



## Session 29

# Pell Policy Update

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# Overview

- 2006 Budget
- Reauthorization Proposals
- Hurricane Relief
- Common Payment Problems
- Types of EFCs
- Student Eligibility: Receipt of SAR or ISIR
- Initial Calculation of Federal Pell Grant
- Recalculation for Changes in Enrollment Status
- Appendices:
  - Additional Recalculation Case Studies
  - Recalculation Q's and A's





# 2006 Budget





# 2006 Budget

(In thousands of dollars)	D* / M	2005 Appropriation	2006 President's Request	2006 House	2006 Senate	Final Appropriation
Appropriation	D	12,364,997	13,199,000	13,383,000	13,177,000	
Incremental \$100 increase	M	0	420,000	0	0	
Shortfall	M	0	4,300,821	4,300,000	4,300,000	
State Scholars	D	0	33,000	0	0	
Maximum (In whole dollars)		4,050	4,150	4,100	4,050	
Recipients		5,330,000	5,468,000	5,463,000	5,445,000	

\* D: discretionary  
M: mandatory





# Reauthorization Proposals





# Reauthorization Proposals

Federal Pell Grant Proposals	President's Budget	House (HR 609)	Senate (S 1614)
Use mandatory funds for increased awards	Yes	No	Yes*
Eliminate tuition sensitivity	Yes	Yes	Yes
Index minimum award	Yes	No	Yes
Require two awards be available in an award year	Yes	Yes	Yes

\* PROGap (Provisional Grant Assistance Program)





# Reauthorization Proposals

Federal Pell Grant Proposals	President's Budget	House (HR 609)	Senate (S 1614)
Limit periods of eligibility	Yes	Yes	Yes
Ineligible: involuntary civil commitment for sexual offenses	No	Yes	No
State Scholars	Yes	Yes	No





# Reauthorization Proposals

Other Proposals Affecting Pell Awards	President's Budget	House (HR 609)	Senate (S 1614)
Academic year definition	No	Yes	Yes
Need Analysis	No	Yes	Yes







# Hurricane Relief





# Hurricane Relief

- GEN-04-04 – General guidance in case of disaster
- Announcements
- Legislation





# Common Payment Problems





# Common Payment Problems

- To avoid problems:
  - Must pay eligible less-than-half-time students.
  - Must pay eligible summer students.
  - When prorate in payment calculations, does not reduce the Scheduled or Annual Award.
  - Do not convert fractions to decimals in payment calculations.
  - When multiplying a fraction times a number, multiply numerator times number then divide.





# Common Payment Problems

- To avoid problems:
  - For nonterm and clock-hour programs, must determine how long it takes most full-time students to complete the hours in the lesser of the academic year or program for the numerator of the first step of calculating the payment for the payment period.
  - Must apply the prior bullet even if you do not have full-time students.





# Types of EFC





# Types of EFC

- Different program requirements use different types of EFCs.
- Type is based on quality of data, method of calculation, and program requirements.
- All are Federal Methodology EFCs.
- Four types include:
  - EFC from valid SAR or valid ISIR
  - Official EFC
  - ED-product EFC
  - 3<sup>rd</sup> party EFC





# Types of EFC

- EFC from valid SAR or valid ISIR
  - EFC from a SAR or ISIR on which all the information used to calculate the EFC is accurate.
- Official EFC
  - EFC computed by the CPS, i.e., an EFC on a SAR or ISIR that is not a reject







# Types of EFC

- ED-product EFC
  - EFC from a SAR or ISIR, FAA Access, or FOTW
- 3<sup>rd</sup> party EFC
  - Non-ED EFC, e.g., a third-party software compute





# Student Eligibility: Receipt of SAR or ISIR





# Student Eligibility

- Cash management requirements affect student eligibility.
- SAR or ISIR establishes a student's eligibility if it—
  - Has an official EFC, and
  - Is processed before student ceases to be enrolled.
- An institution must disburse an eligible student's Title IV aid.
- Pell also requires disbursement (§690.61(a)).





# Student Eligibility

- Use “**Processed Date**” in an ISIR as date of receipt
- Do **not** use other dates in an ISIR:
  - Date ISIR Received
  - Transaction Receipt Date
  - Application Receipt Date
- Do **not** use an institutional receipt date





# Student Eligibility

- SAR or SAR Acknowledgement may document a processing date.
  - Use if institution not listed on a CPS transaction processed prior to a student ceasing to be enrolled
- The processing date is—
  - On a SAR, the date above the EFC on the first page, and
  - On a SAR Acknowledgement, the “transaction process date” in school use box





# Student Eligibility

- 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))





# Initial Calculation of Federal Pell Grant



START HERE  
GO FURTHER

FEDERAL STUDENT AID



# Initial Calculation

- An **initial calculation** is the first calculation of a student's Federal Pell Grant award.
- The institution must use the current, documented enrollment status (may be a projected status).







# Initial Calculation

- For Pell, documentation of enrollment status may be:
  - Some indication from student, e.g., admissions application or FAFSA
  - 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.





# 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 the Web EFC





# Date of Initial Calculation

- Initial calculation may be prior to, during, or after attendance in classes.
- Valid SAR or valid ISIR is not necessary.
- It is not an initial calculation if use of a non-ED-generated EFC, e.g., a Federal Methodology EFC generated by a private vendor.





# 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 and compute 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 is half-time
  - Must use half-time for initial calculation





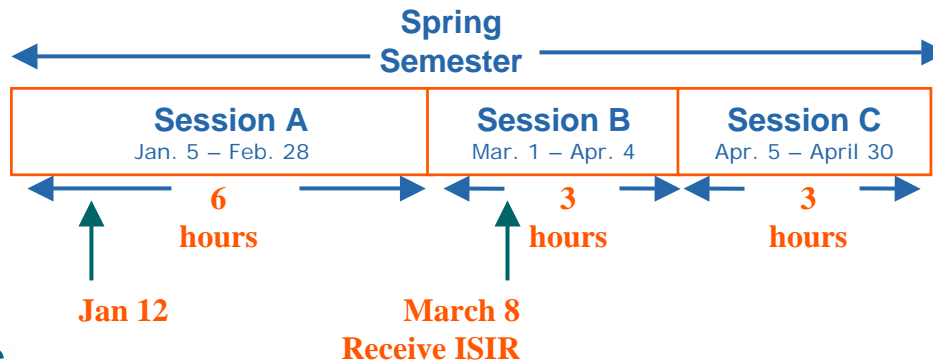
# Date of Initial Calculation

- If no date documented, the date of the initial calculation is the later of:
  - Processed Date of the initial SAR or ISIR, or
  - The date the student enrolls.
- If date documented for a student, the date of initial calculation is:
  - Date use an ED-product EFC, or
  - A later date.

**Reminder:** if packaging other Title IV aid and have an ED-product EFC, also performing a Pell calculation



# Initial Calculation Case Study #1

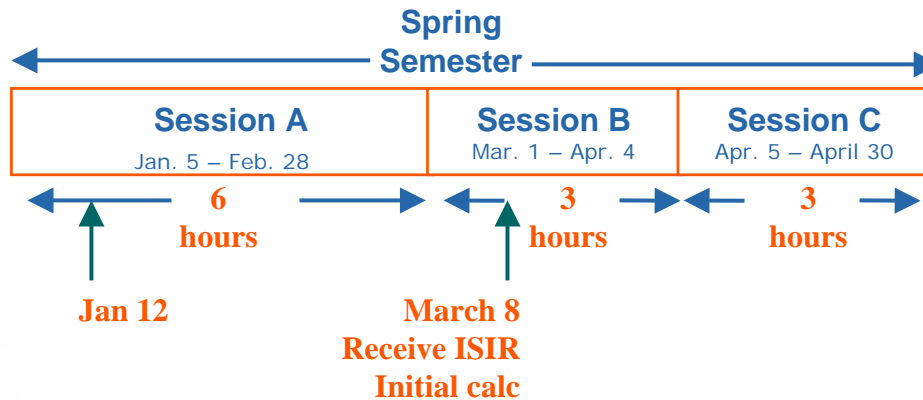


- Conditions

- 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.



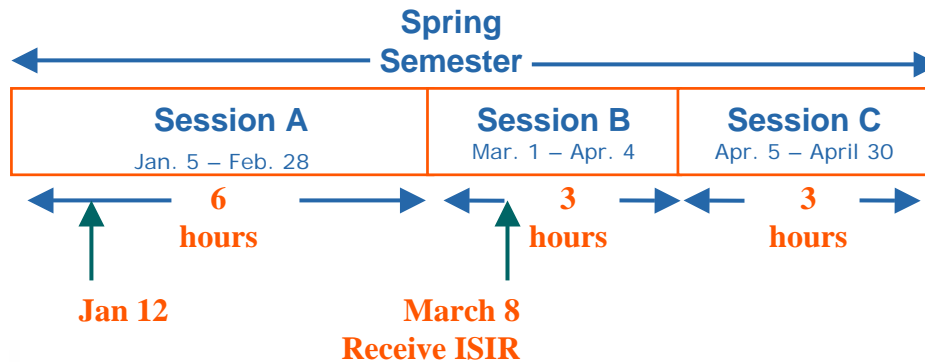
# Initial Calculation Case Study #1



- 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 C as it is past the census date.

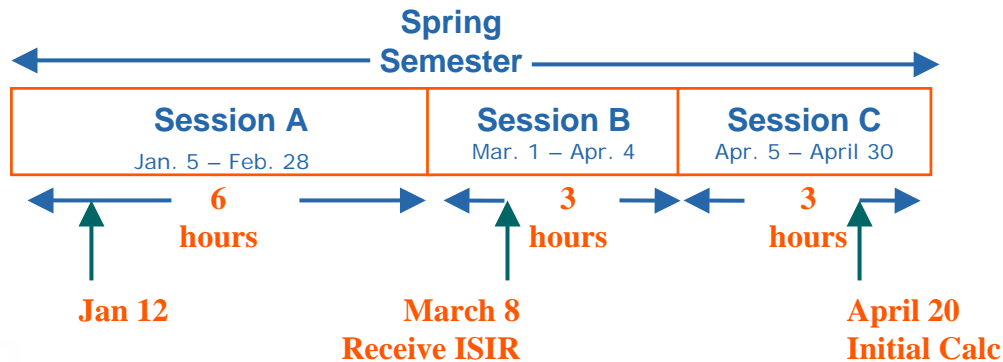
# Initial Calculation Case Study #2



- 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.



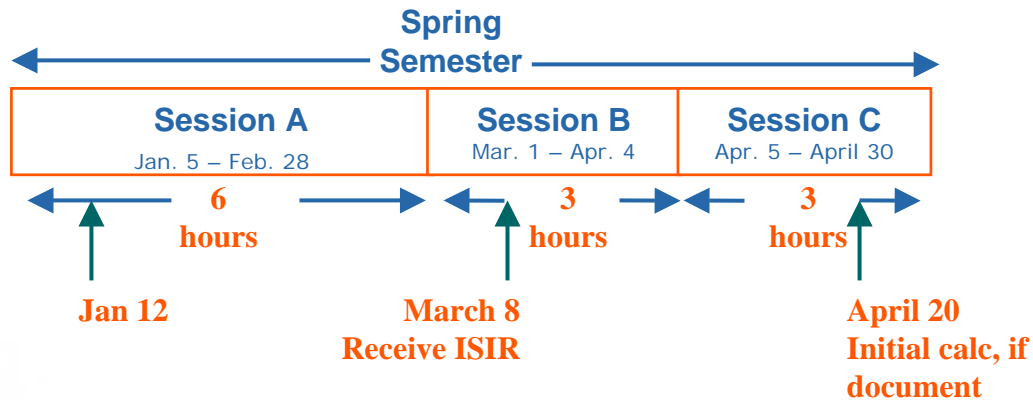
# Initial Calculation Case Study #2



- 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 for Changes in Enrollment Status: Required**





# Required Recalculation

- Enrollment status changes between terms (§690.80(b)(1)).
- Student never begins attendance in one or more classes (§690.80(b)(2)(ii)).





# Required Recalculation

- Lump sum payment according to work completed in prior payment periods (§690.76(b))
  - 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 for Changes in Enrollment Status: Institutional Options**





# Institutional Options

- Institutional Options for Recalculations for Changes in Enrollment Status
  - 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

- May have a census date
  - For term
  - By course
    - A student's ultimate census date for the term is the census date of the last course the student attends or is expected to attend
- 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

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





# **Recalculation for Changes in Enrollment Status:**

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





# Valid SAR/ISIR and New EFC

- Receipt of a valid SAR or valid ISIR after an initial calculation with a new EFC requires recalculating a student's award.
- Enrollment status used after an initial calculation depends on whether
  - SAR/ISIR is received in the term, and
  - A disbursement has been made for a prior term.





# Valid SAR/ISIR and New EFC

- No disbursement for a term has 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





# Valid SAR/ISIR and New EFC

- 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.



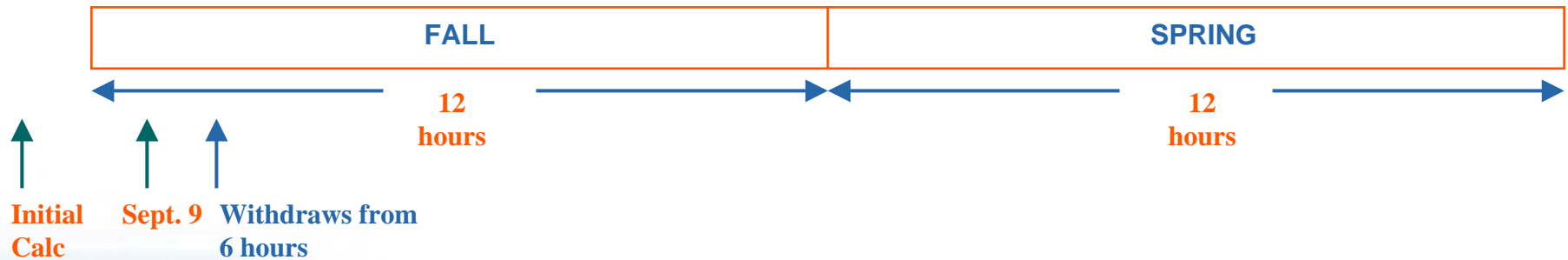


# **Recalculation for Changes in Enrollment Status: Case Studies**





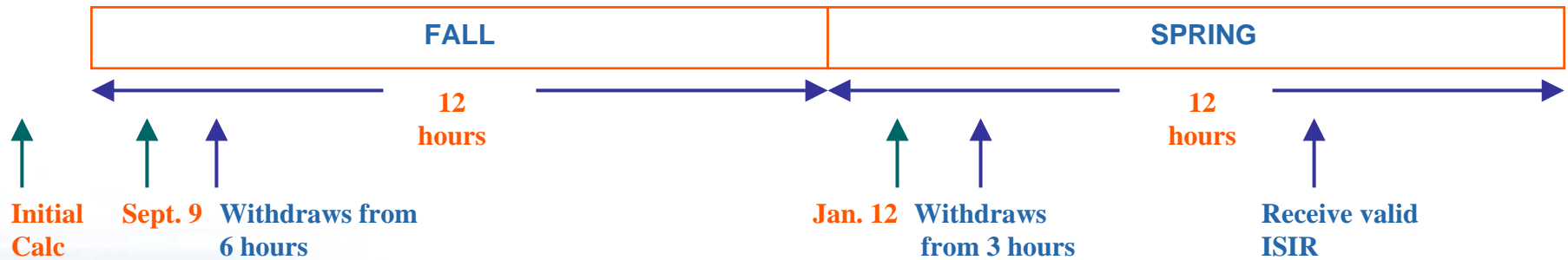
# Recalculation Case Study #1



- 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.

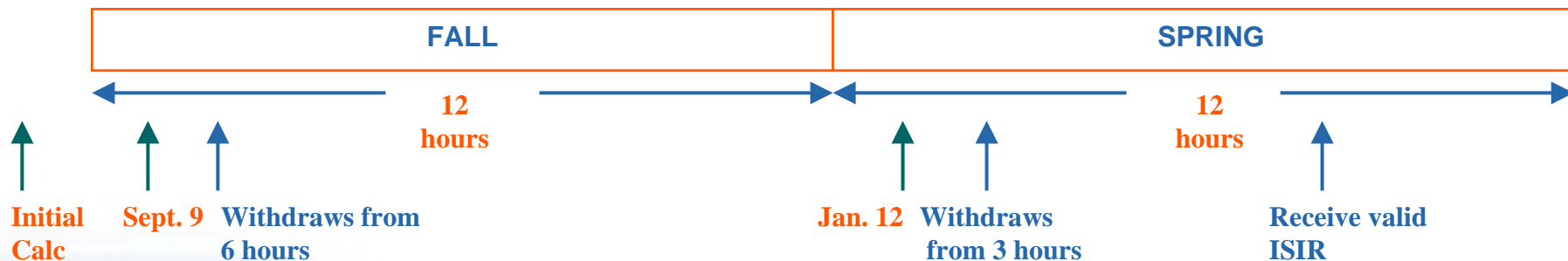
# Recalculation Case Study #1



- 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.

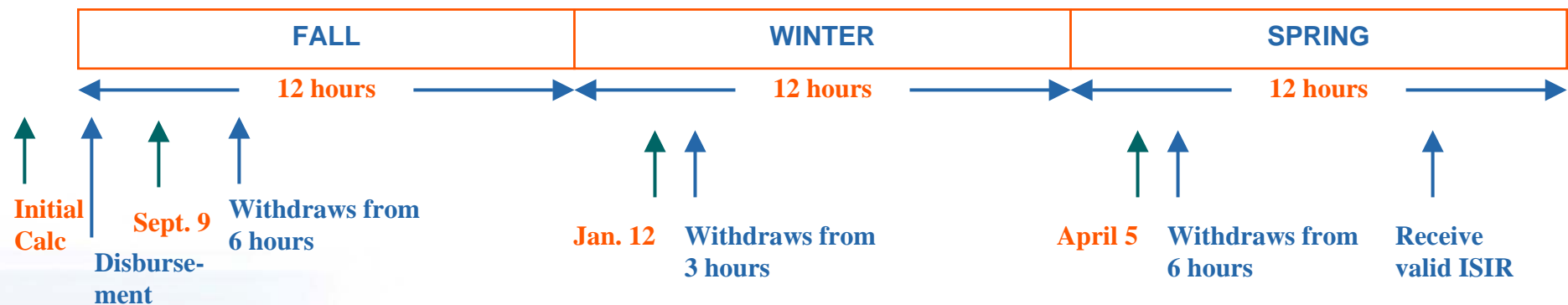
# Recalculation Case Study #2



- 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.

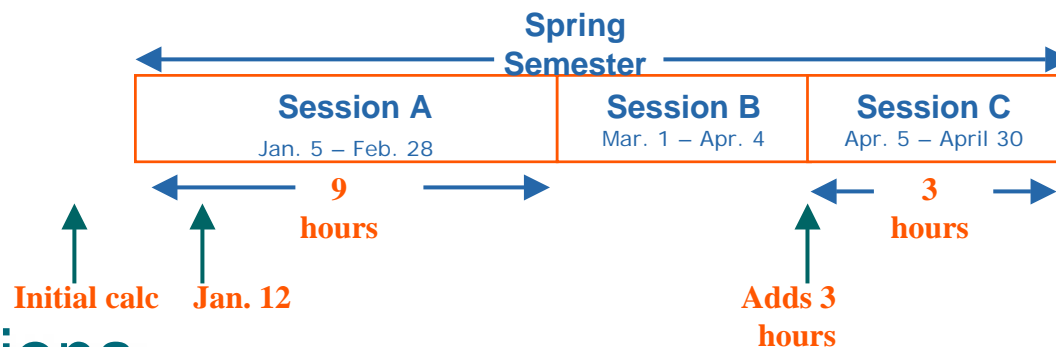
# Recalculation Case Study #2



## • 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



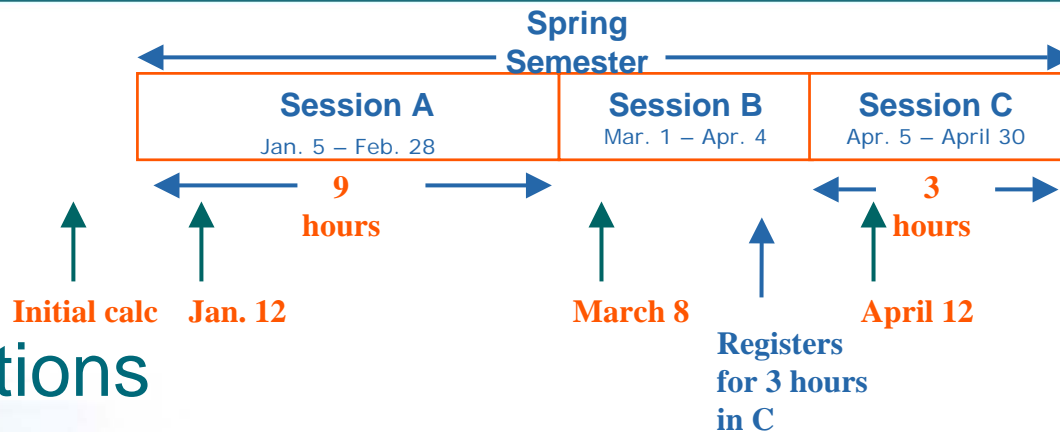
- Conditions

- 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.

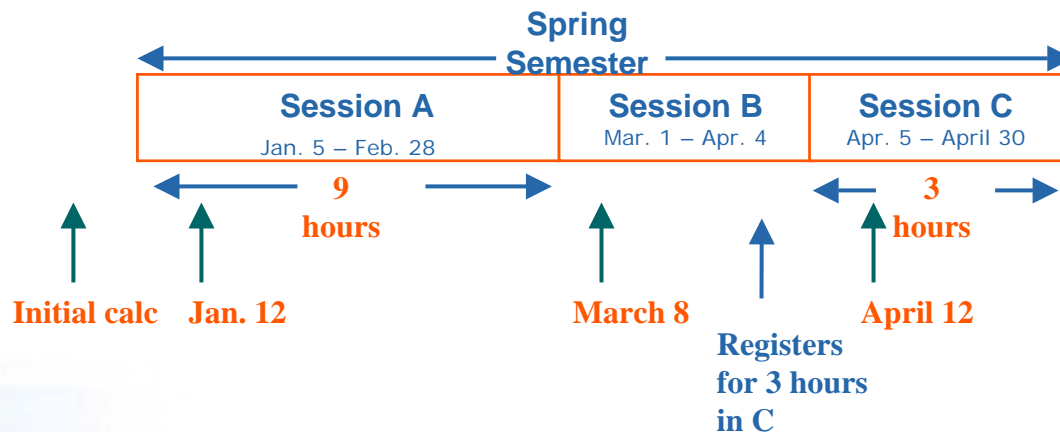
# Recalculation Case Study #4



- **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.

# Recalculation Case Study #4



## • Results

- The institution must recalculate the student's award based on the April 12 census date.
- If the student is attending Session C on April 12, the student's effective enrollment status for the term is full-time.
- If the student does not start class in Session C or drops the class before April 12, the student remains three-quarter time.





# Contact Information

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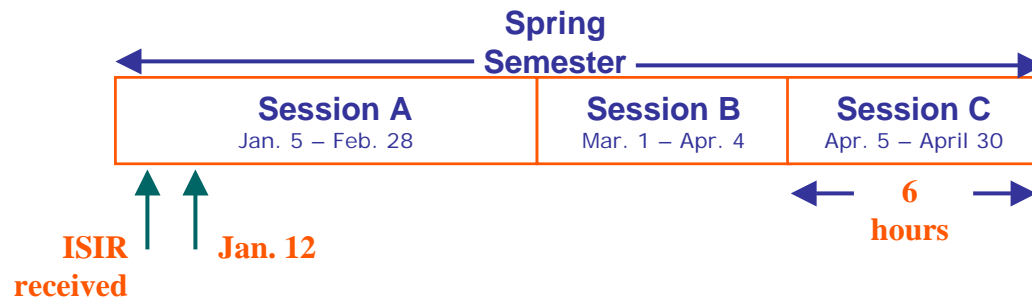
# Appendix

## Additional Recalculation Case Studies





# Case Study #1

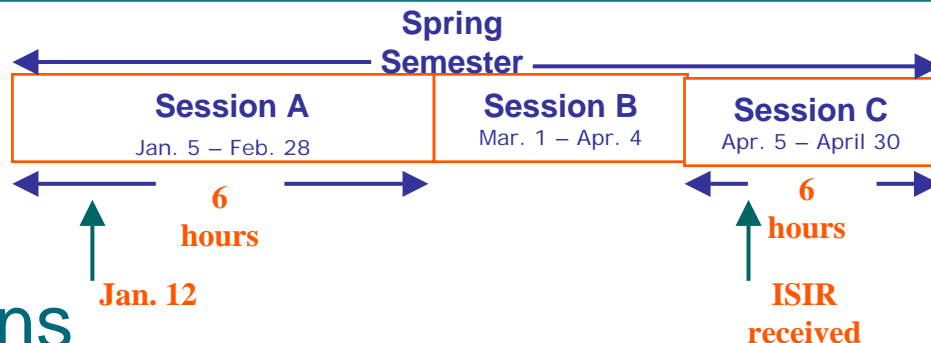


- Conditions
  - Institution has a single census date of January 12.
  - Institution received ISIR with January 5 processing date.
  - Student subsequently enrolls for 6 hours in Session C.
  - At the beginning of Session C, institution initially calculates the award and documents that date.
- Result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





# Case Study #2



- **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.

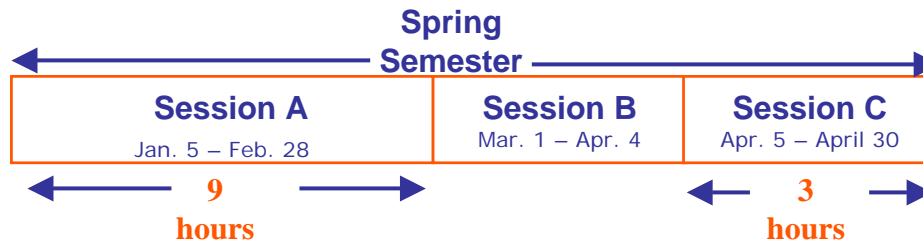
- **Result**

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





# Case Study #3



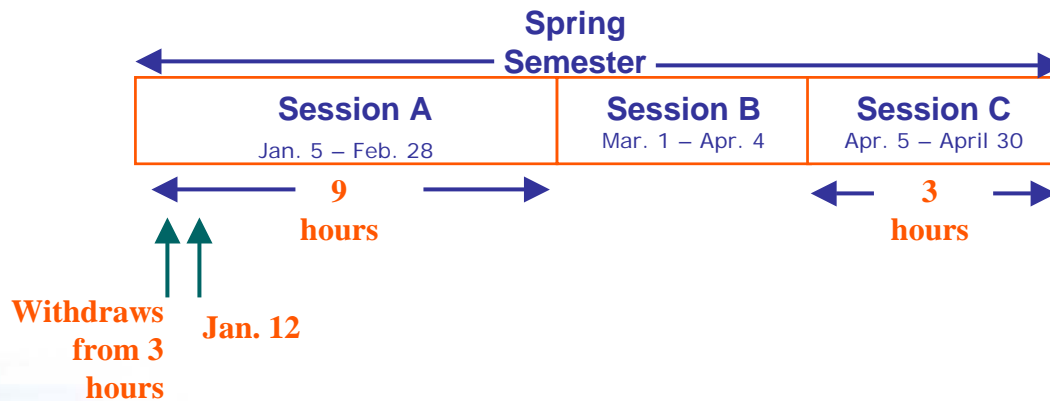
- General Conditions

- 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.





# Case Study #3



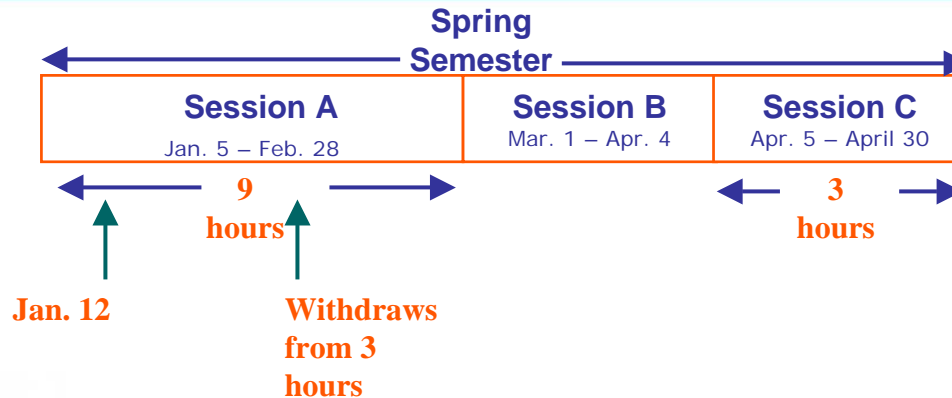
## Scenario One

- 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.





# Case Study #3



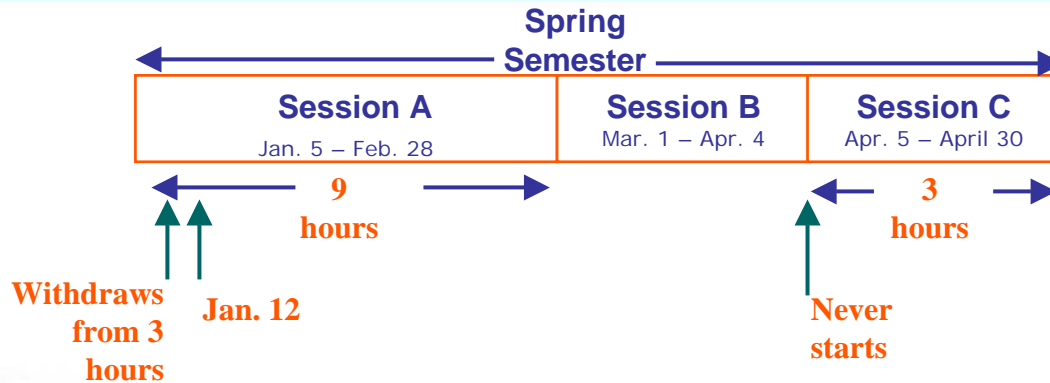
## Scenario Two

- **Condition**
  - Student withdraws from 3 hours after January 12 and later attends Session C.
- **Result**
  - At census date student is a full-time student.





# Case Study #3



## Scenario Three

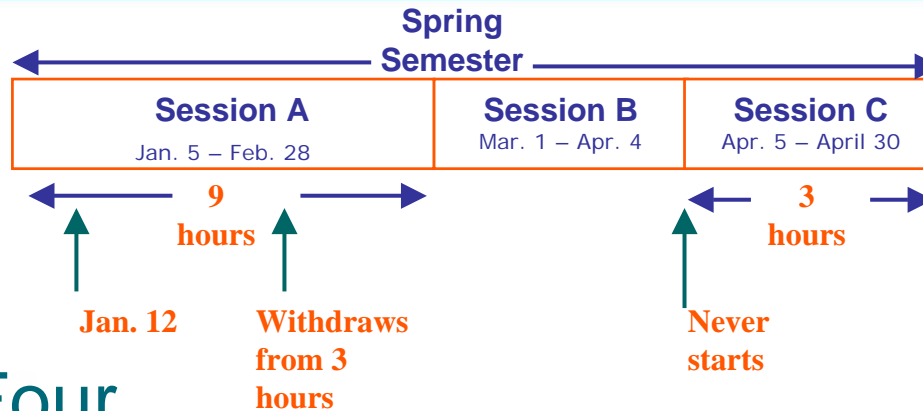
- Condition
  - Student withdraws from 3 hours prior to January 12 and never attends Session C.
- Result
  - At census date student is a three-quarter time student. However, the award must again be recalculated but as a half-time student when the student never starts attendance in the three hours of Session C.







# Case Study #3



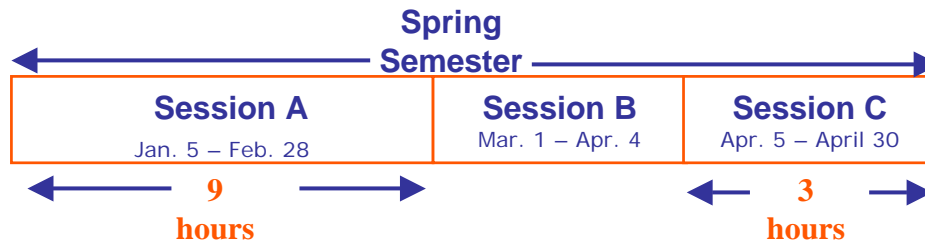
## Scenario Four

- 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.





# Case Study #4

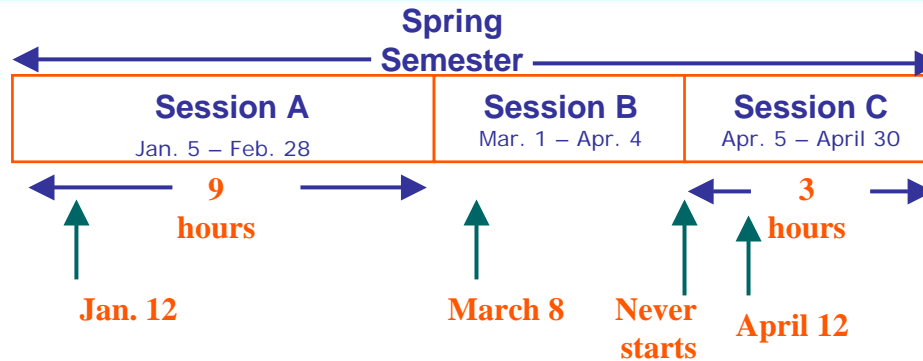


- General Conditions
  - Spring semester has compressed coursework over three sessions.
  - Institution has a census date for each session: January 12, March 8, and April 12.
  - Student enrolls for 12 hours at the beginning of the term: 9 in session A and 3 in Session C
  - Case assumes the initial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





# Case Study #4



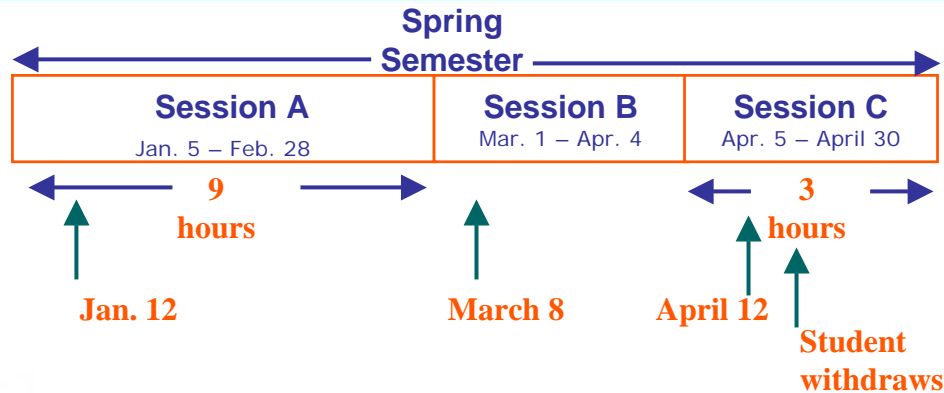
## Scenario One

- Conditions
  - Student never attends Session C.
- Result
  - The award must be recalculated as a three-quarter-time student.





# Case Study #4



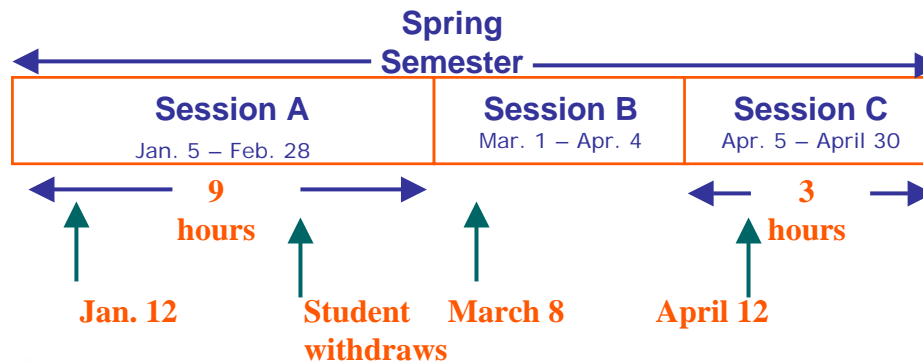
## Scenario Two

- 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.





# Case Study #4



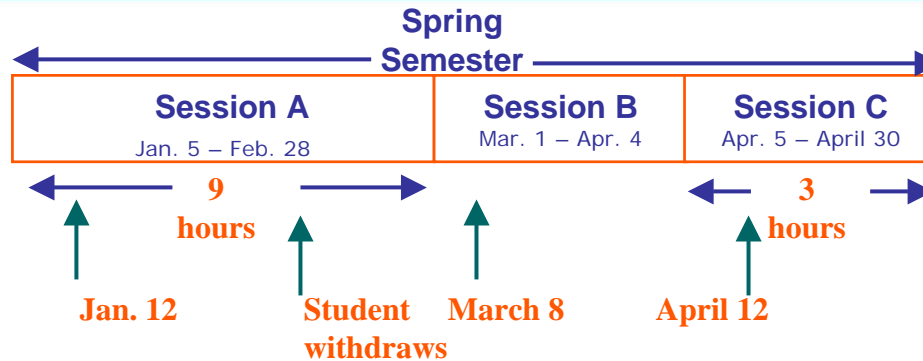
## Scenario Three

- Conditions
  - Student withdraws from 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.





# Case Study #4



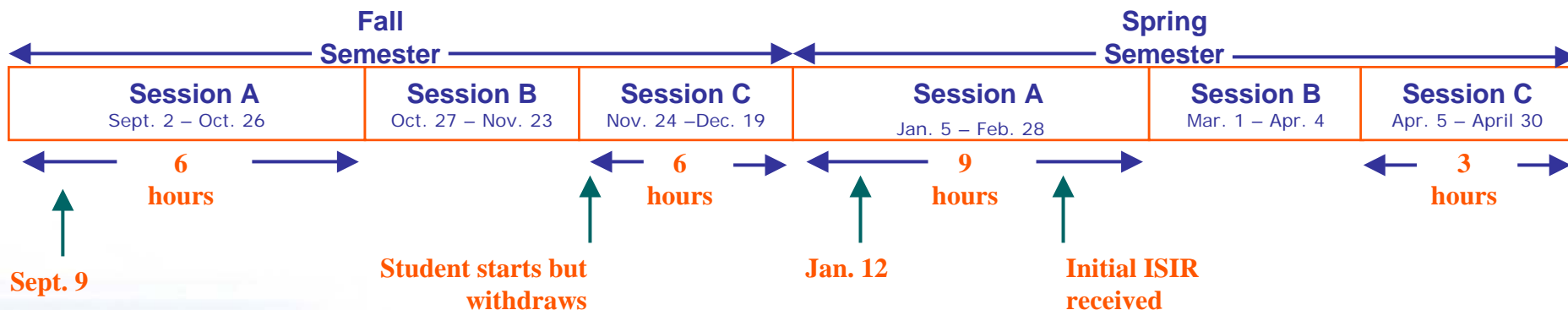
## Scenario Four

- Conditions
  - Student withdraws from 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



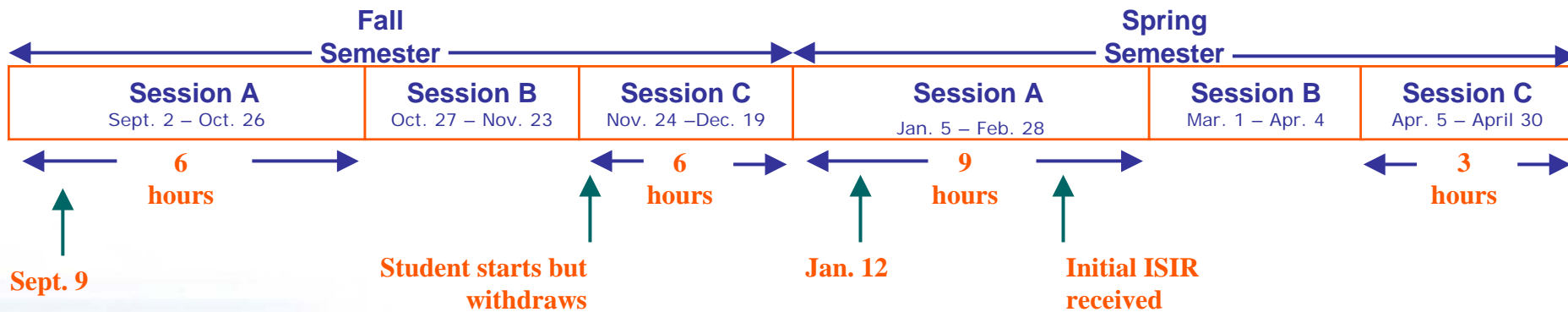
- **Conditions**

- 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**

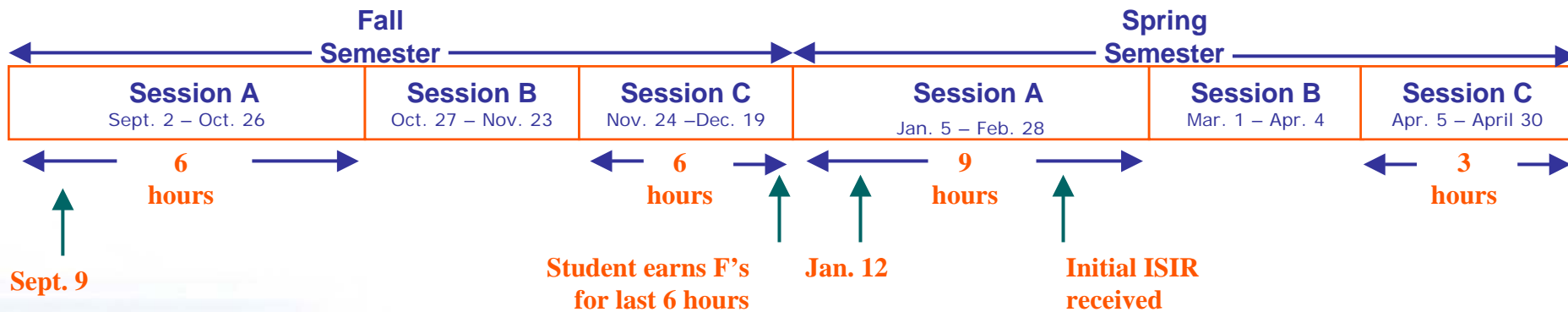
- Student is paid as half-time for fall to pay for coursework completed and full-time for spring upon receipt of the ISIR.
- If the student does not attend spring Session C, award is recalculated as three-quarter-time for the spring term.







# Case Study #6



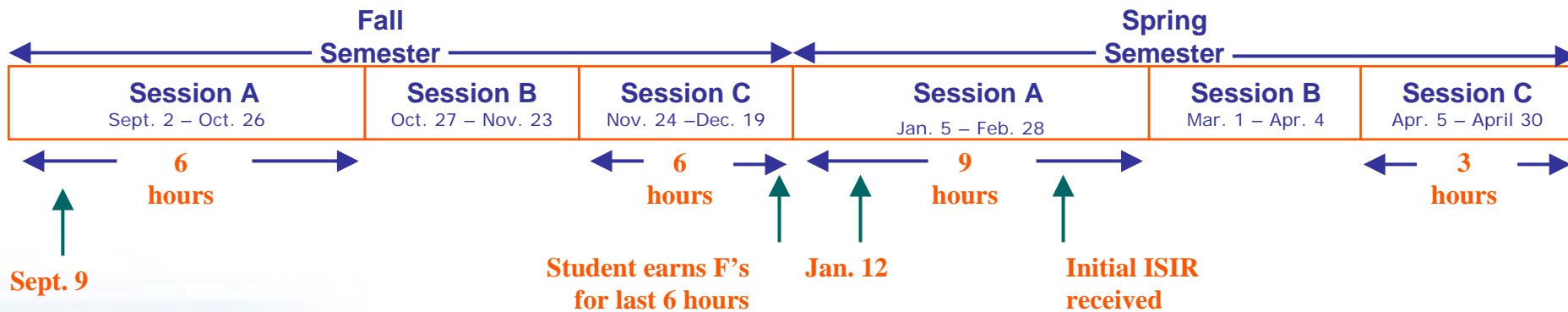
- **Conditions**

- 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



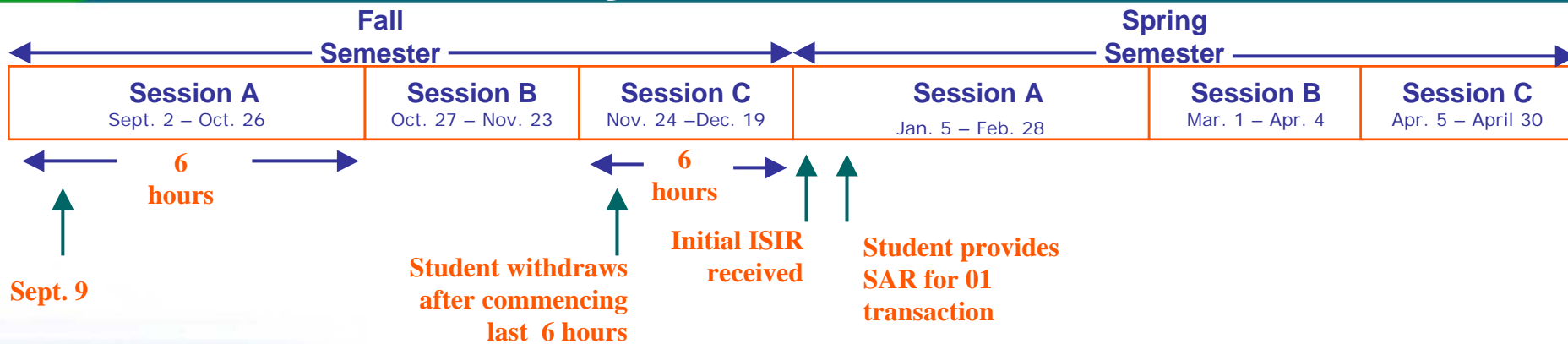
- **Result**

- 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



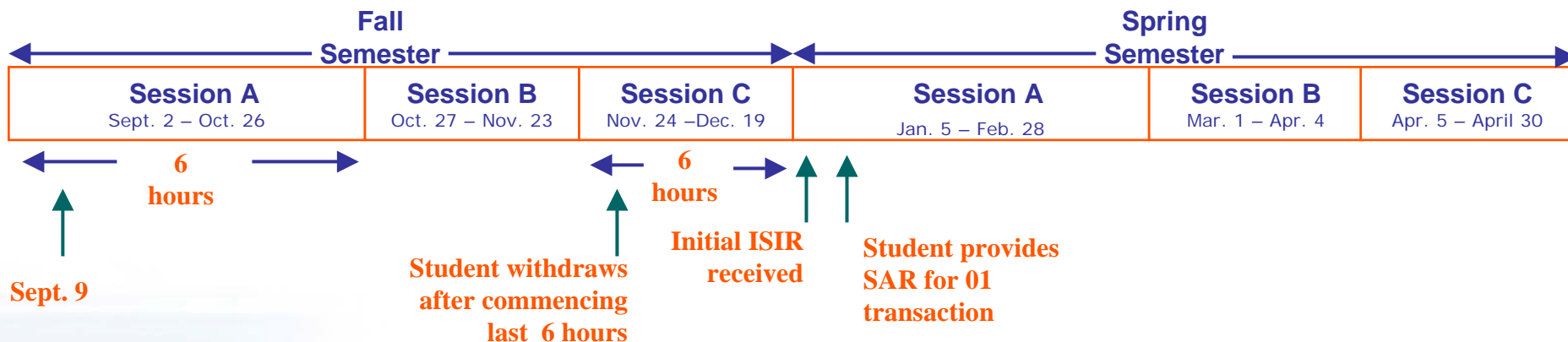
## • Conditions

- 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.





# **Appendix**

## **Recalculation for**

## **Changes in Enrollment**

## **Status:**

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





# R2T4

- 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





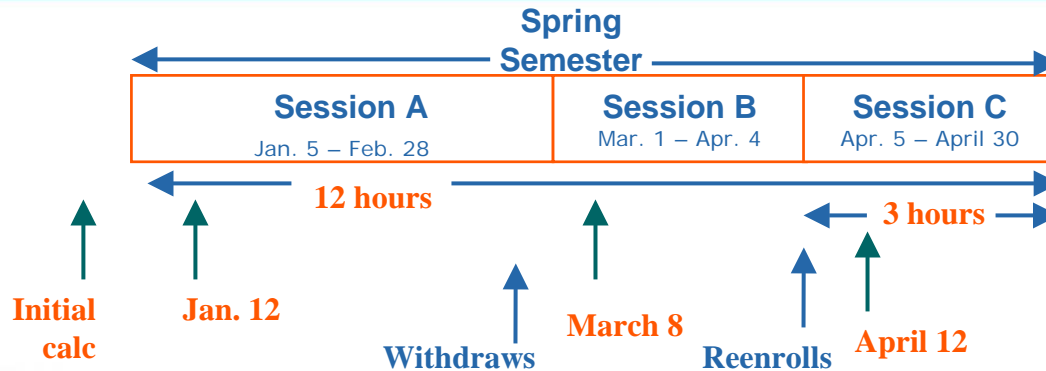
# R2T4

- 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

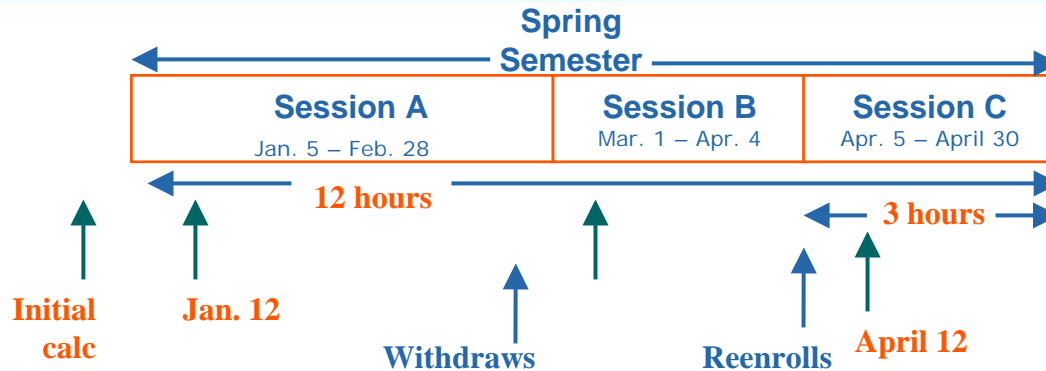
- Has term length and compressed courses
- Uses census date by last class: January 12 for term-length and Session A; March 8 for Session B; and April 12 for Session C
- Enrolls for 12 hours of term length courses
- Receives \$1,000 Pell for semester
- Withdraws completely on February 20 at 40 percent of term; must determine R2T4
- Reenrolls for 3 hours in Session C







# R2T4 Case Study #1

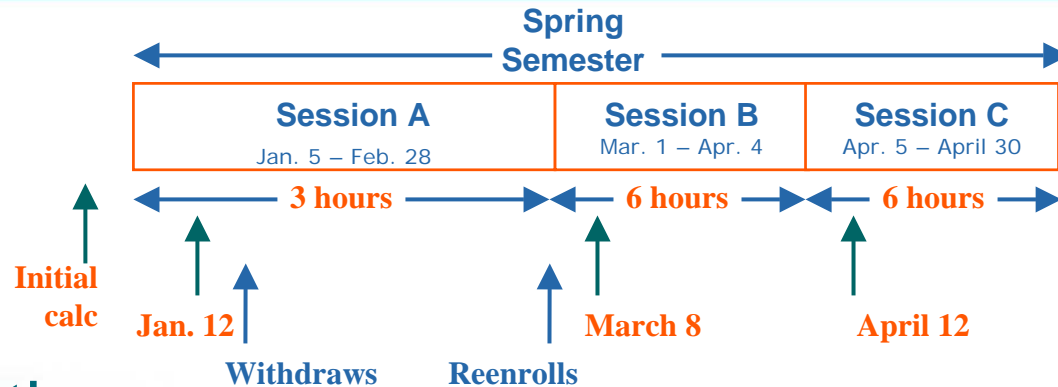


## • Results

- 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.



# R2T4 Case Study #2



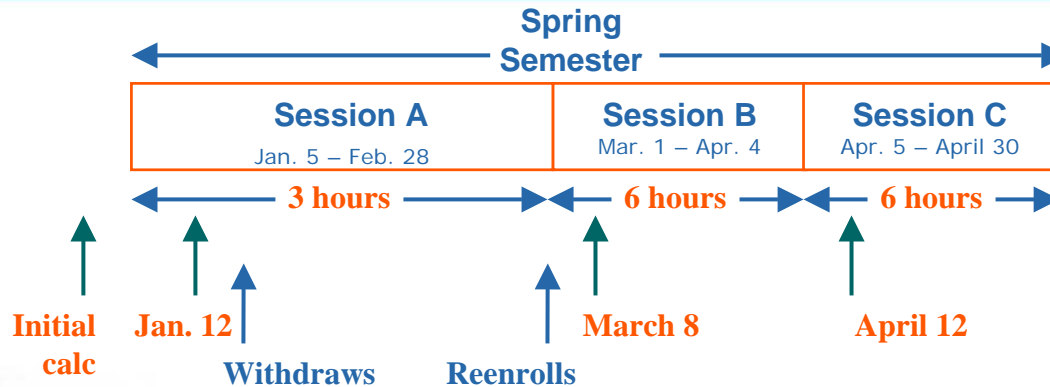
- Conditions

- 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 15; must determine R2T4
- Reenrolls at beginning of Session B for 6 hours in each of Session B and Session C





# R2T4 Case Study #2



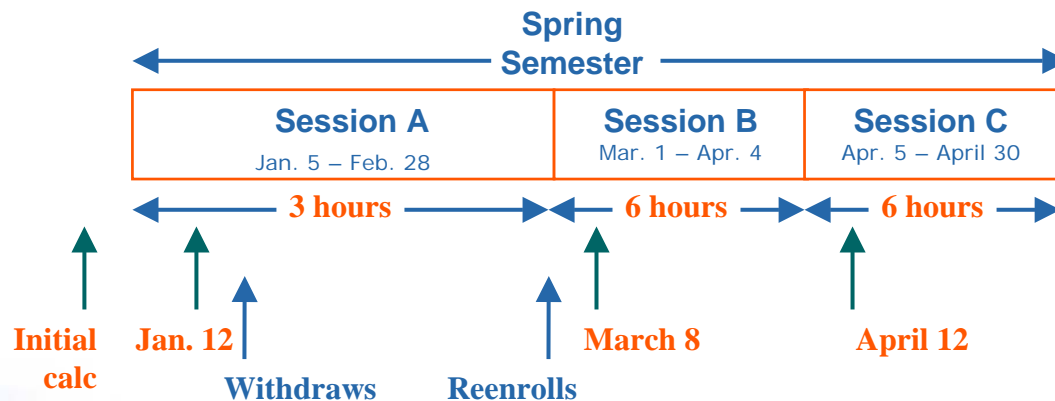
## • Results

- The effective enrollment status at the time of withdrawal is less-than-half-time.
- For purposes of R2T4, the payment period is considered to be only the time the student is expected to attend, session A: 55 days.  $11/55 = 20\%$
- The student earns \$50 under R2T4 and must return \$100 – repay or satisfactory arrangements. (Assumes there are no institutional charges.)





# R2T4 Case Study #2



- Results (cont.)

- 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.





# Appendix

## Recalculation 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.





## Q's and A's

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 at the beginning of the summer term; the student fails to start during summer A; the census date expires; and student is not enrolled. If student enrolls and begins attendance in 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, a full-time student enrolls with 6 hours in





# Q's and A's

## Answer (cont):

A and 6 hours in B. As of the single census date, 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.





# Q's and A's

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.





# Q's and A's

## Answer (cont):

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.

