

# *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  
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## **Agenda**

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- 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

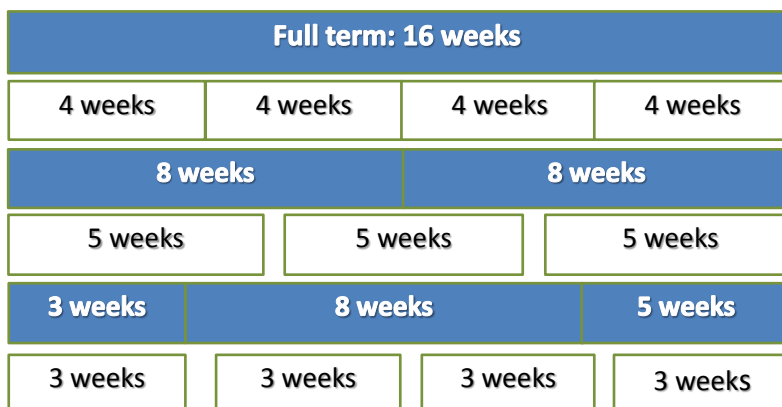
- Several short courses can be combined to form a standard term, with or without full-term courses
- Several *overlapping* courses can be combined to form a standard term
- Schools with multiple starts may not need to track separate cohorts
- Students may be better able to balance school and other responsibilities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

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## Modules: Benefits

### *Flexibility in scheduling courses*



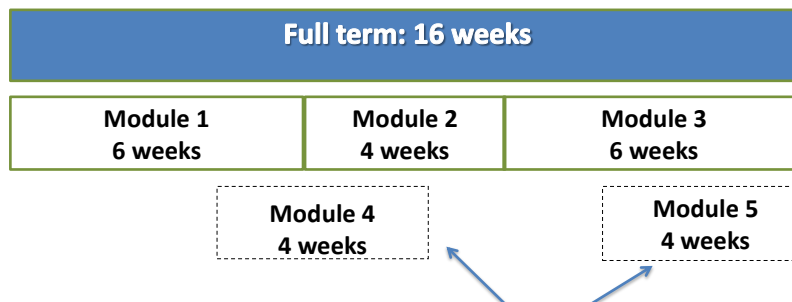
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## Modules: Benefits

### *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.*

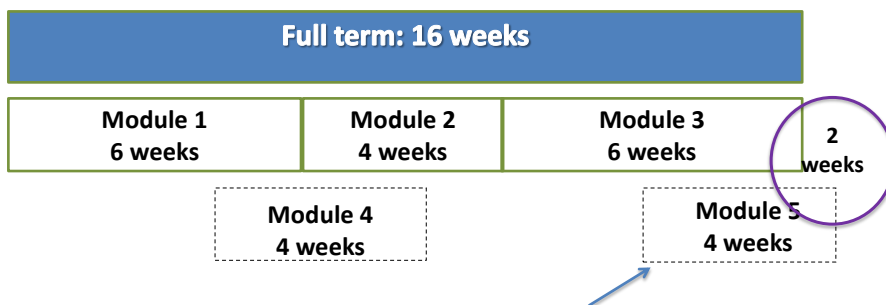
*Substantially equal = two weeks*

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## Two-Week Tolerance

*Flexibility in scheduling courses*



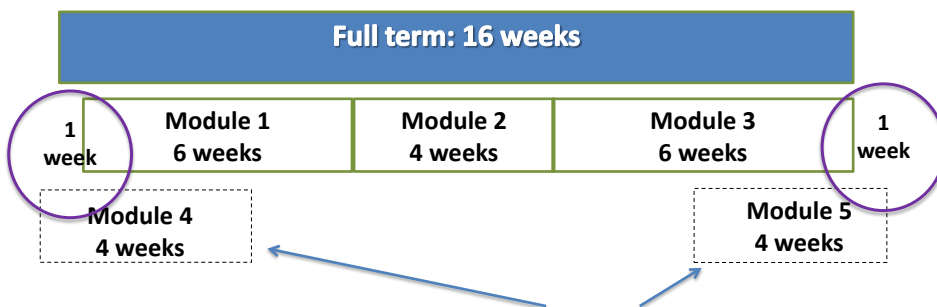
In a standard-term program, courses may extend up to two weeks outside of the term *in total*

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## Two-Week Tolerance

*Flexibility in scheduling courses*

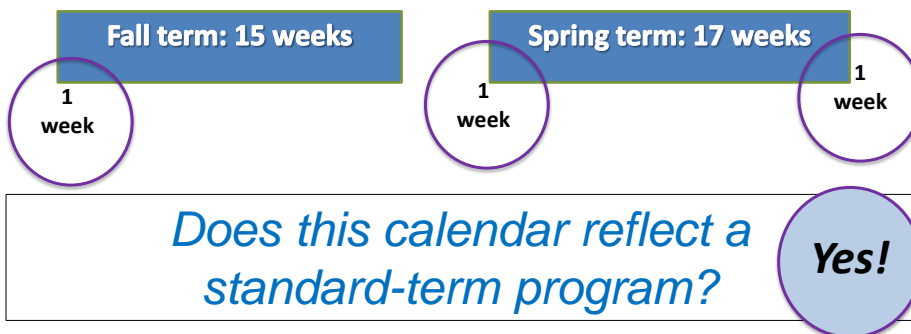


In a standard-term program, courses may extend up to two weeks outside of the term *in total*

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## Two-Week Tolerance



- 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

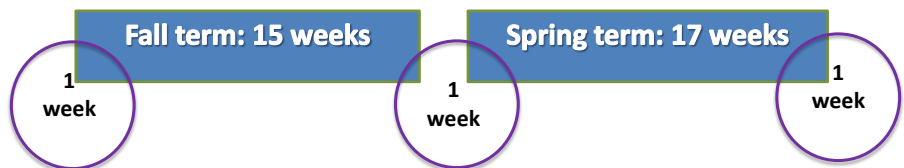
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## Two-Week Tolerance



*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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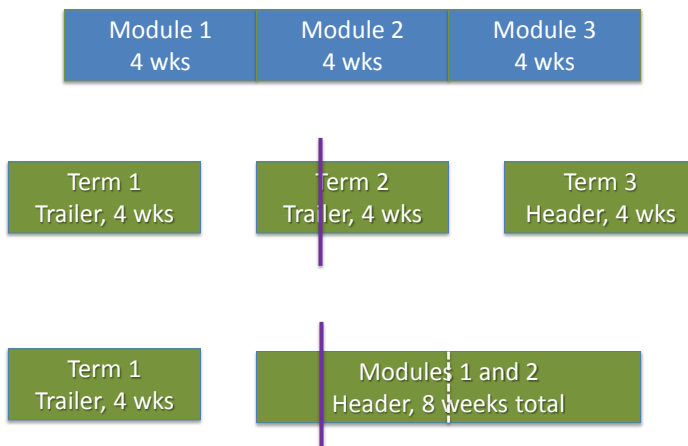
## Summer Terms

- 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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## 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.*

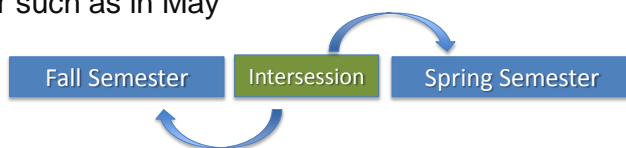
- However, BBAYs containing a summer term are not required to be at least 30 weeks in length

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## 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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## Intersessions

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



- This does, however, create a term with *modules*
  - Both the Intersession and ‘attached’ terms are modules
  - The intersession courses may overlap into the ‘attached’ term and vice versa

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## Intersessions: Considerations

- Enrollment status reflects enrollment in the Intersession 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

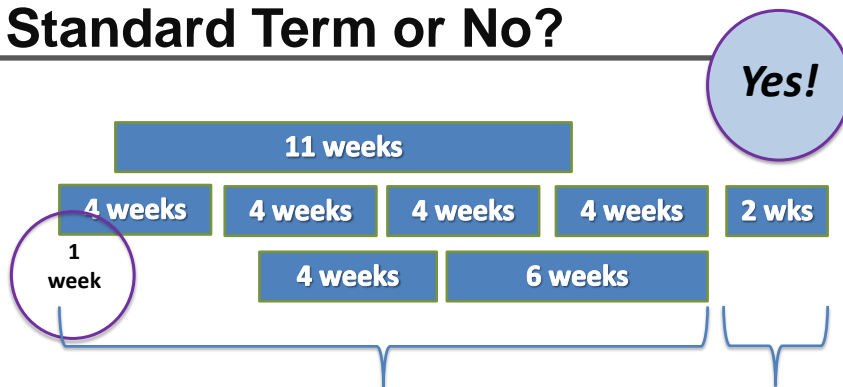
*Sometimes in programs where clinical work is required (e.g., in medical fields or teaching), clinical periods do not coincide with a school's standard-term calendar. If the following conditions are met, a program need not be considered nonstandard-term or non-term:*

- 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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## Standard Term or No?



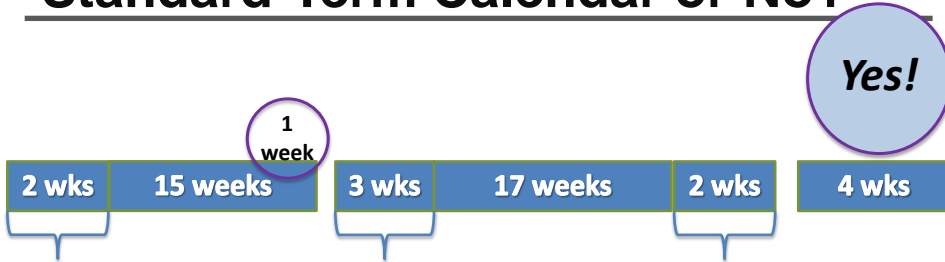
- *Modules can be combined to form a standard term of 16 or 17 weeks*
  - *This assumes there are few to no break times between modules*
- *The final two-week course can be considered an intersession, and can be attached to the term*
  - *This assumes that no courses overlap another term*

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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/hearulemaking/2009/return.html#module>
- [Dear Colleague Letter GEN-11-14: July 20, 2011](#)

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# Thank you!

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<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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*Jim Wyant*  
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*816.268.0431*

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## ED Contacts



### [Reach FSA](#)

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

<i>eZ-Audit</i>	<i>School Eligibility Service Group</i>
<i>COD</i>	<i>CPS/SAIG</i>
<i>NSLDS</i>	<i>Nelnet Total &amp; Permanent Disability Team</i>
<i>G5</i>	

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