

**Keeping It Standard**  
*How Flexibilities in Standard-Term Programs Can Accommodate Academic Innovation*

Zack Goodwin, US Department of Education  
 MASFAP Conference, Lake of the Ozarks, MO  
 November 2018




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**Agenda**

- Need for innovation
- Flexibilities of standard-term programs
- Nonstandard-term and non-term academic calendars
- Other considerations




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**Why innovate?**

- Changing student demographics
- Shrinking applicant pools
- Financial pressures
- Career-oriented initiatives
- New or under-utilized technologies




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**Innovation Challenges**

- Student information system complexity
- Maintaining disbursement schedules
- Documenting student attendance and withdrawals
- Consumer information and communications
- Compliance concerns

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**What is a standard term?**

Term:  
*A discrete period of time during which all courses are scheduled to begin and end*

Standard term:  
*A term of 15 to 17 weeks of instructional time (semester credits)*  
 or  
*A term of 10 to 12 weeks of instructional time (quarter credits)*

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**What is *not* a standard term?**

- Terms shorter or longer in instructional weeks than the standard definition
- Standard-length terms where a different type of academic credit is offered
  - E.g., quarter terms with semester credit
- Standard-length terms where full-time undergraduate enrollment status is defined as *fewer* than 12 credits
- Terms that overlap other terms
- Non-term credit-hour or clock-hour programs offered in modules or term-like formats

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## Flexibilities of Standard Terms

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## Modules

*Module:*  
A course or courses in a program that do not span the entire length of the term

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## Modules: Benefits

- Several short courses can be combined to form a standard term, with or without full-term courses
- Several *overlapping* courses can be combined to form a standard term
- Schools with multiple starts may not need to track separate cohorts
- Students may be better able to balance school and other responsibilities
- Aid disbursements tied to modules can help to support responsible borrowing

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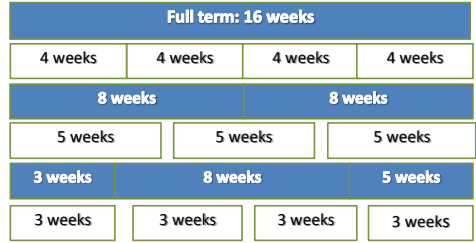
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**Modules: Benefits**

*Flexibility in scheduling courses*



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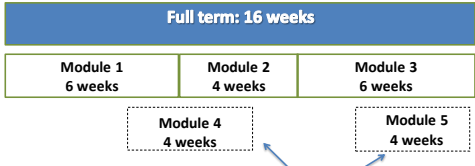
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**Modules: Benefits**

*Flexibility in scheduling courses*



*In a standard-term program, modules may overlap other modules, but terms may not overlap other terms*

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**Modules: Considerations**

- Increased enrollment options
- More complex policies around institutional charges and refunds
- Complex Pell Grant recalculations
- Challenges monitoring withdrawals and applying R2T4 rules
- Cost of attendance and EFC adjustments to reflect only periods a student is attending
- Disbursement timing to reflect actual start dates

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### Two-week Tolerance

*In a standard-term program, courses may be scheduled up to a total of two weeks outside of the regular term dates without having to treat the term as nonstandard.*

*Standard terms of up to two weeks' difference in length from each other are not treated as nonstandard.*

*Substantially equal = two weeks*



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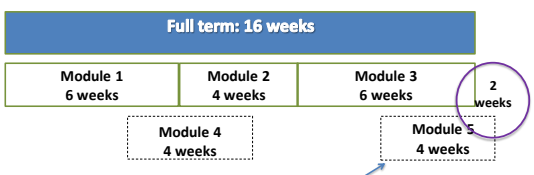
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### Two-Week Tolerance

*Flexibility in scheduling courses*



In a standard-term program, courses may extend up to two weeks outside of the term *in total*



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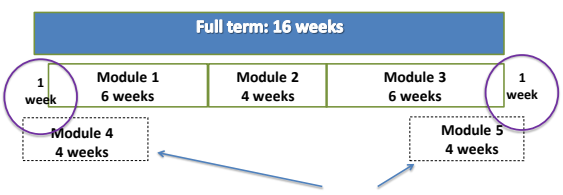
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### Two-Week Tolerance

*Flexibility in scheduling courses*



In a standard-term program, courses may extend up to two weeks outside of the term *in total*



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### Two-Week Tolerance

1 week      1 week      1 week

*Does this calendar reflect a standard-term program?* **Yes!**

- Terms are of standard length (15 to 17 weeks)
- In neither term do classes extend outside the regular term dates by more than two weeks
- Terms, including extended courses, do not overlap

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### Two-Week Tolerance

1 week      1 week      1 week

*Does this calendar reflect a standard-term program?* **No!**

- An extended spring term course overlaps the fall term, so the program would be considered non-term

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### Summer Terms

- Summer terms may be treated as standard regardless of length, *provided full-time status for undergraduates is defined as at least 12 credits in every term*
  - Full-time status may vary in summer for graduate students
- Many calendar options for multiple summer sessions
  - Combine sessions into a single term (modules)
  - Treat each session as a stand-alone term
  - Can be assigned to the same or different academic years depending on whether sessions are crossover periods

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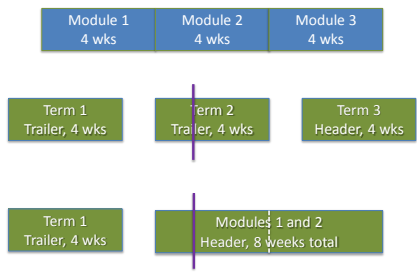
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Summer Terms




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Summer Terms: Considerations

*If multiple summer sessions are offered, these must be combined into one term in order to award Direct Loans using a Borrower-Based Academic Year (BBAY1). Otherwise a Scheduled Academic Year (SAY) must be utilized.*

- However, BBAYs containing a summer term are not required to be at least 30 weeks in length

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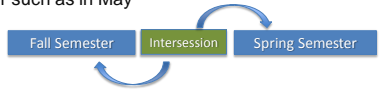
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Intersessions

- Courses offered in a term that would otherwise be considered nonstandard may be 'attached' to a standard term
  - Add the intersession to one standard term
  - Treat the entire combined term as one payment period
  - Can be a January session, or sessions at other times of year such as in May




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**Interessions**

- Adding an interession, provided there is no overlap with another term, keeps the terms standard



- This does, however, create a term with *modules*
  - Both the Interession and 'attached' terms are modules
  - The interession courses may overlap into the 'attached' term and vice versa

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**Interessions: Considerations**

- Enrollment status reflects enrollment in the Interession and attached term *combined*
- Cost of Attendance and EFC should reflect only periods the student is attending
- Disbursements may be made up to 10 days prior to the student's first day of classes

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**Other Standard Term Advantages**

- May use Pell Grant Formula 1
- Consistency in disbursement rules across programs
- Flexibility with Scheduled and Borrower Based Academic Years (SAYs and BBAYs) for Direct Loans
  - May use SAYs and BBAYs, or alternate between them
  - May originate single-term loans

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## Other Standard Term Advantages

Sometimes in programs where clinical work is required (e.g., in medical fields or teaching), clinical periods do not coincide with a school's standard-term calendar. If the following conditions are met, a program need not be considered nonstandard-term or non-term:

- All students must participate in the clinical experience, and its completion is required for graduates to apply for licensure
- The institution has little or no control over the length or start and end dates of the clinical periods
- Credit hours must be associated with the term in which most of the training occurs, even if start and end dates are different or there is overlap with another term

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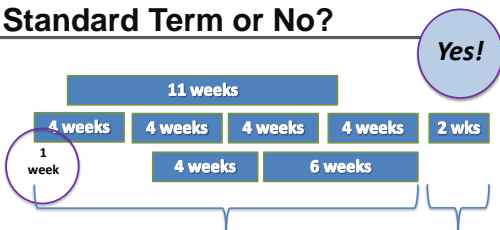
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## Standard Term or No?



- Modules can be combined to form a standard term of 16 or 17 weeks
  - This assumes there are few to no break times between modules
- The final two-week course can be considered an intersession, and can be attached to the term
  - This assumes that no courses overlap another term

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## Standard-Term Calendar or No?



- The two- and three-week modules can be treated as intersessions, and can be attached to the adjacent terms
  - No courses overlap another term
- Since the first and second terms can be considered standard, the third term in the year may be treated as standard even though it is of nonstandard length

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## Other Academic Calendars

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## Nonstandard Term Considerations

*Keeping nonstandard terms substantially equal and at least nine weeks in length (SE9W), allows for most of the flexibilities of standard terms.*

- Consistency in disbursement rules across programs
- Flexibility with SAYs and BBAYs
- Single-term loans

*Pell Grant Formula 3 must be used*

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## Non-term Considerations

- In non-term credit-hour and clock-hour programs, payment periods are based on the completion of hours and weeks
  - This has the greatest impact on administrative processes and timing of aid disbursements when students attend part-time or otherwise progress at an individual pace
  - However, when all or most students are full-time, disbursements can often remain scheduled in a way that mirrors a standard-term program
    - All students are completing hours and weeks at the same time

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### Other Considerations

- *How will aid be provided in a way that ensures students have access to the resources they need?*
- *Instruction* defines how many weeks are included in a term
  - Flipped classes, independent study
- Changes being made to academic programs may require updating the E-App
  - Accreditor and/or state approval may also be needed

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### Other Considerations

- Effective July 1, 2016, even when a program must be offered in clock hours for state licensure purposes, it may be offered in credit hours for Title IV
  - May be subject to the clock-to-credit conversion

[IFAP > Cash Management Information Page](#)

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## Resources

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## References

### FSA Handbook

- Volume 2: Program eligibility
- Volume 3: Calendars, payment and loan periods, modules
- Volume 4: Disbursement rules
- Volume 5: Withdrawals and R2T4

### Program Integrity Q & A Website

- (Return of Title IV funds / Programs Offered in Modules)  
<http://www2.ed.gov/policy/highered/reg/hearulemaking2009/return.html#module>

- *Dear Colleague Letter GEN-11-14: July 20, 2011*




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## Thank you!

Zack Goodwin  
[zachary.goodwin@ed.gov](mailto:zachary.goodwin@ed.gov)  
 312.730.1689




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## We Appreciate Your Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation:

<https://www.surveymonkey.com/r/ZacharyGoodwin>

This evaluation tool provides a means to inform us of areas for improvement, and to support an effective process for listening to our customers.

Additional feedback about training can be directed to Mark Gerhard at [Mark.Gerhard@ed.gov](mailto:Mark.Gerhard@ed.gov).




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**ED Contacts: Kansas City**

Training Officer: *David Bartlett*  
*david.bartlett@ed.gov*  
*816.268.0434*

Institutional Improvement Specialist:  
*Jim Wyant*  
*jim.wyant@ed.gov*  
*816.268.0431*

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**ED Contacts**



Reach FSA  
855.FSA.4FAA.....One number to reach 7 contact centers!

- eZ-Audit      School Eligibility Service Group
- COD            CPS/SAIG
- NSLDS        Nelnet Total & Permanent Disability Team
- G5

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