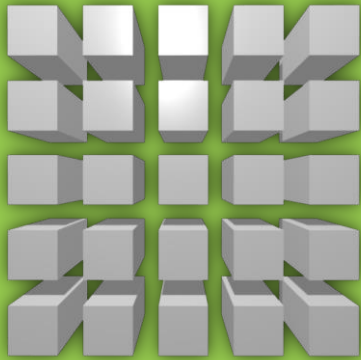


Modules and TIV – Advanced Concepts



Modules and Title IV: Advanced Concepts

David Bartnicki | April 23-25, 2018
 U.S. Department of Education
 TASFAA Annual Conference

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Modules and Standard Term Calendars

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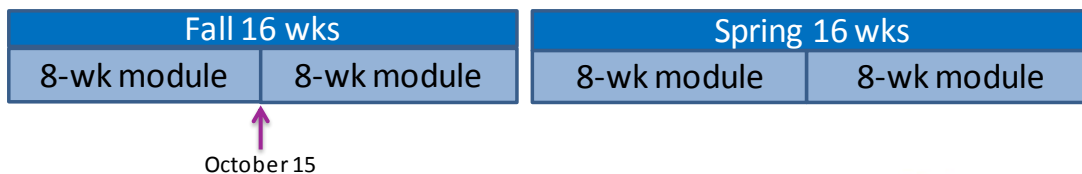
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Modules and TIV – Advanced Concepts

Standard Term Calendar Used In Examples

- Standard term, semester-based program
- Academic year is 32 weeks, consisting of two 16 week semesters
- Semester contains two 8 week modules
- Classes may last the entire term or occur within modules
- Students may enroll in any combination of classes
- Full-time enrollment is 12 semester hours



3

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Disbursement Considerations

- Payment period is the entire standard term (semester)
 - Regardless of student's enrollment in classes over the entire semester, modules, or both
- Payment of Title IV aid (except Federal Work-Study) is calculated on a payment period basis, not by individual module
 - However, it is allowable to break up the payment for the payment period into multiple disbursements
- Earliest disbursement date is 10 days before the first day of classes for a student within a payment period

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Federal Pell Grant Program Considerations

- Federal Pell Grant recalculation policy may affect enrollment flexibilities
 - Acme School of Culinary Arts uses Example 1 calendar and has *one Pell Grant recalculation date* of September 21, which falls before the start of Module 2
 - As of Pell Grant recalculation date, Janet is enrolled for nine credits
 - On September 23, two days after the Pell Grant recalculation date, Janet adds three credits from Module 2; Pell Grant enrollment status must not be changed to add the additional credits due to school's policy

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Example 1 Pell Grant Considerations

- Student must begin every class used to determine enrollment status
 - Cindy at Acme (using Example 1 calendar and *single Pell recalculation date*) enrolls for six credits in Module 1 and six credits in Module 2
 - As of the September 21 Pell Grant recalculation date, she is still enrolled for all 12 credits (enrollment status = full time) with a disbursement made based on that enrollment status
 - However, on September 25, she drops the six credits in Module 2
 - Although the Pell Grant recalculation date is past, her enrollment status must be adjusted to ½ time and her award recalculated because she never attended any class(es) in Module 2
 - This is a mandatory Pell Grant Recalculation

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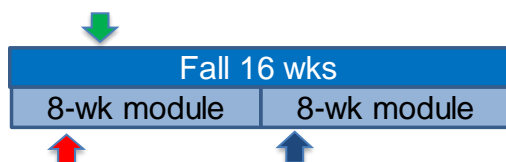
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Modules and TIV – Advanced Concepts

Example 2 Pell Grant Considerations

- Pell Grant recalculation policy may affect enrollment flexibilities
 - Borax School of Mining uses our example calendar and uses *multiple Pell Grant recalculation dates* and must recalculate Pell Grants up to the Pell Grant recalculation date for the last class in which the student enrolls
 - September 7 for Module 1 (Red arrow)
 - September 21 for the full semester (Green arrow)
 - November 1 for Module 2 (Blue arrow)



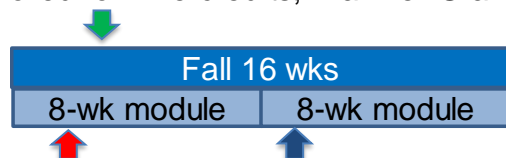
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Example 2 Pell Grant Considerations

- Borax School of Mining PRDs
 - September 7 for Module 1 (Red arrow)
 - September 21 for the full semester (Green arrow)
 - November 1 for Module 2 (Blue arrow)
- As of September 21 Pell Grant recalculation date, student enrolled for, and began 12 credits from full semester
- On October 3, he drops six credits
- On October 15, he adds three credits from Module 2 (and attends Mod 2)
- As of the November 1 Pell Grant recalculation date for Module 2, he is enrolled for nine credits; final Pell Grant enrollment status is $\frac{3}{4}$ time



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Modules and TIV – Advanced Concepts

William D. Ford Federal Direct Loan Considerations

- Loan period
 - Shortest period for which a loan may be originated is the term, not a module
 - Student enrolls for Spring semester only, taking six credits all from Module 1; loan period is the entire semester, not Module 1
 - Loan eligibility for a term-only loan is

COA – EFC (if subsidized) – EFA
up to the applicable annual loan limit,
not one half or some other portion of the annual loan limit

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Direct Loan Considerations

- Enrollment status
 - Census date or PRD is not applicable to Direct Loan, only Pell Grant/TEACH Grant/Iraq-Afghanistan Service Grant
 - Recalculations not required
 - Enrollment status is checked at the time of disbursement
 - Student enrolls for six credits (three in Module 1 and three in Module 2); student begins attendance in Module 1; loan is disbursed (enrollment status ½ time); student never begins attendance in Module 2
 - Loan disbursement is okay; no adjustment or recovery of funds
 - Possible Return of Title IV funds (R2T4) issues associated with student not taking all modules she was scheduled to take

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Modules and TIV – Advanced Concepts

Cost of Attendance (COA) Changes



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COA Review

- COA for Pell Grant and Iraq & Afghanistan Service Grant is based on full-year costs for a full-time student
- COA for Campus-Based, TEACH Grant, and DL/DL PLUS Loan is based on student's actual cost for the period for which the aid is intended
 - Must exclude costs for periods student will not attend
 - Enrollment status is a factor
- COA for less than half-time enrollment
 - Only tuition and fees, books and supplies, transportation, room and board for limited duration*, and dependent care are included
 - Misc. and personal expenses may not be included

* Up to three semesters (or equivalent) with no more than two semesters being consecutive

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Modules and TIV – Advanced Concepts

COA Changes – Pell Grant

- No requirement to recalculate Pell award for COA changes during an award year
 - Example – Student accepted into on-campus housing after fall term and budget for on-campus housing is lower
 - If you chose to recalculate for changes in cost, that recalculation policy must be consistently applied
- If Pell is recalculated because of an enrollment status change, changes in cost must be taken into account
 - Only an issue if student drops to less-than-half-time since Pell COA is always full-year/full-time

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COA Changes – Campus-Based

- COA for the Campus-Based programs must reflect changes to costs, and exclude costs for periods a student will not attend
 - School must determine if need for CB aid still exists (no overaward) once cost changes are factored in
 - Example – Student enrolls for Modules 1, 2 and 3 of the fall semester but drops all classes from Module 3
 - COA must be adjusted to exclude costs from Module 3
- Campus-Based award amounts are not dependent on enrollment status, but are made in consideration actual costs

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Modules and TIV – Advanced Concepts

COA Changes – Direct Loan

- Originating a Direct Loan
 - COA based on actual costs, excluding costs for periods won't attend
 - *School may not originate based on projected enrollment status*
 - Must have some documented indication of enrollment in order to determine costs
 - Documented enrollment status for initial term may be projected over the loan period
- No requirement to recalculate for any reason after loan is originated
 - Example – Loan originated based on costs for enrollment in Modules 1, 2 and 3 of fall semester but the student drops all classes from Module 3
 - DL award does not have to be recalculated

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COA and EFC Example 3 Calendar

- Standard term, semester-based program
 - Academic year is 32 weeks, consisting of two 16 week semesters
- Semester contains two 8 week modules
- Classes may last the entire term or occur within modules
 - Students may enroll in any combination of classes
- Full-time enrollment is 12 semester hours



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Modules and TIV – Advanced Concepts

Example 3 COA and EFC - Adrianna

- Adrianna is going to attend Fall and Spring Semesters
- BUT, in Fall she is ½ time and she is only attending classes in Module 1
 - What is Adrianna's loan period?
 - What is her COA and EFC?



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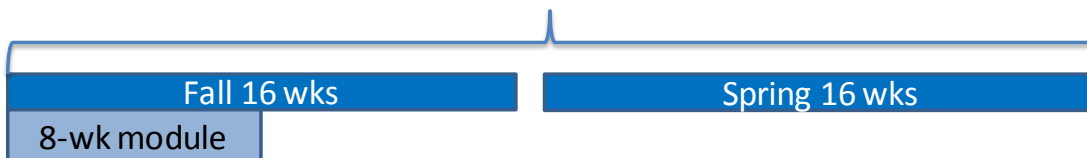
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Example 3 COA and EFC - Adrianna

What is Adrianna's loan period?

Her loan period is from the first day of Fall to the last day of Spring (assuming Summer is not a factor)



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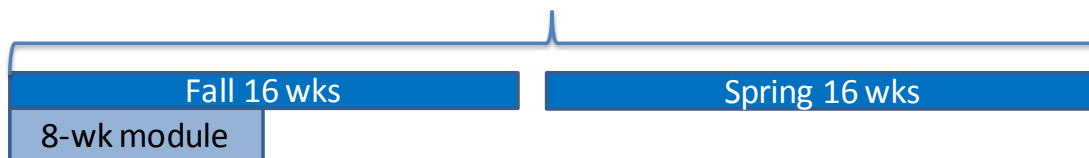
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Modules and TIV – Advanced Concepts

Example 3 COA and EFC - Adrianna

What is her COA?

- COA will reflect her costs for entire loan period minus any time during an academic term that we know she will not be attending
- So, Adrianna's costs will be from the beginning of Fall to the end of Spring minus the costs attributable to Fall Module 2, when she is not attending



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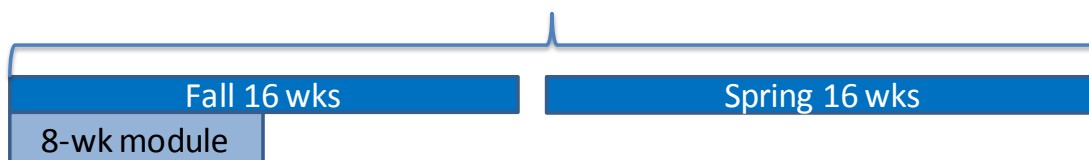
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Example 3 COA and EFC - Adrianna

What is her COA?

- What costs are used for Spring when originating the DL at the beginning of Fall?
- We know Adrianna is a $\frac{1}{2}$ time student for Fall so we can use the costs associated with that enrollment status for both academic terms



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Example 3 COA and EFC - Adrianna

- Adrianna is a $\frac{1}{2}$ time student for Fall so we can use the costs associated with that enrollment status for both academic terms
 - The school can change the Spring COA, and loan amount, if applicable, if enrollment status changes when the Spring semester starts
 - School policy
 - PJ
 - Not at all
- *School must not assume an enrollment status for Spring with no reason*



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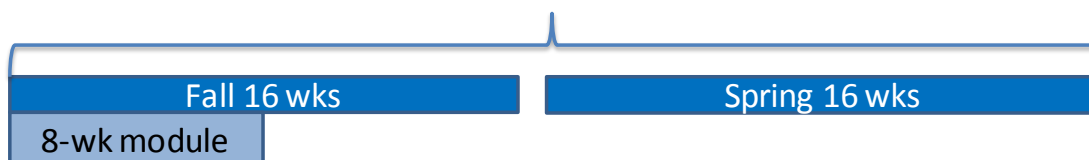
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Example 3 COA and EFC - Adrianna

What is her EFC?

- School has latitude
 - EFC for number of months from beginning of Fall to end of Spring
 - EFC from Fall to Spring but back out break between semesters
 - EFC from Fall to Spring but back out the Fall – Module 2



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Standard Term - Quarters

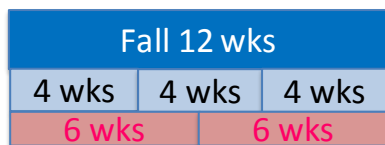
- Standard term, quarter-based program
 - Academic year is 36 weeks, consisting of three 12 week quarters
- Quarter contains three 4 week modules and two 6 week modules
- Classes may last the entire term or occur within modules
 - Students may enroll in any combination of classes
- Full-time enrollment is 12 quarter hours per term



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Standard Term – Quarters – Disbursements



Example 4

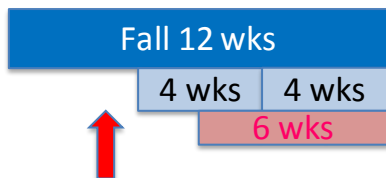
- Maria has a three credit-hour class in the second 6 week module
- Maria has a three credit-hour class in the second 4 week module and the third 4 week module
- What is the earliest Maria’s Title IV disbursement can occur?

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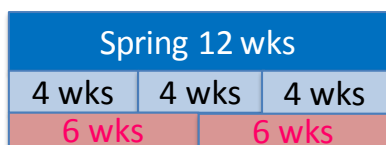
Standard Term – Quarters – Disbursements



Example 4

- What is the earliest Maria’s Title IV disbursement can occur?
- 10 days before the start of Maria’s first class which, for Maria, is in the second 4 week module
 - School’s option to disburse this early, can be later

Standard Term – Quarters – Origination



Example 5

- Andre has a three credit-hour class in the first 4 week module and a three credit-hour class in the second 4 week module
- Andre has no classes in the third 4 week module
- Andre has received no DL funds for this AY...yet

Modules and TIV – Advanced Concepts

Standard Term – Quarters – Origination

Spring 12 wks

4 wks

4 wks

Example 5

- Andre comes to you during the third module of the Spring term after completing Mods 1 and 2 and says he is going to need a student loan to help meet the costs of attending school
- Can you originate a DL for Andre during the third module of the Spring Term?

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Standard Term – Quarters – Origination

Spring 12 wks

4 wks

4 wks

Example 5

- Can you originate a DL for Andre during the third module of the Spring Term?
 - Yes!
 - Assuming Andre has not graduated or withdrawn, he is still enrolled as a half-time student for Spring
 - The DL can be originated and disbursed
 - This is NOT a late disbursement

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Modules and TIV – Advanced Concepts



What Does Summer Have to do With Modules?

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Summer Terms

- Most Summer terms contain multiple or mini-sessions (e.g., Summer 1, Summer 2, and Summer 3)
 - These are considered modules
- School has options
 - Combine mini-sessions into a single term
 - Treat as stand-alone terms
 - Could result in entire program being a nonstandard term program
- *Awards of Title IV aid must be made for Summer*
 - Option to not pay Title IV aid for enrollment in Summer, intersessions, J terms, Maymester, etc., does not exist

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Summer Terms: Pell Grant

- If a combined mini-session term crosses over the award year, the combined term is treated as a crossover payment period, regardless of what classes the student attends
- If mini-sessions are not combined into a single term:
 - Each mini-session is generally treated as a separate nonstandard term
 - Pell Grant Formula 3 must be used
 - *Exception:* If full-time for each mini-session is defined as 12 credit-hours, Formula 1 may be used

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Summer Terms: Direct Loans

- Scheduled Academic Year (SAY) and mini-sessions
 - May be grouped together into either a header or trailer to the SAY
 - May be treated separately and assigned to different SAYs
- Borrower Based Academic Year #1 (BBAY1) and mini-sessions
 - Must be grouped together as a single term in order to use BBAY
- Loan period
 - Shortest period of time a loan may be originated for is the term
 - Even if the student is attending fewer mini-sessions than comprise the term
- COA for Summer cannot include costs for mini-sessions the student is not expected to be enrolled

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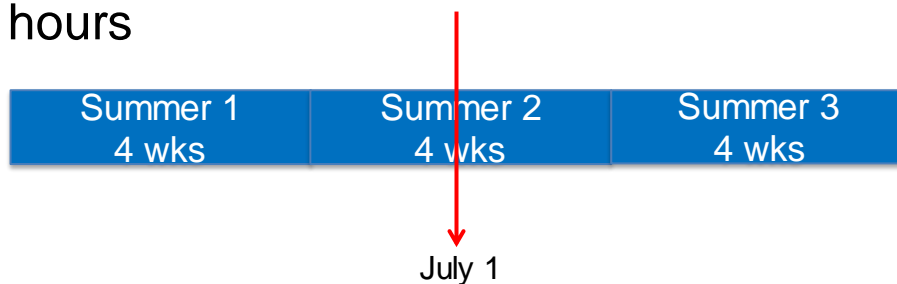
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Summer Example Calendar

- Summer mini-sessions 1, 2, and 3 combined to make one Summer payment period (term)
- Full-time enrollment is defined as 12 semester hours



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Summer Example 6 - Thomas

- Thomas taking six credits all in Summer 1 - awarded a Summer only loan and has Pell Grant as header to upcoming award year
 - Enrollment status is $\frac{1}{2}$ time
 - Loan period comprises entire Summer term
 - If school is required to make multiple disbursements, second disbursement will not be made until the calendar midpoint: after the student has completed classes
 - Summer 1 does not have to crossover for student to receive a Pell Grant disbursement from upcoming award year because combined Summer term is a crossover payment period

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Modules and TIV – Advanced Concepts

INTERSESSION
Earn up to 6 credits in 4 weeks!

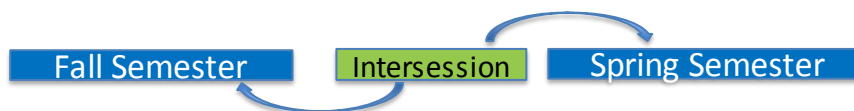
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Standard Terms: Intersections

- How to deal with intercessions or other additional terms and keep your program standard?
 - J-terms
 - Maymester
 - Mini-session
- Add the intercession to one standard term or the other > > >
 - Treat the entire combined term as one payment period



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What's the Loan Period?

- The minimum loan period in a standard term calendar is one of the standard terms
- When an intersession is attached to a standard term, it may, or may not, affect the length of the loan period



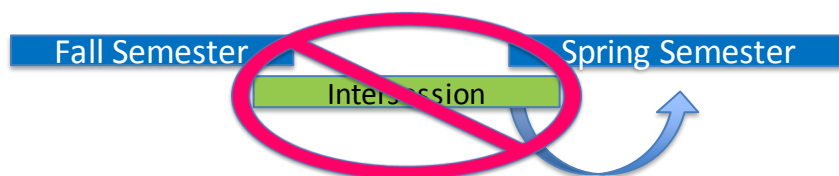
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Standard Terms: Intersessions

- Sometimes the intersession will overlap with the term to which it is attached and the other term



- That's not okay
- These are now overlapping terms and overlapping terms create a non-term calendar

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Modules and TIV – Advanced Concepts

Explanatory Guidance- The Two Week Tolerance



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Explanatory Guidance – Two Week Tolerance

- Two week tolerance for standard terms
- Normally, classes offered in a standard term calendar are expected to take place within the confines of a standard term
- Those classes may be a module or not
- If the class or classes, within an academic program, exceed the confines of the standard term by more than two weeks, it renders the term nonstandard and the program will be nonstandard
- If the class or classes, within an academic program, exceed the confines of the standard term by two weeks or less (and does not overlap any other terms), the term remains standard

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Explanatory Guidance – Two Week Tolerance

- It is a TOTAL of two weeks
 - Not two weeks per class
- If History 201 extends the semester by one week at the end and Geology 201 starts 10 days before the semester AND these are part of the same academic program, the two week tolerance has been exceeded since we are looking at 17 days
- *The two weeks must be contiguous to the term*
 - No unreasonable breaks between the class extensions and the term itself

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Explanatory Guidance – Two Week Tolerance

- *The two weeks must not overlap another term*

Fall Semester

Spring Semester

History 201

Two week extension of History 201

- History 201, a Spring Semester class is not exceeding the two week tolerance and it is not overlapping another term

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Modules and TIV – Advanced Concepts

Explanatory Guidance – Two Week Tolerance

- The two weeks must not overlap another term



Two week extension of Math 201

- Math 201, a Spring Semester class is not exceeding the two week tolerance but it is overlapping another term
- Overlapping terms = a non-term calendar/program

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Consortium Agreements When One School Has Modules and the Other School Does Not



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Consortium Agreements – Academic Calendar

- Institution that awards Title IV should award based on its own calendar
- Earliest disbursement date is 10 days before earlier of the start date at either the home or host school
 - COD limitations may apply

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Consortium Agreements – Academic Calendar

- Program's academic year is not affected if coursework taken at a host school overlaps or does not take place in the same timeframe as the home school's normal terms
 - If the home school is awarding aid, it must include credits taken at the host school in the student's enrollment status for a term that occurs at a time reasonably similar to the timeframe for the host school's coursework

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Consortium Agreements – SAP

- SAP must be evaluated by the home school using its own standards
 - A different timeframe may be established if a student is in a consortium agreement; the institution must publish clear information about the intervals for students in a consortium
 - If a student is still engaged in coursework at the host school when the home school evaluates SAP, the coursework must be treated according to the institution's policies for incomplete coursework under an SAP evaluation

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Consortium Agreements – R2T4

- R2T4 calculation must be completed by the institution that awards and disburses the student's Title IV aid
- Denominator includes all the days the student is scheduled to attend at both the home and host school
- Numerator includes all the days attended at either institution
- Institutional charges are those assessed the student by either institution
- Requirements for programs offered in modules apply
 - Any coursework taken at either the home or host school that does not span the length of the payment period is considered a module

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Written Arrangements – Study Abroad

- Written arrangements between eligible U.S. institutions and foreign institutions are not consortium agreements because the foreign institution is considered to be an ineligible entity
 - Such written arrangements are contractual agreements
 - Home school is always the eligible U.S. institution
- Study abroad programs provided by the home school via an overseas location are not considered to be written arrangements
 - For such programs, rules apply as they would to any normal program, including the implications of overlapping terms

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Reporting



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Reporting for Intersessions

- Enrollment reporting
- COD Reporting



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What about Enrollment Reporting?

- Intersession is between Fall and Spring and is attached to Spring



- Student's total hours for the Intersession and Spring are reported to NSLDS as the enrollment status for the combined payment period
- Do not treat Intersession hours separately from the term to which it is attached

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Modules and TIV – Advanced Concepts

What about Enrollment Reporting?

- Intersession is between Fall and Spring and is attached to Spring



- Payment period begins with the attached intersession, if student has a class(es) in the intersession
- Payment period begins with the actual semester (Spring in this example) if student has no class(es) in the intersession

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What about R2T4 and # of Days?

- Intersession is between Fall and Spring and attached to Spring



- Payment period includes days in intersession and the semester, if student has a class(es) in the intersession and semester
- Payment period includes the days in the intersession only if student has a class(es) only in the intersession
 - Treated like a module of spring semester
- Payment period includes the days in the semester only if student has a class(es) only in the semester

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What about COD Reporting?

- Intersession is between Fall and Spring and is attached to Spring



- Full year loan period would be reported for student who has Fall and Spring classes regardless of whether the student has classes in the intersession

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What about COD Reporting?

- Intersession is between Fall and Spring and is attached to Spring



- One term loan period, beginning with the beginning of the Intersession and ending with the end of Spring, is reported for student who has classes in both the Intersession and Spring

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Modules and TIV – Advanced Concepts

What about COD Reporting?

- Intersession is between Fall and Spring and is attached to Spring



- One term loan period, beginning with the beginning of the Intersession and ending with the end of Spring, is reported for student who has classes only in the Intersession
 - The intersession alone is too short to be a loan period
 - It is a module within the term

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What about COD Reporting?

- Intersession is between Fall and Spring and is attached to Spring



- One term loan period, beginning with the beginning of the Spring semester and ending with the end of Spring, is reported for student who has classes only in Spring

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Modules and TIV – Advanced Concepts

Reporting for Consortium Agreements

- School that awards TIV aid is responsible for reporting to COD
 - Academic year, loan period, and disbursement dates reported to COD should be those of the school which is awarding the aid
- Enrollment Reporting data must always be reported to NSLDS by the home institution
 - Home institution is responsible for prompt and accurate reporting to NSLDS of a student's withdrawal or graduation dates, changes in enrollment status
 - Must be accomplished under the Department's normal requirements for such reporting

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Training Feedback

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- Go to <http://s.zoomerang.com/s/DavidBartnicki>
 - Evaluation form is specific to David Bartnicki
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for “listening” to our customers
- Additional feedback can be directed to mark.gerhard@ed.gov

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