

Title 5 Excused Withdrawal (EW) and Pass/No Pass (P/NP) Frequently Asked Questions (FAQ)

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General Questions

Can colleges still require documentation of extenuating circumstances?

Verification of the student's circumstance was removed from Title 5 Section 55024 and is no longer required for a student to receive an excused withdrawal. Building on the flexibility that was initiated during the COVID-19 pandemic, the intent of the regulation changes is to support student success by maximizing support for students that are in crisis, and to mitigate withdrawals and strengthen retention efforts. A notable change that demonstrates this intent is that no additional verifiable documentation is required from the student regarding withdrawals. Part of this change is fundamentally unpacking why we had these requirements, what our beliefs about them are, and how we unlearn them so that we can show up more effectively for the student. Each District should have a withdrawal policy and an excused withdrawal procedure that aligns with the intent of these regulation changes.

Is this before a grade is assigned or does it also apply for changes from a grade to an EW?

This is before a grade is assigned. After a grade is assigned follow [title 5 § 55025](#).

Can a petition be required with no documentation?

A petition can be requested with no documentation.

If documentation is not required, is an excused withdrawal allowed if one of the extenuating circumstances is cited?

An excused withdrawal due to extenuating circumstances, such as an accident, illness, or other circumstance beyond the control of the student is permissible. Click [here](#) to review title 5 § 55024, which defines extenuating circumstances as they relate to withdrawal from credit courses.

Can students self-identify an extenuating circumstance in a self-service (For example, a drop-down menu) or is a petition required?

How a student declares extenuating circumstances is determined by local policy (For example, a drop-down menu or petition)

How are mitigation efforts defined?

Mitigation efforts can vary depending on the student's extenuating circumstance and should be detailed in the local community college district policies and administrative procedures with the aid of local general counsel to ensure equitable implementation.

Are colleges required to document mitigation efforts?

Mitigation efforts should be detailed in the local community college district policies and administrative procedures with the aid of local general counsel to ensure equitable implementation.

What documentation is needed for State auditing purposes.

For auditing purposes, colleges can use title 5 § 55024 as documentation.

How is sufficient assistance defined?

Sufficient assistance is determined by the local community college district policies and administrative procedures with the aid of local general counsel to ensure equitable implementation.

If a student does not drop a class and receives a grade, can they petition for an excused withdrawal? *For example, a student stops attending class due to an extenuating circumstance but did not withdraw from the course and received a substandard grade. Is the student able to request and EW EW due to extenuating circumstances?*

Petition procedures should be addressed and determined by the local community college district policies and administrative procedures with the aid of local general counsel to ensure equitable implementation. After a grade is assigned follow [title 5 § 55025](#).

May a student apply for an excused withdrawal if they earned a standard grade?

For example, a student experienced an extenuating circumstance that prevented them from earning a grade higher than "C." Are they able to receive an excused withdrawal due to extenuating circumstances?

Petition procedures should be addressed and determined by the local community college district policies and administrative procedures with the aid of local general counsel.

How long does a student have to use an 'EW'?

The regulatory language allows colleges the opportunity to determine in their local community college district policies **the appropriate length of time within the term** that most support students. To have consistency colleges are encouraged to review the new language added to the [title 5 § 55022](#), regarding the timeframe within the **term (last day of instruction)**.

So technically can be up to the last day of classes? Like the P/NP?

Correct, it can be up to the last day of instruction. The last day of instruction will be determined by the length of the course.

Regarding Claiming Apportionment

Can districts now claim apportionment for grades of “EW”?

The option to grant an excused withdrawal (EW) was first established in regulation in 2018. Prior to the regulatory updates described below, if an EW was granted because of ‘extenuating circumstances,’ a district was limited to claiming apportionment, or contact hours, to four total enrollment attempts. Extenuating circumstances are defined in title 5 section 55045 as verified cases of accidents, illness, or other circumstances beyond the control of the student. However, there was no limit on the number of times that a district could claim apportionment, or contact hours, for an excused withdrawal due to extraordinary conditions such as a fire, flood, earthquake, epidemic, or other condition as defined in title 5 § 58146.

Recent revisions to title 5 §§ 55024 and 58509, now allow students to receive an EW for both extenuating circumstances or extraordinary conditions and remove the limit on the number of times a district may claim apportionment for an excused withdrawal due to extenuating circumstances. Excused withdrawals are not counted toward progress probation and dismissal calculations or toward the number of permitted student withdrawals.

Regarding Financial Aid (FA) and Satisfactory Academic Progress (SAP)

EW grades once counted against student SAP calculations, and then did not for the period of COVID given a regulation update. At our college, all COVID related EWs received the regular EW grade. Now that FA needs to include EW grades in SAP again (beginning Spring 2023) we need a way to separate out the COVID EW from the regular EW or they will count against their overall pace of completion. We are proposing to create a new COVID grade "CW" highlighting the students who received an EW (new grade CW).

Please refer to the regulations regarding the system’s grading policies. ([Grading and Academic symbols](#)). Local grading policies will be set by local community college district policies and per title 5 § [55020](#) and will need to be consistent with the full suite of regulations noted in the first link. At this time, the grading symbol proposed is not consistent with title 5 § [55023](#). Colleges are encouraged to work with your IT to create a method of coding that will allow you to identify EWs assigned during COVID.

How do we treat COVID-19 related withdrawals in our SAP calculation? (www.nasfaa.org)

COVID-19 related withdrawals are attempted credit hours or clock hours the student was unable to complete, just like other withdrawals. Due to COVID-19, the difference in treatment relates only to the quantitative (pace) component of Title IV satisfactory academic progress (SAP). The same guidance applies to individual courses the student dropped (withdrew from) due to COVID-19.

Quantitative/Pace Component: Under Section 3509 of the [CARES Act](#) and the [May 15, 2020 Electronic Announcement](#), for the quantitative (pace) evaluation of SAP, schools are allowed (not required) to exclude any attempted credits a student was unable to complete as a result of the COVID-19 qualifying emergency. This includes all COVID-19 related withdrawals (or drops) during the payment period or period of enrollment for which the SAP evaluation is taking place. This flexibility applies for SAP evaluations made through the end of the payment period that includes the last date of the national emergency. Since the national emergency will end on May 11, 2023, the flexibility applies through the end of the payment period that contains May 11 at the school. The COVID-related course withdrawals would continue to be excluded cumulatively in future SAP evaluations even after May 11, 2023.

Qualitative/GPA Component: The answer is different, and the above flexibility does not apply to the qualitative measure of SAP (usually a grade point average--GPA). Lacking guidance from ED to the contrary, the Title IV regulations remain in place for the qualitative measurement. Under [34 CFR 668.34\(a\)\(6\)](#), schools have long had the ability to determine how to treat withdrawals in the qualitative evaluation of SAP, with one exception. Under [668.34\(a\)\(1\)](#), calculation of a student's GPA for Title IV SAP purposes must be at least as strict as the calculation of the GPA for academic purposes at the institution. Otherwise, it is up to the institution to establish a policy on how it treats withdrawal grades. In other words, the school can choose to ignore "W" grades or assign other non-letter grades that cause the course to be excluded from the GPA calculation. The school can also assign letter grades or treat them as "0" grade points in the SAP calculation. See Volume 1, Chapter 1 of the *FSA Handbook*.

Regarding Pass/No Pass

What is the definition of last day of instruction?

The language of 'no later than 30% the term' was removed and replaced with the language 'Courses in which wherein each student may elect until the last day of instruction, as established and published by the districts.' The update provides the students the ability of a longer length of time within the term to use an 'EW.' As detailed in the regulations colleges' will define what the last day of instructions, in their local policy. The last day of instruction will change depending on the course length in the term. Other areas around the use of 'Pass/No Pass' not covered in the regulations should be addressed and determined in local policies, with the focus on addressing support for students.

Clarification, whether it is last day of instruction of the college term or last day of instruction for that particular course.

Would be the last day of instructions for a particular course.