

Calendars, Modules, and Title IV (oh, my!)



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Why this Topic?

- Academic calendar impacts how Title IV aid is administered for program of study
- Modules can in some cases significantly impact a program's academic calendar, which in turn affects Title IV
- Academic programs continue to innovate around course scheduling and delivery, and Financial Aid Administrators need to know (and be able to communicate) how this impacts student aid



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Agenda

- Academic Calendars
- Modules
- Summer Term
- R2T4 Considerations
- Intersessions
- Explanatory Guidance
- Resources



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3 Main Academic Calendars

- Standard term
- Nonstandard term
- Nonterm
 - Clock-hour
 - Credit-hour



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Regs for Standard Terms and Nonstandard Terms

- Regulations are written from the standpoint that the school has set up a program to operate on a standard term calendar, a nonstandard term calendar, or a nonterm calendar
- Regulations are not set up, nor has extensive guidance been developed, for a program that drifts from one calendar to the next during the program
 - Generally, a program is offered using ONE calendar, not a combination
- ED has issued guidance that says one nonstandard term in a program makes the program nonstandard, with some exceptions that will be discussed later in this session

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Term – Standard or Nonstandard

- Definition: a discrete period of time during which all associated courses are scheduled to begin and end
 - Course start and end dates must reflect the boundaries imposed by terms
 - Courses with start and end dates that overlap terms call into question a program's term-based status
- Within a term: full-length courses, compressed courses or modules, courses offered sequentially
 - Although start and end dates are defined, flexibilities regarding how coursework is delivered within the term exist

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Standard Term

- Semesters
 - 15-17 weeks
- Trimesters
 - 15-17 weeks
- Quarters
 - 10-12 weeks
- Full-time enrollment is at least 12 credit hours
- Terms are the payment period for all Title IV programs
 - Summer may be an exception

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Standard Term Flexibilities

- May be offered traditionally—example:
 - All courses begin and end on the first and last day of the term respectively
- May be offered nontraditionally—examples:
 - Courses offered consecutively/sequentially within the term
 - Compressed coursework (modules, mini-terms, etc.)
 - Modules can overlap each other within the term

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Standard Terms and Title IV

Payment period?	The term
Pell formula used?	Typically Formula 1 <ul style="list-style-type: none"> • Small number use Formula 2 • All term-based programs may use Formula 3
Academic year used for Direct Loans?	SAY, BBAY1, or may alternate
Can use a 1-term loan period?	Yes



SAY = Scheduled Academic Year
 BBAY1 = Borrower-Based Academic Year 1

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Nonstandard Term

Put simply, nonstandard terms are any terms that do not fit the definition of standard terms

- Might be shorter or longer than standard terms
- May look like standard terms but be nonstandard due to awarding a type of credit not usually associated with that type of term
 - For example, a standard quarter but student earns semester credits

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3 Types of Nonstandard Terms

- Nonstandard terms that are substantially equal and at least 9 weeks (SE9W)
 - Substantially equal means no term is more than 2 weeks of instructional time longer than any other term in the program
- Nonstandard terms that are substantially equal (SE)
- Nonstandard terms that are NOT substantially equal (NSE)

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Nonstandard Terms and Title IV

	SE9W	SE	NSE
Payment period?	The term	The term	For Pell, the Term; For DL, works like nonterm programs (half the hours and weeks in the loan period)
Pell formula used?	Formula 3	Formula 3	Formula 3
Academic year used for Direct Loans?	May use SAY or BBAY1 if the program has a scheduled academic year, otherwise BBAY2	BBAY3	BBAY3
Can use a 1-term loan period?	Yes	No	No

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Advantages of Standard over Nonstandard Terms

- Standard terms may use Federal Pell Grant Formula 1
- Consistency in disbursement rules across programs
 - Payment period is always the term for all Title IV programs
- Flexibility with SAY and BBAY 1
- May originate single-term loans
- Treatment of Summer terms
 - Both the Pell Grant and DL programs allow for treatment of Summer as a standard term (with conditions)

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Nonterm

Academic programs that for Title IV purposes are not administered in terms

- All clock-hour programs must be nonterm for Title IV
- Nonterm programs may be credit hour



If a program has terms that overlap each other, the program is nonterm for Title IV purposes
 (This becomes very important when it comes to modules!)

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Nonterm Programs and Title IV

Payment period?	½ the hours AND weeks in the school's definition of an academic year; or ½ the hours AND weeks remaining in the program (if shorter than an academic year)
Pell formula used?	Formula 4
Academic year used for Direct Loans?	BBAY3
Can use a 1-term loan period?	No (as there are no terms)

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Modules

What is a module?

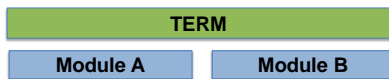
- Any period of enrollment that is shorter than a school's regularly scheduled academic periods that either falls within but does not span an entire term, and/or falls between a school's regularly scheduled academic periods
 - Sometimes schools have other names for modules:
 - Mini-session
 - J-term
 - Intercession
 - Segment
- Regardless of what the school calls these sessions, ED considers them to be modules

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What do Modules Look Like?

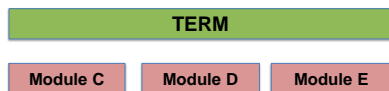


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What do Modules Look Like?



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What do Modules Look Like?

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What do Modules Look Like?

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How Do We Deal With Modules?

It depends upon many variables...


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Modules and Nonterm Calendars

- In a nonterm calendar, modules have very little impact
- There are no terms to be affected by modules
- Student completes a payment period by successfully completing hours (clock or credit), and completing weeks of instruction
- Whether the instruction is presented in modules or not generally does not affect the payment periods
- It is possible that a school may not be able to determine if hours have been successfully completed until the conclusion of a module


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Modules and Nonstandard Terms

Modules Are Contained Within Longer Nonstandard Terms


In most cases, the term is the payment period

Treated similarly to how modules are handled in a standard term program

Modules Themselves are Freestanding Terms

If SE: The term is the payment period

If NSE: The term is the payment period **except** for DL, which is disbursed as though nonterm



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3 Semesters

Spring Semester		Summer Semester		Fall Semester	
Spring 1	Spring 2	Summer 1	Summer 2	Fall 1	Fall 2

6 Modules

Modules and Standard Term Calendars


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Standard Term Example

- 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

Fall 16 wks		Spring 16 wks	
8-wk module	8-wk module	8-wk module	8-wk module

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What Do We Have to Think About In Our Example?



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Disbursement Considerations

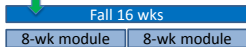
- Payment period is the entire standard term (semester)
 - Regardless of student's enrollment in classes over the entire semester, modules, or both
- Payment of Title IV (except FWS) is calculated on a payment period basis, not by individual module
 - However, it is allowable to break up the payment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

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Pell Recalculation Considerations

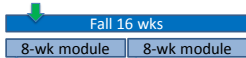
- School uses Example 1 calendar and has a Pell recalculation date of September 21, which falls before the start of Module 2
- As of the Pell recalculation date, John is enrolled for 9 credits
- On September 23, 2 days after the Pell recalculation date, John adds 3 credits from Module 2; Pell enrollment status must not be changed to add the additional credits due to school's Pell recalculation policy



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Pell Recalculation Considerations

- A different school uses Example 1 calendar and uses multiple Pell recalculation dates and must recalculate Pell up to the Pell recalculation date for the last class in which the student enrolls
 - September 7 for Module 1 (Orange arrow)
 - September 21 for the full semester (Green arrow)
 - November 1 for Module 2 (Blue arrow)
- As of September 21 Pell recalculation date, Paul enrolled for, and began 12 credits from full semester
- On October 3, he drops 6 credits
- On October 20, he adds 3 credits from module 2
- As of the November 1 Pell recalculation date for Module 2, Paul is enrolled for 9 credits; final Pell enrollment status is ¾ time



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Pell Grant Considerations

- Student must begin every class used to determine enrollment status
 - At school using Example 1 calendar with a single Pell recalculation date, George enrolls for 6 credits in Module 1 and 6 credits in Module 2
 - As of the September 21 Pell recalculation date, he is still enrolled for all 12 credits (enrollment status = full time) with a disbursement made based on that enrollment status
 - However, on September 25, George drops the 6 credits in Module 2
 - Although the Pell recalculation date is past, his enrollment status must be adjusted to ½ time and his award recalculated because he never attended any class(es) in Module 2
 - This is a mandatory Pell Recalculation

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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 6 credits all from Module 1; loan period is the entire semester, not Module 1
- Loan eligibility for a term-only loan is COA – EFC (for subsidized loans) – 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 (PRD) is not applicable to Direct Loan, only Pell/TEACH Grant/Iraq-Afghanistan Service Grant
- Enrollment status is checked at the time of disbursement
- Recalculations are not required
- Ringo enrolls for 6 credits (3 in Module 1 and 3 in Module 2); student begins attendance in Module 1; loan is disbursed (enrollment status ½ time); he never begins attendance in Module 2
 - Loan disbursement is correct; no adjustment or recovery of loan funds
 - Must adjust Pell if it was included in his award package
 - Possible R2T4 issues associated with student not taking all modules he was scheduled to take

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DL COA and EFC – Case Study 1

- Julian is going to attend Fall and Spring Semesters
- BUT, he is only attending classes in Module 1 of Fall and Module 1 of Spring
 - What is Julian's loan period?
 - What is his COA and EFC for Direct Loans?

Fall 16 wks

Spring 16 wks

8-wk module

8-wk module

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DL COA and EFC – Case Study 2

- Sean is going to attend Fall and Spring Semesters
- He is attending classes in Modules 1 and 2 of Fall and Modules 1 and 2 of Spring
 - What is Sean's loan period?
 - What is his COA and EFC?

Fall 16 wks		Spring 16 wks	
8-wk module	8-wk module	8-wk module	8-wk module

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DL COA and EFC - Case Study 2


- Sean decides to drop classes in Fall Module 2 and Spring Module 2
- His enrollment pattern ends up looking like Julian's
 - What is Sean's loan period?
 - What is his COA and EFC?

Fall 16 wks		Spring 16 wks	
8-wk module	8-wk module	8-wk module	8-wk module

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What Do We Do With Summer?

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Summer Terms

- Many Summer terms contain multiple or mini-sessions (e.g., Summer 1, Summer 2, and Summer 3)
 - These are considered modules
- School has options
 - Combine modules into a single term
 - Numerous advantages
 - Treat modules 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 simply not pay Title IV aid for enrollment in Summer, intersessions, J terms, Maymester, etc., does not exist

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Summer Terms: Pell

- If term-based program offers a series of modules that occur in the Summer, they may be combined and treated as if it was one term and that term will be the payment period (which will have modules)
- If program qualifies for Formula 1 or 3, use the same formula to calculate Pell for Summer
 - If program does not define full-time for Summer as 12 credit-hours, Formula 3 must be used for **all** calculations in the award year
 - Full-time definition for Summer must be applied across all programs
- When modules are combined into a single term:
 - Weeks of instructional time in the combined term are weeks from beginning of the first module to date the last module ends
 - Student's enrollment status for the payment period is based on the total number of credits for all modules

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Summer Terms: Pell

- If a combined summer term crosses over the award year, the combined term is treated as a crossover payment period, regardless of which modules 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 Formula 3 generally must be used

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Summer Terms: Direct Loan

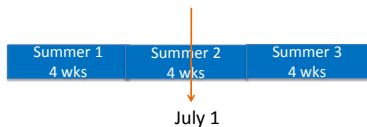
- SAY and modules
 - May be grouped together into either a header or trailer to the SAY
- BBAY and modules
 - **Must** be grouped together as a single term in order to use BBAY
 - BBAY containing Summer term (regardless of whether comprised of modules) does not have to be 30 weeks in length—applies to BBAY 1 only
- Loan period
 - Shortest period of time a loan may be originated for is the term
 - Even if the student is attending fewer modules than comprise the term
- COA for Summer loans cannot include costs for modules the student is not expected to be enrolled

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Summer Example 1

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



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Summer Example 1 - James

- James is taking 6 credits all in Summer 1, is awarded a Summer-only loan and a Federal Pell Grant as a header to the upcoming award year
- Enrollment status is ½ time
- Loan period comprises the entire Summer term or payment period
 - 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 James to receive a Pell Grant disbursement from the upcoming award year because the combined Summer term is a crossover payment period

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Summer Example 1 – Jean Luc

- Jean Luc is taking 9 credits: 3 credits in Summer 1, 3 credits in Summer 2, and 3 credits in Summer 3
- Enrollment status is ¾ time
- Loan period comprises Fall/Spring/Summer
- School's policy for crossover payment periods is that it determines Pell eligibility for a crossover payment period on a student-by-student basis and pays from the award year most advantageous to the student

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Summer Example 1 – Jean Luc

- Jean Luc was full time in the previous Fall and Spring payment periods and received 100% of his Pell Grant
- He is paid a ¾ time Pell for Summer from the next award year and the disbursement is made at the start of Summer 1
- He is disbursed DL Funds for Summer payment period (the Loan Period is Fall/Spring/Summer)

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Summer Example 1 – Jean Luc

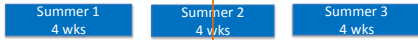
- He received a ¾ time Pell for Summer and a DL disbursement for Summer based on expected enrollment 3 hours in each Summer module
- Jean Luc actually completes Summer 1 and 2, but does not return for Summer 3
 - Pell Grant is subject to a mandatory Pell Recalculation
 - Does not matter what School Pell Recalculation Policy says
 - No adjustment to Direct Loan disbursement
 - Student was ½ time or more at the time of DL disbursement
 - Possible R2T4 implications
 - Student MAY be beyond the 60% point of the payment period or may have dropped Summer 3 classes before the end of Summer 2 or may be a withdrawal

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Summer Example 2

- School does not wish to define full-time enrollment status as 12 credit-hours
- Each Summer session becomes a nonstandard term
 - Enrollment status = $\frac{\text{Credit-hours in Academic year}}{\text{Weeks in nonstandard term}} \times \frac{\text{Weeks in academic year}}{\text{Weeks in academic year}}$
- Only Summer 2 is a crossover payment period



REMEMBER! These are NOT modules, they are non-standard terms

This choice results in the entire Program being nonstandard term. Pell Formula 3 must be used and the disbursement rules for nonstandard terms not substantially equal in length followed.

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Summer Enrollment Awareness

- Student may enroll in multiple Summer modules and complete one or more, but not all of them
 - e.g., Student enrolls in Summer 1, 2, and 3, completes Summer 1 and 2, but does not return for Summer 3
 - Typically, students do not see this as a withdrawal; however, under current regulations, R2T4 may apply
- Important that students enrolling in multiple Summer modules are instructed to withdraw from or drop the subsequent session(s) prior to completing the previous one if they do not intend to return
 - This will help prevent the student from being subject to R2T4

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R2T4 and Modules



Withdrawal Defined

- Student does not complete all days scheduled to complete within the payment period/term (whether official or unofficial withdrawal)
- School must document that the student completed all courses with a passing grade
- If no passing grade in last scheduled course, school must demonstrate student completed period

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Administrative Withdrawals

- An administrative withdrawal initiated by the school is considered an official withdrawal
- A school may drop a student from a class in a future module because the student failed a prerequisite class in a prior module

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Calendar Days - Credit Hour Modules

- Total calendar days include all days in which the student was scheduled to attend
- Days of attendance in courses count regardless of whether module(s) were completed
- Exclude scheduled breaks of at least 5 consecutive days when student is not scheduled to attend a module or other course
 - Includes allowable breaks between modules (as long as not attending other courses during the break)
- *When a student who has made schedule changes withdraws, do not count attendance in courses officially dropped prior to withdrawal*

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Impact of Enrollment Status Changes

- Adjustments to a student's enrollment status made after a student has ceased attendance have no bearing on the R2T4 calculations
- If a student enrolled in 3 modules, completes one, and then drops the remaining two after ceasing attendance, all days in all three modules will be included in the R2T4 calculation
- This can apply to situations where a student drops all future modules during a break between modules

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Impact of Enrollment Status Changes

- If a student drops all future courses on the same day they withdraw from a current module (or complete a module – last day of module), it is considered a withdrawal and all days in all modules the student was scheduled to attend must be included in the R2T4 calculation

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Written Confirmation Of Return

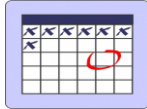
Student in a modular program not considered a withdrawal if they provide written confirmation of intent to attend later module in the payment period

- Must be provided at the time of withdrawal
- Can be paper or electronic process
- Registration for future modules does **not** constitute written confirmation
- Student may change return date in writing
 - Must provide change prior to original return date

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Written Confirmation Of Return

- Nonstandard term and Nonterm programs
 - Student considered to be withdrawal if not scheduled to begin another course in period of enrollment for more than 45 calendar days



45 days measured from end of module ceased attending

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What if the Student Doesn't Return?

- Student considered to be withdrawal if does not return as scheduled
- Withdrawal date is retroactive to when written confirmation was originally provided
 - Determine withdrawal date and days of attendance as if written confirmation was never provided
 - The date the student was scheduled to return is the date of the school's determination of withdrawal

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Return After Withdrawal

- If returning in the same payment period, the student is treated as if did not cease attendance
 - The school must "undo" the R2T4 calculation
- Restore student's original amounts with no adjustment for partial attendance of a module
 - Except if a student never began all of their courses
 - Adjustments may need to be made to the original Title IV award amounts, such as Pell Grant recalculations

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R2T4 and Pell Grant Recalculation

- Remember that if a student does not begin attendance in all of his or her classes, resulting in a change in the student's enrollment status, your school must recalculate the student's award based on the lower enrollment status
- If a school learns a student did not begin attendance in all courses and an R2T4 calculation is required, reduce and return Pell funds first if Pell recalculation required
 - R2T4 calculation will reflect adjusted Pell amount

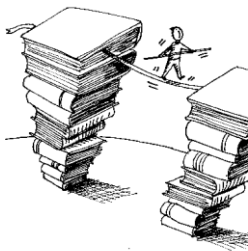
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Did the Student Withdraw?

1. Did the student cease to attend before completing, or fail to begin attending, a course scheduled to attend?
 - If yes, go to question 2
 - If no, student is not a withdrawal
2. When ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses?
 - If yes, student is not a withdrawal
 - If no, go to question 3
3. Did the student confirm attendance in a later module in the payment/enrollment period (45 day rule, if applicable)?
 - If no, student is a withdrawal
 - If yes, student is not a withdrawal, but Pell recalculations may apply

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Intersessions

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Standard Terms: Intersections

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



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Standard Terms: Intersections

- Doesn't adding the intercession make a nonstandard term?
- FSA's guidance states that for a program already using established standard terms, adding a term that is immediately prior to or after the standard term, which does not overlap with another term, keeps the standard terms as standard



- Does create a term with modules
 - Intercession is a module
 - Standard term is a module

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Standard Terms: Intersections

- Sometimes the intercession will overlap with the term to which it is attached



- That's OK!
- **Modules** can overlap

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What do Modules Look Like?

Remember this...

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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** OK!
- These are now overlapping terms, which created a nonterm calendar

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Standard Terms: Intersessions

- Starfleet Academy has two 15-week semesters with a 4-week intersession between them
- School attaches the intersession to Spring semester
 - If school does not attach the intersession it would create a non-standard term

Starfleet Academy Calendar

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Payment Periods: Pell

- Fall semester is Payment Period (PP) 1
- The combined intercession and Spring semester is PP 2
- School may still use Pell Formula 1
 - Terms are still considered standard
 - Must use 12 hours (or more) as full-time
 - The Pell disbursements for each payment period will be equal
- Hours in intercession count toward Spring enrollment status
- Pell COA is for full year, full-time costs regardless of whether or not student has hours in intercession

The diagram shows three boxes: 'Fall Semester' (blue), 'Intercession' (green), and 'Spring Semester' (blue). A bracket below 'Fall Semester' is labeled 'PP 1'. A bracket below 'Intercession' and 'Spring Semester' is labeled 'PP 2'.

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Payment Periods: DL

- Fall semester is Payment Period (PP) 1
- The combined intercession and Spring semester is PP 2
 - PP 2 now has two modules, the intercession and the 15 week semester
- School may use SAY or BBAY 1
- Hours in intercession count toward Spring enrollment status
- COA for loans reflects costs associated with all terms that school knows student will pursue at time of origination

The diagram shows three boxes: 'Fall Semester' (blue), 'Intercession' (green), and 'Spring Semester' (blue). A bracket below 'Fall Semester' is labeled 'PP 1'. A bracket below 'Intercession' and 'Spring Semester' is labeled 'PP 2'.

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Payment Periods: DL

- Kathryn takes 9 hours in the Fall, 3 hours in the intercession and 3 hours in the Spring
- Kathryn's COA includes costs for all 3 periods
- Kathryn is at least half time in PP 1 and receives her disbursement for PP 1 at or about the beginning of PP 1, assuming she is not subject to delayed disbursement
- Kathryn is at least half time in PP 2 and receives her second disbursement at or about the beginning of PP 2, which is the beginning of the intercession

The diagram shows three boxes: 'Fall Semester' (blue), 'Intercession' (green), and 'Spring Semester' (blue). A bracket below 'Fall Semester' is labeled 'PP 1'. A bracket below 'Intercession' and 'Spring Semester' is labeled 'PP 2'. Dollar signs (\$) are placed above the 'Fall Semester' and 'Intercession' boxes.

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Explanatory Guidance



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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 non-standard and the program will be non-standard
- If the class or classes, within an academic program, exceed the confines of the standard term by two weeks or less, the term remains standard

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Explanatory Guidance – Two Week Tolerance

- This allowance is a TOTAL of two weeks
 - **Not** two weeks per class
 - If History 201 extends the semester by 1 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 extension and the term itself

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Explanatory Guidance – Two Week Tolerance

- The two weeks must not overlap another term

The diagram shows two blue boxes labeled 'Fall Semester' and 'Spring Semester'. A green box labeled 'History 201' is positioned below the 'Spring Semester' box, extending slightly past its right edge. A blue arrow points from the text 'Two week extension of Hist 201' to the right side of the 'History 201' box.

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

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Explanatory Guidance – Two Week Tolerance

- The two weeks must not overlap another term

The diagram shows two blue boxes labeled 'Fall Semester' and 'Spring Semester'. A green box labeled 'Math 201' is positioned below the 'Spring Semester' box, extending slightly past its right edge. A blue arrow points from the text 'Two week extension of Math 201' to the right side of the 'Math 201' box.

- 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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Explanatory Guidance – Clinical Work and Standard Terms

- Some programs follow a strictly standard term calendar until the student progresses to a part of the program that involves work outside of the classroom but still part of their academic program
 - We will refer to this as clinical work
- Often found in medical related fields and in programs preparing educators
- This clinical work may not coincide with the institution's standard terms
 - Usually due to the clinical work having a different calendar

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Explanatory Guidance – Clinical Work and Standard Terms

- Institutions may allow, for Title IV purposes, the clinical work to be treated as if it were being offered on the school's standard term calendar, if ALL of the following apply:
 - All students in the program must participate in the practicum or clinical experience and its completion is a requirement for graduates to apply for licensure or the authorization to practice the occupation those students intend to pursue
 - The institution has little or no control over the length or start/end dates of the practicum or clinical experience. This may be the result of constraints imposed by outside licensing bodies, or the need to accommodate the schedules of entities with which students are being placed (e.g., school districts and hospitals)
 - Credit hours associated with the practicum or clinical experience must be associated with the term in which most of the training occurs, even if the starting and ending dates do not exactly align with the term dates and/or overlap with another term exists

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Explanatory Guidance – Clinical Work and Standard Terms

- If the clinical work meets all of the requirements on the previous slide
 - The clinical work will not create nonstandard terms
 - The clinical work will not create a nonterm calendar even if the clinical work is overlapping another term

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Explanatory Guidance – Clinical Work and Standard Terms

Rules to remember for clinical work in this category

- Policies and Procedures must explain how this aspect of Title IV administration is being handled by the school
- The academic year and loan period for Direct Loans should be determined using the actual training dates and the loan should reflect the cost of attendance and estimated family contribution for the actual training period
- Return of Title IV funds (R2T4) calculations are based on a payment period or period of enrollment that reflects the actual training dates

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Resources

- FSA Handbook
 - Volume 3: Chapter 1 (Academic Calendars), Chapter 3 (Pell), Chapter 5 (DL)
 - Volume 5 (R2T4)
- Program Integrity Q & A website
 - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>
- Dear Colleague Letter GEN-11-14 (July, 2011)
- FSA Assessments
 - Direct Loan and R2T4 modules
 - <http://www.ifap.ed.gov/qahome/fssaassessment.html>
- FSA E-Training Website
 - R2T4 Course
 - <http://fsatraining.info>

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Contacts

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Training Feedback

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

- Go to <https://www.surveymonkey.com/s/Massman>
- Evaluation form is specific to Joseph Massman
- 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 about training can be directed to JoAnn.Borel@ed.gov; 409-579-3776

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Questions?



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