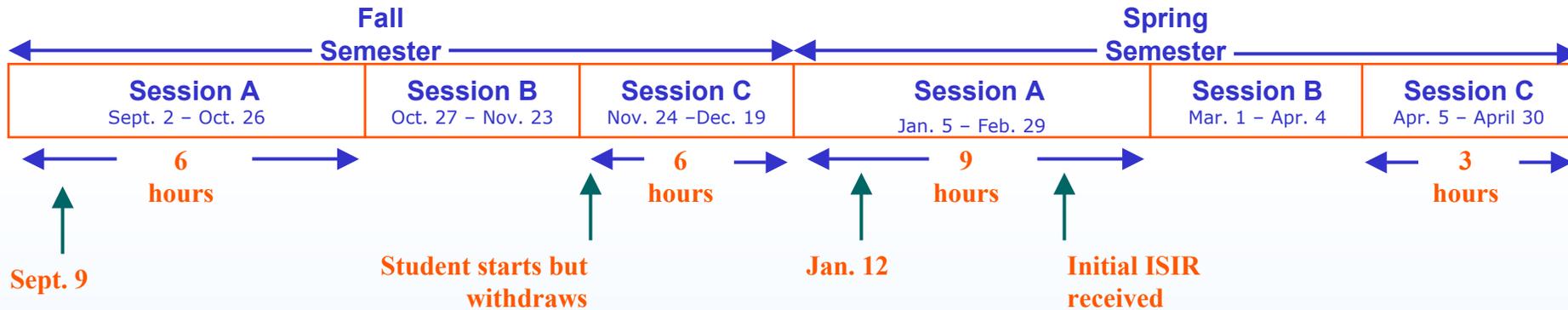
### ■ Conditions

- ▶ Student withdraws from the 3 hours of Session A and never attends Session C.

### ■ Result

- ▶ At the April 12 census date the student is a half-time student for the term. The student's award must be recalculated.

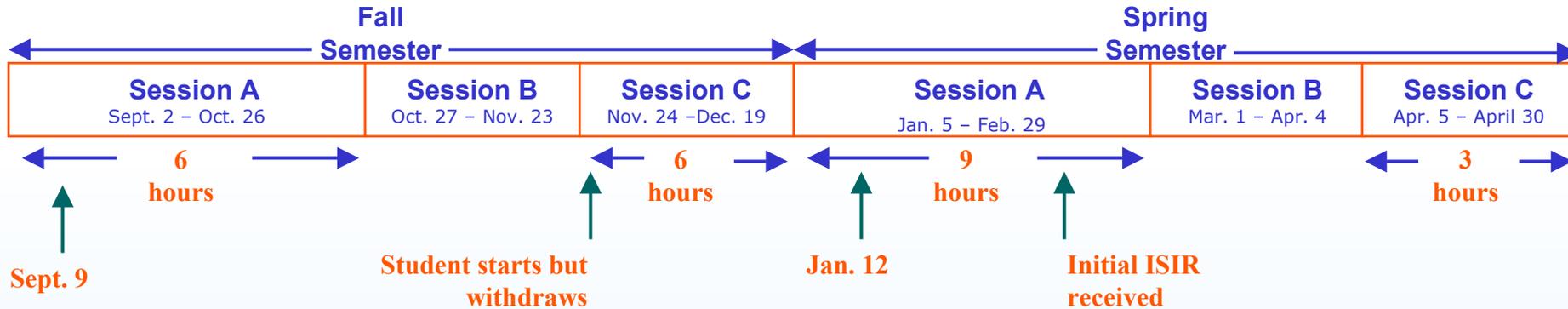
# Case Study #5



## ■ Conditions

- ▶ Census dates of September 9 and January 12 for each term.
- ▶ Student enrolls for fall as full-time and starts, but does not complete, last six hours of classes.
- ▶ Registers for 12 hours in spring and starts the first nine hours.
- ▶ Initial ISIR is received in February.

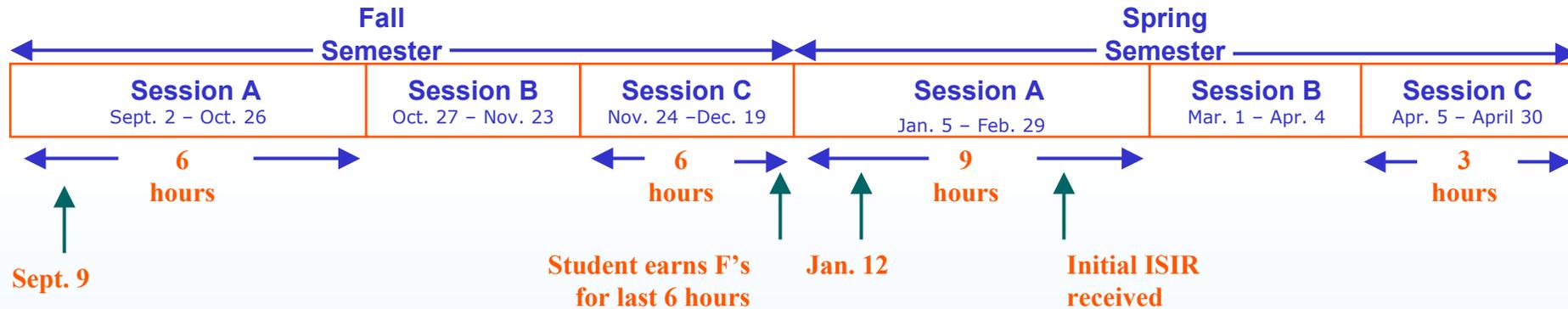
# Case Study #5



## ■ Result

- ▶ Student is paid as half-time for fall to pay for coursework completed and full-time for spring upon receipt of the ISIR.
- ▶ If the student does not attend spring Session C, award is recalculated as three-quarter-time for the spring term.

# Case Study #6



## ■ Conditions

- ▶ Census dates of September 9 and January 12 for each term.
- ▶ Student enrolls for fall as full-time and earns F's after completing the last six hours of classes.
- ▶ Registers for 12 hours in spring and starts the first nine hours.
- ▶ Initial ISIR is received in February.

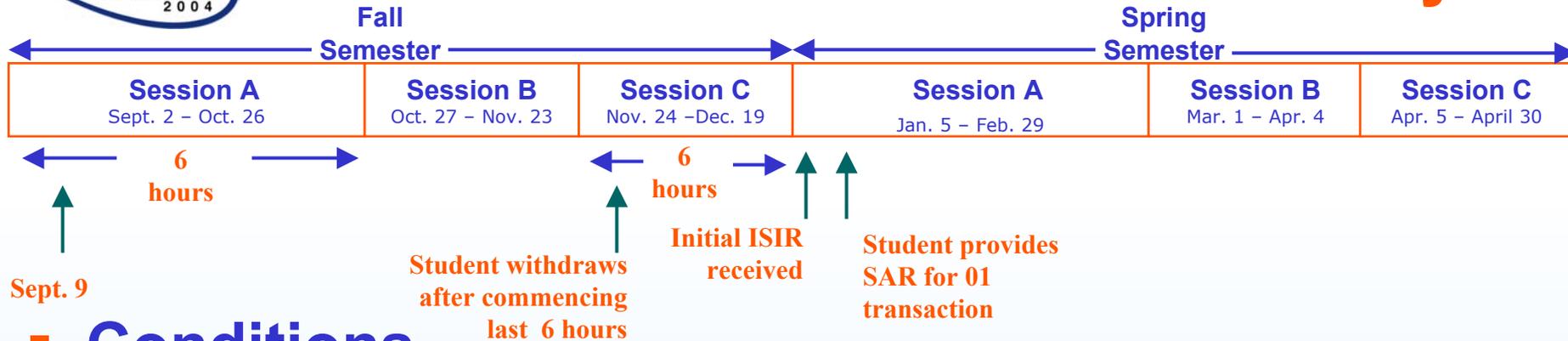
# Case Study #6



## ■ Result

- ▶ Student is paid as full-time for both terms upon receipt of the ISIR.
- ▶ If the student does not attend spring Session C, award is recalculated as three-quarter-time for the spring semester.

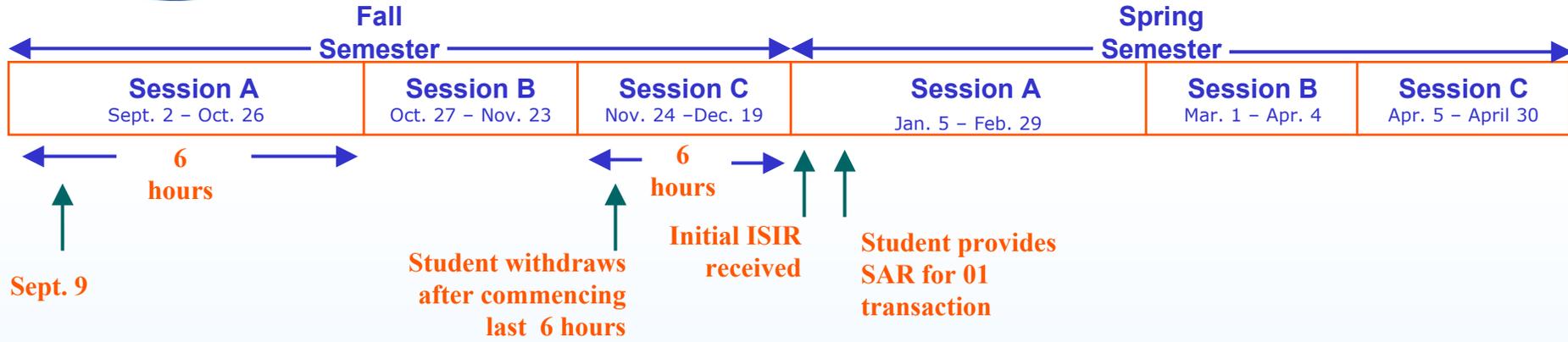
# Case Study #7



## ■ Conditions

- ▶ Census dates of September 9 and January 12 for each term.
- ▶ Student enrolls for fall as full-time but starts last six hours of classes and then withdraws from the institution.
- ▶ Initial ISIR listing the institution is received in January with a processing date of January 3 but is an 02 transaction.
- ▶ 01 transaction with an official EFC was processed on September 6, and student provides the 01 SAR to institution on January 10.

# Case Study #7



## ■ Result

- ▶ Student is paid a late disbursement as half-time for fall to pay for coursework completed.

# Questions and Answers

## Q's and A's

**1. Question:** If the SAR is reprocessed for the student to add another institution, will the “PROCESSED DATE” change?

**Answer:** Yes. For example, adding your school to a student's record creates a new transaction with a new processing date on the ISIR.

**2. Question:** Will this process differ if the student used their PIN to add this other institution?

**Answer:** No. A student and institution can document an earlier processing date by the student obtaining a copy of his or her SAR transaction processed on an earlier date (student can use PIN or call 800 number).

## Q's and A's

**3. Question:** Does the student still have the ability to reject their Pell Grant award – even though §668.164 indicates that you “must” make any postwithdrawal disbursement?

**Answer:** Yes, if you document that the student declined the award. We have identified a number of appropriate reasons including the student reenrolling elsewhere, having religious reasons, or receiving greater aid from another source by declining a Pell Grant. Note that an institution cannot refuse to pay, e.g., summer term that is treated as the first term of an award year, unless the institution documents that the student declined the award.

## Q's and A's

**4. Question:** Can an institution establish a verification deadline as an institutional policy limiting the amount of time that the student had to submit verification documents?

**Answer:** An institution must follow the deadlines published in the Federal Register (Table A) for the Federal Pell Grant Program. For campus-based, DL, and FFEL, the institution may establish its own deadlines but no later than those published in the Federal Register.

(see §668.60(b) and (c) of the Student Assistance General Provisions regulations)

## Q's and A's

**5. Question:** An institution packages student for a summer award based on a valid SAR/ISIR, the student fails to start during summer A, the census date expires and student is not enrolled. If student enrolls in summer B – you are still within the term, you can pay for summer B – as long as the student begins attendance for the summer B term. Is “packaging” considered to be the calculation of the student’s initial Pell Grant award?

**Answer:** Since you are using a SAR/ISIR with an official EFC, in this case a valid SAR/ISIR, the initial calculation occurs at the time of packaging. For example, as a full-time student with 6 hours in A and 6 hours in B. As of the census date,

## Q's and A's

### Answer (cont):

the student never attended the 6 hours of classes in A. Assuming the student is still registered or otherwise documented as expecting to attend summer B, the institution would recalculate the student's award as a half-time student. If this student had registered only for A, never attended, and subsequently registers for summer B after the census date, the student is not eligible for a summer Pell award.

## Q's and A's

**6. Question:** Does a packaged Pell Grant award mean that the institution completed the initial Pell Grant award calculation?

**Answer:** Yes, if the institution has an EFC from an ED product.

**7. Question:** If the institution does not package until they have a “verified updated ISIR” and are packaging the student AFTER the census date, would the student be eligible to be paid for courses for which they register after the census date up to the time of the initial calculation?

**Answer:** Yes. But the institution must document the date of the initial Pell Grant award calculation.

## Q's and A's

**8. Question:** If an institution is not “packaging” until after all verification has been completed, how does the timing impact the recalculation process?

**Answer:** If no calculation of the student's Pell is done until the institution has a valid SAR or ISIR, then that calculation is the initial calculation (this answer, of course, assumes you have not packaged any Stafford loans or campus-based aid). It would be a recalculation for any subsequent calculation of the student's Pell Grant.

## Q's and A's

**9. Question:** What is the result if a student never starts attendance in the last class if the institution has a policy of setting a census date by the last class in which the student enrolls?

**Answer:** The student is expected to enroll in the later class, and, therefore, the census date for that later class is the census date for the term. For example, a student registers at the beginning of a semester for 9 hours in session A and 3 hours in session C. After the census date for session A, the student withdraws from 3 hours. The student never starts class for session C. The session C census date is the applicable date for this student, and the student's effective enrollment status for the term is half-time for purposes of determining the student's Pell Grant.