

**Common Manual Policy Proposal Batch 214 Transmittal****November 27, 2018**

#	Subject	Summary of Change to <i>Common Manual</i>	Type of Update	Effective Date
1327	Withdrawal Dates	<b>9.4 Withdrawal Dates</b> The requirement for a school to report withdrawal dates to the Department was added to the regulations in 2013.	Federal	School reporting of student withdrawal dates on or after July 1, 2014.

Batch 214 (Approved)

# COMMON MANUAL - FEDERAL POLICY PROPOSAL

Date: November 8, 2018

	DRAFT	Comments Due	
	FINAL	Consider at GB meeting	
X	APPROVED	No Changes	11/15/2018

**SUBJECT:** Withdrawal Dates

**AFFECTED SECTIONS:** 9.4 Withdrawal Dates

**POLICY INFORMATION:** 1327/Batch 214

**EFFECTIVE DATE/TRIGGER EVENT:** School reporting of student withdrawal dates on or after July 1, 2014.

**BASIS:**  
78 FR 65768, Nov. 1, 2013; §682.605(b).

**CURRENT POLICY:**  
Current policy states that schools must report withdrawal dates to the lender.

**REVISED POLICY:**  
Revised policy states that schools must report withdrawal dates to the lender and the Department.

**REASON FOR CHANGE:**  
The requirement for a school to report withdrawal dates to the Department was added to the regulations in 2013.

**PROPOSED LANGUAGE - COMMON MANUAL:**  
Revise section 9.4, page 12, column 1, paragraph 3 as follows:

## Documenting and Reporting Withdrawal Dates

The school must maintain documentation of the withdrawal date as of the date the school determines the student withdrew.  
[§668.22(c)(4)]

The school must report the withdrawal date to the lender and the Department. This date determines the beginning of the borrower's grace period or repayment period. A withdrawal date must consist of month, day, and year.  
[§682.605(b) and (c)]

## PROPOSED LANGUAGE - COMMON BULLETIN: Withdrawal Dates

The Manual is being revised to require a school to report student withdrawal dates to both the lender and the Department. Reporting to the Department was added to the regulations in November 2013, per 78 *Federal Register* 65768.

**GUARANTOR COMMENTS:**  
None.

**IMPLICATIONS:**  
*Borrower:* None.

*School:* Schools must report student withdrawal dates to both the lender and the Department.

*Lender/Service:* None.

*Guarantor:* None.

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**To be completed by the Policy Development and Maintenance Contractor (PDMC)**

**POLICY CHANGE PROPOSED BY:**

PDMC

**DATE SUBMITTED TO POLICY DEVELOPMENT AND MAINTENANCE CONTRACTOR:**

September 13, 2018

**DATE SUBMITTED TO CM GOVERNING BOARD FOR APPROVAL:**

November 8, 2018

**PROPOSAL DISTRIBUTED TO:**

CM Guarantor Designees  
Interested Industry Groups and Others  
CM Governing Board Chair

**Comments Received from:**

NASFAA, NCHER, NJHESAA, Trellis.

**Responses to Comments**

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Most commenters support this proposal as written. We thank all commenters for their thorough and thoughtful review.

**COMMENT:** One commenter suggested adding “guarantor” to the list of parties to whom schools must report withdrawal dates.

**Response:** The PDMC disagrees with the suggestion. The policy follows the regulatory requirements outlined in 34 CFR 682.605(b) & (c), neither of which includes reference to the guarantor. Adding it would run counter to established federal policy and imply a separate reporting process which is not required of schools.

**Change:** None.