



Processing and Reporting Changes in Student Enrollment Status Under Title IV

POLICY STATEMENT

Cornell University processes and reports changes in student enrollment status in a manner consistent with the requirements of Title IV of the Higher Education Act of 1965, as amended ("Title IV"). This policy establishes processes and expectations, and centralizes certain key compliance-related aspects of the associated processes.

REASON FOR POLICY

Cornell University must comply with Title IV when reporting changes in student enrollment status and returning unearned Title IV funds, where necessary, to avoid enhanced oversight and monitoring requirements by the U.S. Department of Education, loss or repayment of funds, or ability to participate in federal student aid programs. This policy aims to simplify processes and reduce administrative burdens while improving consistency of compliance with Title IV requirements. This policy is a component of the university's Title IV Financial Aid Compliance Program and interrelates with and supports other elements of that program.

◆**Note:** This policy pertains to students who are enrolled in degree-seeking and approved certificate programs that are eligible for federal student financial aid and whose enrollment status with the university changes, such as by graduating, taking a leave of absence, or withdrawing from the university. Students wishing to withdraw from courses in which they have enrolled should follow the school or college requirements.

ENTITIES AFFECTED BY THIS POLICY

Application of this policy is based on **the program in which a student is enrolled**, which may be administered from any of the following locations. The school/college in which a student is enrolled, whether based in Ithaca or Weill Cornell Medicine, is responsible for submitting student enrollment status changes. Follow procedures according to where the school/college/program is based.

- Ithaca-based locations
- Cornell Tech campus
- Weill Cornell Medicine campuses

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WHO SHOULD READ THIS POLICY

- Individuals in or supervising registrar, financial aid, bursar, or student services functions.
- Deans, associate deans, and others responsible for relevant academic unit policies and practices.
- Faculty and staff members interacting with students.
- Individuals in units charging student accounts.
- Individuals in units responsible for determining or recommending student leaves or withdrawals or certifying completion of a degree.

MOST CURRENT VERSION OF THIS POLICY

- www.dfa.cornell.edu/policy/policies/processing-and-reporting-changes-student-enrollment-status-under-title-iv

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RELATED RESOURCES

University Policies and Information Applicable to All Units of the University

[University Policy 4.5, Access to Student Information](#)

[University Policy 4.7, Retention of University Records](#)

[University Policy 5.10, Information Security](#)

[Campus Code of Conduct](#)

[Procedures for Resolution of Complainants Against Students Under Policy 6.4](#)

University Policies and Information Applicable to Only Ithaca-Based Locations and Cornell Tech

[University Policy 7.1, Voluntary Leave of Absence for Students](#)

[University Policy 7.2, Involuntary Student Leave](#)

[Health Leave of Absence, Cornell Health](#)

[Leaves of Absence and Withdrawal, Office of Financial Aid](#)

Policies on Satisfactory Academic Progress:

- [College of Agriculture and Life Sciences](#)
- [College of Veterinary Medicine](#)
- [Cornell Law School](#)
- [Federal Satisfactory Academic Progress – Policy for Undergraduate Financial Aid Applicants](#)
- [Johnson Graduate School of Management \(PDF\)](#)

School and college policies on leaves and withdrawals

[Tuition refund policy for leaves and withdrawals](#)

[University Academic Calendar](#)

[University Registration](#)

University Policies and Information Applicable to Only Weill Cornell Medicine Campuses

Weill Cornell Medicine Financial Aid Handbook

External Documentation

Family Educational Rights and Privacy Act of 1974 (FERPA)

[Federal Student Aid Handbook](#)

National Student Clearinghouse Enrollment Reporting Programming and Testing Guide

Title IV of the Higher Education Act of 1965, as amended

University Forms and Systems

Ithaca-Based Locations and Cornell Tech

[Cornell DropBox](#)

Cornell University Electronic Student Record Imaging System (CUESR)

[Courses of Study](#)

PeopleSoft (Student Information System)

Weill Cornell Medicine Campuses

Jenzabar (Student Information System)

WCM File Transfer Service

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CONTACTS – ITHACA-BASED LOCATIONS AND CORNELL TECH

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

Contacts, Ithaca-Based Locations and Cornell Tech

Subject	Contact	Telephone	Email/Web Address
Policy Clarification and Interpretation	Office of the University Registrar	(607) 255-4232	univreg@cornell.edu
Return of Title IV Funds	Financial Aid and Student Employment	(607) 255-5145	finaid@cornell.edu
Tuition Refunds	Office of the Bursar, Bursar Account Services	(607) 255-2336	uco-bursar@cornell.edu www.dfa.cornell.edu/bursar/students-parents/leaving

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CONTACTS – WEILL CORNELL MEDICINE CAMPUSES

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

Contacts, Weill Cornell Medicine Campuses

Subject	Contact	Telephone	Email/Web Address
Policy Clarification and Interpretation	Weill Cornell Medicine (WCM) Registrar	TBA	
Return to Title IV	WCM Office of Financial Aid	TBA	
Tuition Refunds			

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DEFINITIONS

These definitions apply to terms as they are used in this policy.

◆**Note:** For purposes of this policy, the terms “school” and “college” are used interchangeably.

Academically Related Activities	Activities that are academic in nature or directly relate to academic endeavors, as determined by the university. See the “Appendix.”
Date of Institutional Knowledge	<p>For students who utilize the official withdrawal process, the date the student or duly authorized representative began the official withdrawal process or officially notified the designated office of their intent to withdraw, whichever is later.</p> <p>For students who do not utilize the official withdrawal process or provide notification of their intent to withdraw, the date the university became aware that the student ceased attendance, as signified by a review of grades posted at the end of each term, following the grade posting due date. The university must determine the last date of attendance within 30 days after the end of (1) the payment period or the period of enrollment, (2) the academic year, or (3) the student’s educational program, whichever is earliest.</p> <p>For future-dated student withdrawals, the day after the last day of the term of enrollment (term end +1) or the student’s latest class end date, whichever is later.</p> <p>For students who graduate, the date a degree is posted (record is processed) in the student information system.</p> <p>This date is used as the starting point of certain Title IV reporting requirements including days to report enrollment to the National Student Loan Data System (NSLDS), days to return any unearned Title IV funds, and days to offer a post-withdrawal disbursement, if applicable.</p> <p>◆Note: Cornell is not required to take attendance. However, a school may use a documented last date of attendance in an academically related activity (see Procedures for determining dates of withdrawals).</p>
Designated Office	<p>The office designated by each school or college where students must provide formal notification of a desired leave or withdrawal from the university to begin the official withdrawal process and which is responsible for posting conferred degrees (graduations).</p> <p>◆Note: Units shall designate the school/college registrar or office of student services (or equivalent) as the designated office.</p>
Earliest Class Start Date	The scheduled start date of the student’s classes or the first day of the academic term, whichever is earlier.
Enrollment Status	<p>The status of a registered student with the university for academic enrollment purposes. The university recognizes four basic student enrollment statuses:</p> <ul style="list-style-type: none">• Enrolled (full time, three-quarter time, half time, less than half time)• Leave (considered a withdrawal for Title IV purposes)• Graduated• Withdrawn <p>For purposes of this policy, changes in student enrollment status that need to be reported under Title IV requirements include the following:</p> <ul style="list-style-type: none">• Voluntary leaves of absence (including health-related leaves) under University Policy 7.1, Voluntary Leave of Absence for Students

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DEFINITIONS, continued

	<ul style="list-style-type: none"> • Involuntary leaves of absence, including those under University Policy 7.2, Involuntary Student Leaves • Voluntary withdrawals • Required withdrawals • Graduations (degree conferrals)
Last Date of Attendance	<p>For students who utilize the official withdrawal process, the date the student or duly authorized representative began the official withdrawal process or officially notified the designated office of their intent to withdraw, whichever is earlier.</p> <p>Cornell is not required to take attendance. However, a school may use a documented last date of attendance in an academically related activity.</p> <p>For future-dated and between-term withdrawals, the day after the last day of the term of enrollment (term end +1) or the student's latest class end date, whichever is later.</p> <p>For withdrawals occurring during scheduled university breaks of five days or longer, the last day of scheduled instruction before the break.</p> <p>A student's last date of attendance is used to determine the percentage of the payment period or period of enrollment completed and, therefore, the amount of aid a student has earned via the Return of Title IV Funds (R2T4) calculation.</p>
Latest Class End Date	The scheduled end date of the student's classes or the last day of exams for the academic term, whichever is later.
Leave of Absence	<p>Involuntary</p> <p>The separation of a student from the university and its facilities that is prescribed by the vice president for student and campus life. See University Policy 7.2, Involuntary Student Leave.</p> <p>Voluntary</p> <p>A separation of a student from the university requested by the student. See University Policy 7.1, Voluntary Leave of Absence for Students.</p> <p>◆ Note: Cornell University does not process Title IV leaves of absence, and all academic leaves will be considered withdrawals for Title IV student aid purposes.</p>
National Student Clearinghouse (NSC)	A nonprofit, third-party processor under contract with Cornell University to process and report student enrollment data to the NSLDS.
National Student Loan Data System (NSLDS)	The U.S. Department of Education system to which student enrollment information and any changes therein, including (but not limited to) withdrawals, graduations and other changes in status (e.g., full-time to half-time), must be reported in a timely manner (e.g., within 60 days).
Official Notification	Notification provided by a student to the designated office of their intent to withdraw or take a leave of absence. Can be written (including electronic communications) or oral. If provided orally, the school should document the date and details of the conversation with the student.
Official Withdrawal Process	The process established by each school/college for students to request a voluntary student withdrawal by notification to the respective designated office. Refer to policies on leaves of absence and withdrawals for more information (see "Related Resources").
Registration, University	The official recognition of a student's relationship with the university and the basic authorization for a student's access to campus resources. To become registered, a student must:

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DEFINITIONS, continued

	<ul style="list-style-type: none">• Settle all financial accounts, including current semester tuition.• Satisfy New York State and university health requirements.• Have no registration holds from their college, Cornell Health, or the Bursar. <p>Enrollment in courses does not constitute or imply university registration.</p> <p>Students who do not meet the requirements for registration are withdrawn from the university at the beginning of the sixth full week of instruction.</p> <p>For students who fail to meet the requirements for registration, both the date of institutional knowledge and last date of attendance are the date the student is withdrawn from the university.</p>
Return of Title IV Funds (R2T4)	The required process to determine the earned and unearned portions of Title IV aid as of the established withdrawal date based on the amount of time an eligible student spent in attendance. After the 60% point in the payment period or period of enrollment, a student has earned 100% of Title IV funds they were scheduled to receive during the period.
Satisfactory Academic Progress	To be eligible for Title IV funds, a student must make satisfactory academic progress by meeting both the qualitative (grade-based) and quantitative (time-based) criteria described by their school. Refer to policies on Satisfactory Academic Progress for more information (see "Related Resources").
Student Information System	The primary administrative system where student information, including enrollment, status, and financial aid records, is housed and processed.
Term Begin Date	The scheduled start date of the term, as determined by the official (published) academic calendars for Ithaca and WCM.
Term End Date	The scheduled end date of the term, as determined by the official (published) academic calendars for Ithaca and WCM.
Title IV	Within the Higher Education Act of 1965 (as amended), Title IV is the section that covers student financial aid including associated regulatory compliance requirements, as promulgated by the U.S. Department of Education. As a recipient and lender of Title IV student financial aid funds, Cornell is subject to Title IV institutional requirements, including reporting of changes in student enrollment status.

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DEFINITIONS, continued

Withdrawal

Administrative Withdrawal

A withdrawal initiated by the university for failure to meet university registration requirements.

Retroactive Withdrawal

A student withdrawal that would impact a term that has already ended.

Required Withdrawal

A permanent separation of a student from the university that is required by university or school/college policy. Includes dismissals under the Campus Code of Conduct and required academic withdrawals under school/college policies.

Unofficial Withdrawal

Any withdrawal that does not follow the specific guidelines of this policy, including but not limited to, dropping all classes in a term without notifying college or failure to earn a passing grade in any course during a given term.

Voluntary Withdrawal

For purposes of this policy, a full and complete separation of a student from the university, at the student's request, which would require readmission and registration for future enrollment.

Withdrawal for Title IV Purposes

Any time a student does not complete all of the days in the term the student was scheduled to complete.

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RESPONSIBILITIES – ITHACA-BASED LOCATIONS AND CORNELL TECH

The following responsibilities apply to schools, colleges, or programs administered from Ithaca-based locations and Cornell Tech.

Academic Unit Faculty and Staff (including Academic Advisors)	Direct students who wish to withdraw or take a leave of absence to the unit designated office. Report student withdrawals or leaves of absence to the unit designated office within five days.
Cornell Health	Provide letters recommending health leave of absence to the unit designated office within two business days of notifying the student or duly authorized representative. For purposes of distributing health leave of absence letters, maintain contacts for all school/college designated offices and supervisors/associate deans, and verify/update such contacts at least annually.
Deans, Associate/Assistant Deans	Designate an office, e.g., Registrar or Student Services, within the school/college to which students must communicate requests to withdraw or take a voluntary leave from the university or withdraw from the university using the official withdrawal process. Establish or align existing unit-level policies pertaining to student leaves and withdrawals with this policy. Ensure unit faculty and staff members are appropriately aware of their responsibilities under this policy.
Judicial Administrator (or designee)	Provide notification of involuntary leaves (suspensions) and required withdrawals (dismissals) to the OUR within five business days of final determination.
Office of the Bursar	Pay to the student or student's parents/family any remaining Title IV credit balance funds within 14 days of the date the institution performs the Return of Title IV Funds (R2T4) calculation.
Office of Compliance for Financial Aid	Monitor awareness of and compliance with this policy as part of overall Title IV Financial Aid Compliance Program activities. Review relevant unit-level policies and procedures to ensure consistency with this policy. Conduct regular reviews of changes in student enrollment status (e.g. graduations, leaves of absence and withdrawals) reported to the National Student Loan Data System (NSLDS) in order to validate that reported dates are accurate, supporting documentation is sufficient and appropriate, and all necessary student enrollment status changes are reported timely (i.e., within 60 days of date of institutional knowledge). Conduct regular reviews of R2T4 calculations to validate that the amount of funds returned is accurate and that such funds are remitted to the U.S. Department of Education timely (i.e., within 45 days of the date of institutional knowledge). Investigate instances of noncompliance including root cause analysis to determine changes to associated business processes and internal controls necessary to prevent or detect such issues in the future. Notify appropriate parties, such as the Office of the University Registrar (OUR), Financial Aid and Student Employment (FASE), the vice provost for enrollment, the University Audit Office, and the Office of University Counsel, of identified noncompliance with Title IV requirements.

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RESPONSIBILITIES – ITHACA-BASED LOCATIONS AND CORNELL TECH, continued

Office of Financial Aid and Student Employment (FASE)

For processed student leaves and withdrawals, complete the R2T4 calculation to determine the earned and unearned portions of Title IV aid as of the student's last date of attendance in accordance with Title IV requirements.

In the student information system, revise the student's financial aid awards according to the R2T4 calculation.

For completed R2T4 calculations, remit necessary (unearned) funds to the U.S. Department of Education within 45 days of the date of institutional knowledge.

For completed R2T4 calculations pertaining to undergraduate and graduate (non-professional) students, communicate the revised award and exit interview requirements to the student.

Monitor compliance with R2T4 components of this policy. Develop and track R2T4 metrics (e.g., number of days to return unearned funds, number of errors identified in R2T4 calculation reviews).

Promptly notify appropriate parties, such as the vice provost for enrollment and the director of compliance for financial aid, of identified noncompliance.

Office of University Registrar (OUR)

Review and approve, or seek additional information related to, dates pertaining to student leaves of absence and withdrawals within five business days of submission by school/college designated offices. Verify that sufficient and appropriate documentation has been provided. Validate the requisite dates including earliest class start date, latest class end date, term begin date, term end date, last date of attendance, and date of institutional knowledge.

At the beginning of the sixth full week of instruction, identify students who fail to meet the requirements for registration and approve for withdrawal (subject to reinstatement upon meeting the registration requirements).

Process approved student leaves of absence and withdrawals and revise tuition in the student information system.

For approved changes in student enrollment status, notify the respective school/college and FASE of approved withdrawal dates, and notify units charging student accounts and other parties, as necessary.

Report changes in student enrollment status to the NSLDS in accordance with Title IV requirements, e.g., within 60 days of the date of institutional knowledge.

Correct any NSLDS enrollment data errors and resubmit to the NSLDS within 10 days. For student enrollment information reported via third-party processor (i.e., the National Student Clearinghouse), correct any data errors as soon as possible, and in all cases within 10 days.

Ensure unit designated offices are aware of their responsibilities under this policy and provide any necessary training.

Monitor the OUR and unit designated office compliance with this policy. Develop and track metrics including those related school/college submission of changes in student enrollment status (e.g., the number of days to submit, the number of incorrect dates submitted) and report to units as necessary, no less than annually.

Promptly notify appropriate parties, such as the vice provost for enrollment and the director of compliance for financial aid, of identified noncompliance.

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RESPONSIBILITIES – ITHACA-BASED LOCATIONS AND CORNELL TECH, continued

Professional School Financial Aid Offices	After FASE performs the R2T4 calculation, determine any revision needed for institutional aid, communicate the revised award and exit interview requirements to the student.
Unit Designated Offices (Registrar or Student Services)	<p>Process degree conferrals in the student information system by the OUR established degree posting deadline. Notify OUR immediately upon posting any degrees after the posting deadline, and upon posting a degree for a student who has been on leave.</p> <p>Within five business days of notification to the unit designated office (i.e., the date of institutional knowledge), report all student leaves and withdrawals to the OUR. Notify OUR regarding withdrawals that are significantly past due, more than 30 days after date of institutional knowledge.</p> <p>When deemed necessary, gather institutional documentation to support a student's last day of academically related activity.</p> <p>Ensure submitted student withdrawals and leaves of absence include all necessary and appropriate supporting documentation, such as a completed student withdrawal request form, a health leave of absence letter from Cornell Health, etc.</p> <p>Correct and re-submit within three business days student withdrawals and leaves of absence with any additional or updated documentation supporting the dates as required by the OUR.</p> <p>To support the date of institutional knowledge, date/time-stamp all letters or other documentation supporting changes in student enrollment status to support the date that such documentation was received. For all electronic communications, the date of the electronic communication will support the date of institutional knowledge.</p> <p>Consult with the offices of the University Registrar and Financial Aid and Student Employment prior to approving any retroactive withdrawals.</p>
Units Charging Student Accounts	<p>Within 10 business days of notification of changes in student enrollment status, review, adjust and remove (as necessary) charges to student accounts.</p> <p>Units charging student accounts include, but are not limited to, the following:</p> <ul style="list-style-type: none">• Academic Units (e.g., course fees, lab fees)• Bursar• Cornell Athletics• Cornell Health• Cornell Store• Cornell University Library• Dining• Fraternities and sororities• Housing
Vice President for Student and Campus Life (or Designee)	Provide notification of involuntary student leaves under University Policy 7.2, Involuntary Student Leaves to the appropriate unit designated office and the OUR within five business days of such determination.
Vice Provost for Enrollment	Oversee implementation of this policy and ensure all responsibilities established herein are carried out properly and consistently.

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Provost for Enrollment
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RESPONSIBILITIES – ITHACA-BASED LOCATIONS AND CORNELL TECH, continued

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PRINCIPLES

Overview

This policy pertains to students who are enrolled in degree-seeking and approved certificate programs that are eligible for federal student financial aid and whose enrollment status with the university changes, including graduations, leaves of absence (voluntary and involuntary), and official and unofficial withdrawals (voluntary, involuntary, and administrative) from the university. Students wishing to withdraw from courses in which they have enrolled should follow the school or college requirements.

◆**Note:** For students enrolled in dual-degree programs involving Ithaca and Weill Cornell Medicine (WCM), including dual-degree programs at Cornell Tech, the college in which the student is enrolled is responsible for submitting student enrollment status changes.

Timely and accurate processing of changes in student enrollment status is critical to maintaining compliance with federal Title IV requirements. Schools and colleges must report all student enrollment status changes (e.g. graduations, leaves of absence and withdrawals from the university) timely. For student withdrawals and leaves of absence, schools and colleges must provide appropriate documentation supporting the relevant dates to the Office of University Registrar (OUR) or the Office of the WCM Registrar. Those offices are responsible for approving dates (for withdrawals and leaves of absence), processing students' records, notifying appropriate units of approved changes in student enrollment status, as necessary, and reporting to the U.S Department of Education in accordance with Title IV requirements. The Office of Financial Aid and Student Employment (FASE), or the WCM Office of Financial Aid, is responsible for determining and remitting appropriate amounts to be returned under Title IV in accordance with required timelines.

Commitment to Title IV Financial Aid Compliance

Cornell is committed to upholding its obligations with respect to all applicable laws and regulations, including compliance requirements of federal programs in which it participates, such as Title IV student financial aid. Such compliance is critical to continuing the financial support of students through federal student aid funds made available through Title IV programs. This commitment is embodied in the following statement of objective, as endorsed by the university president, provost and executive vice president and chief financial officer:

“Cornell University strives to achieve consistent compliance with Title IV financial aid regulations and requirements.”

Requirements of a Non-Attendance Taking University

As determined by its primary accreditation body, the Middle States Commission on Higher Education, Cornell University is not required or expected to take attendance in academically related activities such as lectures, discussions, labs, or studios. Therefore, the university is required to follow U.S. Department of Education

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PRINCIPLES, continued

guidance pertaining to institutions that are not required to take attendance, which may differ in some key respects from institutions that are required to take attendance. For more information, refer to the Federal Student Aid (FSA) Handbook.

Consistent Treatment of All Students Under this Policy

While many students at Cornell University do not receive Title IV federal student aid, processing and reporting of all changes in student enrollment status are to be treated and determined consistent with this policy.

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PROCEDURES – ITHACA-BASED LOCATIONS AND CORNELL TECH

The following procedures apply to schools, colleges, or programs administered from Ithaca-based locations and Cornell Tech.

Communicating Student Withdrawals and Leaves of Absence

For students who wish to take a leave of absence or withdraw from the university, direct them to the unit designated office. Faculty and staff members who become aware that a student has taken a leave or withdrawn from the university should communicate to the respective unit designated office.

Designating a Unit Office

Each academic unit subject to this policy must designate an office/function within the school/college, such as Registrar or Student Services, to which students must communicate requests to take a voluntary leave or withdraw from the university using the official withdrawal process. The unit designated office is also responsible for posting graduations (degree conferrals) in the student information system.

Units must establish or align unit-level policies pertaining to this university policy.

Schools and colleges are responsible for ensuring that all necessary faculty and staff members are aware of their responsibilities under this policy, such as notifying the unit designated office of any student withdrawals on a timely basis.

Determining Dates for Withdrawals and Leaves of Absence

Dates associated with student leaves and withdrawals directly impact tuition adjustments, enrollment and grades, Title IV compliance, and reporting to the National Student Clearinghouse (NSC) and the National Student Loan Data System (NSLDS). As such, accuracy in determining dates is of utmost importance.

Last Date of Attendance

For students who utilize the official withdrawal process, use the earlier of the date the student (or duly authorized representative):

- Began the school/college official withdrawal process.
- Officially notified the designated office of their intent to withdraw.

For required withdrawals, use the date the university notifies the student.

If the unit designated office is provided with documentation from an instructor, committee chairperson, or another individual that indicates participation in academically related activities, the dates on the documentation must be used to determine the last date of attendance.

◆ **Note:** Student self-certification of last day of attendance is insufficient for confirming last day of participation in academically related activities.

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PROCEDURES – ITHACA-BASED LOCATIONS AND CORNELL TECH, continued

For students who completed the term and between-term withdrawals, use the day after the last date of the term of enrollment or latest class end date, whichever is later.

For withdrawals occurring during scheduled university breaks, use the last day of scheduled instruction before the break.

Date of Institutional Knowledge

For students who utilize the official withdrawal process, use the later of the date the student (or duly authorized representative):

- Began the school/college official withdrawal process.
- Officially notified the designated office of their intent to withdraw.

For students who do not utilize the official withdrawal process, use the date that the school/college became aware that the student ceased attendance or participation in academically related activities.

◆**Note:** Designated offices and associate deans are encouraged to consult with the Office of University Registrar with any questions around the determination of dates pertaining to student withdrawals.

Documenting Withdrawals and Leaves of Absence

All student withdrawals and leaves must be supported by adequate, relevant documentation such as approved leave/withdrawal form, letters (e.g., academic action letter, health leave of absence letter), emails, or other appropriate documents. Supporting documentation must clearly indicate the student's name and school/college and last date of attendance or the date the student began the withdrawal process or otherwise provided official notification they were withdrawing. To support the date of institutional knowledge, date/time-stamp all letters or other documentation to indicate the date received. For electronic communications, the date stamp of the electronic communication will support the date of institutional knowledge. If a student provides official notification of withdrawal orally, the school should document the date and conversation with the student.

Unit designated offices and associate deans are encouraged to consult with the Office of University Registrar with any questions related to documentation.

All necessary supporting documentation must be stored in the electronic student record imaging system (CUESR) and retained in accordance with University Policy 4.7, Retention of University Records.

◆**Note:** Documentation containing sensitive or confidential information, such as medical diagnoses or grades, should be handled in accordance with university policy requirements, including University Policy 5.10, Information Security. Medical

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PROCEDURES – ITHACA-BASED LOCATIONS AND CORNELL TECH, continued

diagnosis documentation should not be included in student withdrawal documentation.

Unofficial Withdrawals

When a student ceases to participate in a course, but has not provided official notification of withdrawal, the student will be considered unofficially withdrawn. Additionally, due to regulatory requirements, the Office of Financial Aid may consider a student to be unofficially withdrawn if the student does not receive a passing grade for any of attempted courses in a term.

If a student is unofficially withdrawn, any financial aid the student receives may be adjusted according to federal and state regulations, and university policy.

Examples of unofficial withdrawals include:

- A student enrolls but does not attend classes, which may result in a failing grade of U, UX, or F and outstanding tuition charges.
- A student drops all enrolled classes within a term and fails to notify the student's college.
- A student does not enroll for one or more terms and loses automatic registration eligibility.

A student earns non-passing grades for all courses within a term.

Submitting and Approving Withdrawals and Leaves of Absence

Unit designated offices must submit withdrawals and leaves via the Student Information System for approval of dates by the OUR within **five business days** of when the designated office is notified of the withdrawal (i.e., the date of notification).

The judicial administrator, or a designee, must provide notification to the OUR within **five business days** of final determination of suspension or dismissal of a student.

The vice president for student and campus life, or a designee, must provide notification to the OUR within **five business days** of final determination of involuntary student leaves.

Cornell Health must provide health leave of absence letters to the respective unit designated office within **two business days** of notifying the student or duly authorized representative of a recommended health leave. For distributing health leave of absence letters, Cornell Health must maintain and verify regularly (at least annually) contacts with unit designated offices and corresponding supervisors/associate deans.

The OUR will review and approve, or seek additional information related to, submitted withdrawal and leave requests within **five business days**. For submitted

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withdrawals and leaves, the OUR is responsible for verifying that sufficient and appropriate documentation has been provided and validating key dates associated with the withdrawal, including the following:

- Earliest class start date
- Latest class end date
- Term begin date
- Term end date
- Last date of attendance
- Date of institutional knowledge

Unit designated offices have **three business days** to resubmit any corrected student withdrawals with any additional or updated supporting documentation as required by the OUR.

Processing and Reporting Withdrawals and Leaves of Absence

In the Student Information System, the OUR will process approved student withdrawals and leaves of absence and revise tuition as necessary. The OUR is responsible for reporting student withdrawals and leaves to the NSLDS within 60 days of the date of institutional knowledge. In reporting student enrollment data to the NSLDS, all data errors must be corrected as soon as possible, and in all cases within 10 days.

Processing Retroactive Withdrawals and Leaves of Absence

A retroactive withdrawal or leave is one that would impact a semester that has already ended. Before approving a retroactive withdrawal or leave, the school/college registrar or associate dean must consult with the OUR and the Office of Financial Aid and Student Employment (FASE).

Processing Requests for Future-Dated Student Withdrawals and Leaves of Absence

On occasion, a student will indicate their intention to withdraw or take a leave of absence at a future date; for example, undergraduates who are taking the next semester off. In these cases the last date of attendance and date of notification must be the same and must be dated the day after the last day of the term of enrollment (term end +1) or the student's latest class end date, whichever is later. Future-dated withdrawals and leaves should be submitted by the school/college by the end of the current semester.

Returning Title IV Funds

Once a student withdrawal or leave is approved and processed in the student information system, FASE must complete the Return of Title IV Funds (R2T4)

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calculation, in accordance with Title IV requirements, to determine the earned and unearned portions of Title IV aid as of the student's last date of attendance.

Next, FASE will revise the student's awards in the student information system, according to the R2T4 calculation. FASE will then remit necessary (unearned) funds to the U.S. Department of Education within 45 days of the date of institutional knowledge.

For undergraduate and graduate (non-professional) students, FASE must communicate the revised award and exit interview requirements to the student.

For professional students, after FASE performs the R2T4 calculation, the respective professional school's office of financial aid must determine any revision needed for institutional aid and communicate the revised award and exit interview requirements to the student.

Adjusting Student Accounts

After processing changes in student enrollment status, the OUR must provide notification to units charging student accounts, which have 10 business days to review, adjust and remove (as necessary) charges to student accounts.

The Office of the Bursar must pay to the student or student's parents/family any remaining Title IV credit balance funds within 14 days of the date the R2T4 calculation is completed.

Implementing the Policy and Monitoring Compliance

The vice provost for enrollment oversees implementation of this policy including whether all responsibilities established herein are carried out properly and consistently.

The OUR is responsible for ensuring that individuals in unit designated offices are aware of their responsibilities under this policy and providing any necessary training. The OUR will monitor compliance with this policy, in part by developing and tracking submission metrics by school/college, such as the number of days to submit changes in student enrollment status and the number of submissions with incorrect dates, to be reported to units as necessary, at least annually. If noncompliance is identified (e.g. late reported or inaccurate student enrollment status data), the OUR must promptly notify the appropriate parties, such as the vice provost for enrollment and the Office of Compliance for Financial Aid.

FASE is responsible for ensuring that individuals in professional school financial aid offices are aware of their responsibilities under this policy and providing any necessary training. FASE is responsible for monitoring R2T4-related components of this policy, including the establishment of metrics, such as the number of days to return unearned funds and the number of errors identified in R2T4 calculation

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reviews. If noncompliance is identified (e.g. incorrect amount of funds returned), FASE must promptly notify the appropriate parties, such as the vice provost for enrollment and the director of compliance for financial aid.

The Office of Compliance for Financial Aid plays an important role overseeing compliance with this policy by:

- Monitoring awareness of and compliance with this policy, in conjunction with overall Title IV Financial Aid Compliance Program activities.
- Reviewing relevant unit-level policies and procedures to ensure consistency with this policy.
- Conducting regular reviews of changes in student enrollment status reported to the NSLDS to validate the accuracy of reported dates, sufficiency and appropriateness of supporting documentation, and timely reporting of all necessary changes in student enrollment status (within 60 days of the date of institutional knowledge).
- Conducting regular reviews of R2T4 calculations to validate accuracy of the amount of funds returned and timely remittance of unearned funds to the U.S. Department of Education (within 45 days of the date of institutional knowledge).
- In conjunction with the University Audit Office, investigating instances of noncompliance including root cause analysis to determine changes to associated business processes and internal controls necessary to prevent or detect such issues in the future.

The Office of Compliance for Financial Aid is responsible for reporting instances of noncompliance to appropriate parties, including the OUR, FASE, the vice provost for enrollment, the University Audit Office, and the Office of University Counsel.

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APPENDIX

Academically Related Activities

Academically related activities include, but are not limited to, the following:

- Physically attending a class where there is opportunity for direct interaction between instructor and students.
- Submitting an academic assignment (paper or electronic).
- Taking an exam, defending a thesis or dissertation, completing an interactive tutorial, or participating in computer-assisted instruction.
- Attending a study group assigned by the school.
- Participating in an online discussion about academic matters.
- Initiating contact with a faculty member or instructor to ask a question about the academic subject studied in the course.
- Participating in assistantship programs such as graduate assistantship (GA), graduate research assistantship (GRA), research assistantship (RA), and teaching assistantship (TA). *Graduate Students only.*
- Conducting academic research under the mentorship or leadership of a faculty member.

Academically-related activities do not include activities where a student may be present but not academically engaged, such as:

- Living in institutional (e.g., on-campus) housing.
- Participating in a meal plan.
- Logging into an online class without active participation.
- Participating in a student-organized study group.
- Participating in academic counseling or advising.

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