

Webinar Q&A: Date of Determination Solved!

To clarify, the Date of Determination is really just used to determine when the 60-day clock starts to report changes, is that correct?

Yes, exactly! The *Date of Determination Solved!* webinar presentation does not speak to new guidance; there is no new guidance regarding the parameters for timely reporting. What has changed is simply that the [latest NSLDS Guide](#), released in November 2017, contains additional clarification and explanation of the **existing** requirements for timely reporting of enrollment status changes.

So to clarify and maybe simplify, Date of Determination (DOD) and Last Date of Attendance (LDA) are not equal. Correct?

The Date of Determination is only the same as the Last Date of Attendance (LDA) in the event the institution learns of the status change the same date the status was in effect. Otherwise, typically, the DOD is the date the institution learned the student status changed.

The new NSLDS Reporting Guidelines came out last month [November 2017]. Is that when they [the guidance] went into effect or are they retroactive? Are there plans to make the Date of Determination a reportable element? I know that Ellucian Banner has a created status date when the degree is officially awarded and that is what is used as the Date of Determination.

The Clearinghouse is unaware of any plans wherein the Department will require schools to report the Date of Determination. There is no change at this time to how you report to Clearinghouse for purposes of compliance reporting to NSLDS.

Have you heard of any schools that were incorrectly cited having gone back to the auditors and gotten them to reverse the finding?

Yes, the Clearinghouse's Audit Resource Center has worked with schools who we assessed to be erroneously cited for untimely enrollment status change reporting. It is at the school's discretion and assessment to explore options to reverse a prior finding that the clarification guidance in NSLDS Nov 2017 guide release provides explanation for how a status change was timely.

How does an incomplete grade impact our Date of Determination? Incomplete by school policy is not resolved until the following term and it may result in an "F" or a passing grade.

NSLDS enrollment status codes are defined in the code of federal regulations and referenced in the NSLDS Guide. Schools must assess the appropriate status for a student when certifying enrollment for students. Because NSLDS expects enrollment be certified at least every two months, a determination

must be made by the school to assign the appropriate enrollment status code for a student. Information is available in the [FSA Handbook](#) (see page 5-52) that addresses when a student is considered in-school versus “Withdrawn” with regards to failing to pass any classes.

Questions about Scenario 1:

Student Scenario #1

Background:

- *A student was last enrolled in spring at an institution where the summer session is optional*
- *This student has no summer courses, but registered for fall and is expected to return in fall.*
- *The student does not end up returning for fall, which is discovered on the fall census date.*

For the Above Example...

1. *The Effective Date of the Student’s Status Change is the spring term end date.*
2. *The date of determination of the retroactive enrollment status change is the fall census date. The school has 60 days from the fall census date (or the date that the student’s status change was determined) to report the status change to NSLDS.*

In scenario 1, do you calculate the status and effective date yourself?

From the school’s First of Term enrollment file submission (created after the census date), the Clearinghouse calculates “Withdrawn” statuses for students who were in school during the spring or summer, but who not reported on the current term’s First of Term enrollment file. Typically, in the event the student is expected to return in the fall and does not, the school uses the census date to determine when the student withdrew. In scenario #1, the census date is the date of determination when the 60-day timeliness clock starts ticking.

Referring to student scenario 1, what if a student is not registered for fall and successfully completes spring?

For institutions where summer is an optional term, and the institution believes the student will return in fall, the student is typically not considered withdrawn until the fall registration period is completed. This is usually the census date and the Clearinghouse’s calculated withdrawal process is utilized. If the student is not expected to return for the fall, the school should report the student as withdrawn and take the last date of attendance/participation into account in order to provide the status effective date.

Questions about Scenario 2:

Student Scenario #2

Background:

- A student has applied to graduate as of the spring term. The last day of classes for the spring term is May 15 and the graduation ceremony is May 18.
- After the end of the term, grades are reported and the institution performs its degree audits.
- On June 2, the degree audit process is completed and the institution determines the student has completed all their degree requirements and the degree is officially conferred.

For the Above Example...

3. The Effective Date of the Student's Graduation recorded by the school is the last day of classes or the ceremony date (May 15 or 18).
4. The Date of Determination of the Student's Status Change is the date that the school determined that the student met all of the requirements for the "G," as defined by FSA/NSLDS and the school's policy, on June 2.

For student scenario #2, is there a guideline for what the Date of Determination deadline should be for a degree audit period?

There is no specific Department of Education (ED) guidance surrounding timeline for Date of Determination. However, NSLDS expects schools to certify enrollment at least every two months and there are stipulations that schools should have mechanisms or controls in place to identify changes in enrollment status, in a timely manner.

Scenario 2, if the ceremony is three weeks after the end of term, I believe we should use the last date of term since it is [occurring in more than] just a few days. Correct?

In the event the student is not reported by the school to the Clearinghouse as "Withdrawn" with an effective date equal to the Last Date of Attendance (LDA) then, yes, it is appropriate for the student to be reported as "Graduated" with an effective date equal to LDA. However, if the student is first reported by the school to the Clearinghouse as "Withdrawn" with an effective date equal to the LDA, then a later reported "Graduated" enrollment status can be either the same date as the effective date of the previously reported "Withdrawn" status or some effective date thereafter, as determined by the school.

If our last transmission of enrollment for the term is prior to grading and the last attendance date is known after the fact; do we still need to transmit that data even though we are starting the enrollment transmission for the next term?

The Clearinghouse recommends a final enrollment file be transmitted after the term's end date and that it include the final enrollment stats code certified for the student for the term that just ended. In the event a student is later assessed to be "Withdrawn," then the school can work with the Clearinghouse to

determine how to report the retroactive withdrawal. The date of determination for this scenario would be the date the school determined the student was a retroactive withdrawal.

What is a good way to represent the Date of Determination for degree completions since it is not a data element that is uploaded?

The date the school confirms the student completed the credential requirements for the program is the date of determination for the corresponding “Graduated” status, independent of the effective date of the “Graduated” enrollment status code.

The Date of Determination is currently not reported in our transmission, is this correct? Do we now need to submit this information? Or is it the Clearinghouse that determines this information from our enrollment transmission?

There is no change to how you extract or report enrollment data to the Clearinghouse. The only change to the information in the [November 2017 version of the NSLDS Guide](#) is the additional clarification provided by NSLDS on how to properly assess the timeliness of reporting enrollment status changes. We suggest that you have procedures and/or policies in place that document how and when the date of determination is established. Your auditor will likely want to see your procedures and/or policies and ensure you are following them.

I have a scenario to clarify, if we [were] informed a student is going on leave on Dec. 1, but their last date of attendance was Nov. 25, the status effective date would be Nov. 25, but the Date of Determination would be Dec. 1 (since that is the date [on which] we were made aware [of the status change]). And the Dec. 1 is when the 60-day clock would start, but Nov. 25 would be the effective date of the LOA status. Is this correct?

Yes, November 25 is the status effective date while December 1 is the date on which the 60-day timeliness clock starts ticking, as it is the date your school learned of the student’s status change. In this scenario in order for the status change to be reported in timely manner, the status change must be sent from the Clearinghouse to NSLDS within 60 days after December 1.

For a non-attendance taking school, the department of Ed allows us to use the midpoint of the term for unofficial withdraws rather than the last date of academic activity. How does this reconcile with your statement of recording last date of activity for enrollment reporting?

The Clearinghouse does not make academic policy. We advise schools to report to us via our Enrollment Reporting service with the enrollment status codes and effective dates that align with current ED guidance from the FSA Handbook, NSLDS Guide, and Code of Federal Regulations. The Department of Education guidance and suggestions should be incorporated into the institution’s academic policies.

The registrar's office reports enrollment status. A student that stops attending, but still gets an "F" grade is technically still considered enrolled for the term in the same status. However, for Title IV, the student status decreased the date the student stopped attending that class.

The Clearinghouse advises schools report to us via our Enrollment Reporting service with enrollment status codes and effective dates that align with current ED guidance from the FSA Handbook, NSLDS Guide, and Code of Federal Regulations. If the student is considered "Withdrawn" for Title IV, the Clearinghouse advises the school report the "Withdrawn" status and effective date that align with the Department of Education's definition of "Withdrawn." We also suggest that the school's financial aid office and registrar's office align their respective definitions of enrollment statuses and effective dates.

Just want to make sure we understand what should be reported in the status effective date, we have a full-time student whose instructor reports on March 1 that the student has stopped attending this course as of Feb. 1 (LDA). Our status change in our SIS is recorded as March 1 when the instructor reported the unofficial withdrawal. Should the effective status date be Feb. 1?

The intent of the updated guidance regarding date of determination is to clarify the existing long-standing guidance; it is not new guidance. For this scenario, "Withdrawn effective Feb. 1" is the appropriate status and effective date to report to the Clearinghouse. To assess if the "Withdrawn" status effective Feb. 1 was reported in a timely manner from the Clearinghouse to NSLDS, the status must be sent from the Clearinghouse to NSLDS within 60 days after March 1, the school's date of determination.

We generally do not know who our non-attending students are until about 3-4 weeks into the semester. We do our first of term report about 7-10 days after the first day of the semester, obviously well before we know who is not attending. What is the best way to update the statuses of these students with an effective date of the last day of the fall semester, assuming that they were reported as enrolled in our first report of the semester?

If a student had been reported as enrolled in a previous term and does not appear in the Census or First of Term file submitted to the Clearinghouse for the next required term, the Clearinghouse will create a "Withdrawn" status record for the student with an effective date based upon the last day of the term that the student previously completed. If a school reported a student as enrolled in a term and, subsequently, determines that the student's status was reported incorrectly or needs to be updated, the school can submit a new file that includes all the updated enrollment information. Additionally, the school can submit an online update for just the student(s) who needs a correction/update via the Online Update functionality in the school administration area of our secure site. Please contact us at service@studentclearinghouse.org, if you have any questions about making updates.

We have students who were enrolled in the spring, for example, and notify us halfway through the summer (which is not a required term) that they will not be returning. Will the effective date be the last date of the spring semester or the date that they notified us that they would not be returning (i.e., July 1)? We also have students who notify us that they are withdrawing midway [during] the fall or spring semester. Again, do we use the date of notification or the last day of the last enrolled semester?

Typically, we say the effective date for the “Withdrawal” is the last date of attendance. However, depending on whether the school is mandated to take attendance or not, there are instances an effective date other than the last date of attendance is compliant. [FSA Handbook, Volume 5](#) includes a chart on page 5-118, “Withdrawal Dates for a School that is Not Required to Take Attendance.” You should follow the information in this chart, depending on the applicable reporting expectations for your school (e.g., required to take attendance, not required to take attendance, etc.).

Does the calculated withdrawal automatically use the last day of the last enrolled semester as the effective date? If not and we subsequently officially withdraw a student, are we required to submit the effective date as an update?

If a student had been reported as enrolled in a previous term and does not appear in the Census or First of Term file submitted to the Clearinghouse for the next required term, the Clearinghouse will create a “Withdrawn” status record for the student with an effective date based upon the last day of the term that the student previously completed. If a school submits a student in a “Withdrawn status,” the effective date is a required data element. Please contact us at service@studentclearinghouse.org, if you have any questions about submitting updates or making corrections.

Will you address reporting enrollment data on students who receive "all Fs" at the end of fall or spring terms and it isn't determined that they were a complete withdrawal until after summer has already been reported?

NSLDS enrollment status codes are defined in the code of federal regulations and referenced in the NSLDS Guide. Schools must assess the appropriate status for a student when certifying enrollment for students. Because NSLDS expects enrollment be certified at least every two months, the school must determine the appropriate enrollment status code to assign a student. Information is available in the [FSA Handbook](#), Volume 5, page 5-52, that addresses when a student is considered in-school versus withdrawn with regards to failing to pass any classes.

When the student has an incomplete grade in June but the professor change the grade in October, what date should be granted the degree in June or October? Our auditors tell us that it must be June. We would like to know if it is correct.

In the event the student’s last date of attendance is the June date, it is appropriate for the student to be reported as withdrawn if the student withdrew in June. If the student is granted the degree in October (after meeting requirements for the degree, as assessed by the school in October), the “Graduated”

status can be either the same date as the effective date of the previously reported “Withdrawn” status or some effective date thereafter, as determined by the school.

How do institutional appeal committees factor in? For example, if such a committee allows a retroactive withdrawal 6 months or a year (or more) after the fact, how does that factor in?

NSLDS expects schools to certify enrollment at least every two months. There are stipulations that schools should have mechanisms or controls in place to identify changes in enrollment status in a timely manner. For the scenario in your question, we suggest your institution have a formal policy that states the date of determination is the date the appeal committee makes their final determination. The procedures associated with this policy should ensure that the appropriate updates and notifications are made within your institution and the appropriate updates regarding the student are provided to the Clearinghouse. If the student is considered withdrawn for Title IV, the Clearinghouse advises the school report the “Withdrawn” status and effective date that align with the Department of Education’s definition of withdrawn. We also suggest that the financial aid office and registrar’s office align their definitions of enrollment statuses and effective dates.

As a community college, our students are required to submit a graduation application. If a student submits a graduation after the semester and we graduate them, what is considered too late? Is the date of determination for registrar's office or from an instructor not reporting in a timely manner?

There is no specific ED guidance surrounding timeline for date of determination. However, NSLDS expects schools to certify enrollment at least every two months and there are stipulations that schools should have mechanisms or controls in place to identify changes in enrollment status, in a timely manner. Typically, the date of determination is established as the date the financial aid or registrar’s office became aware of a change. The Clearinghouse advises schools report status changes via a scheduled enrollment file or Online Update on our secure site.

We are a Banner school, can we send both effective date and date of determination in our file?

There is no change to how you extract or report enrollment data to NSC. The only change with the [November 2017 version of the NSLDS Guide](#) is additional clarification on how to properly assess timeliness of reporting enrollment status changes. We suggest that you have procedures and/or policies in place that document how and when the date of determination is established. Your auditor will likely want to see those and ensure you are following them.

A student finishes in December, but doesn't graduate until February. We currently report them as withdrawn and then don't enter the "G" status until the degrees are awarded. Should we do this differently?

This reporting practice described appears to be in compliance with FSA's reporting expectations. The student is considered withdrawn after finishing the term in December and the school reports the student as withdrawn to Clearinghouse. Later in February, the school determines the student has graduated and reports the "Graduated" status to Clearinghouse in February. For this scenario, the "Graduated" status' date of determination is a date in February. The February date is the date the 60-day timeliness clock starts ticking.

Do you know if and when you may start reporting those retroactive withdrawals that we have reported to you to NSLDS? Right now, we are going to be manually updating it on NSLDS, but perhaps not all enrollment reporting staff have access to NSLDS?

For each student on the NSLDS Enrollment Roster, the Clearinghouse responds with the most recently certified enrollment record loaded into our database from the school in question. If a school chooses to update NSLDS directly for certain scenarios, we suggest they provide the Clearinghouse with the same update. We have plans in the near future to include multiple records for each student on the NSLDS responses. Further details will be provided when we have an expected delivery date.