The Effects of Modular Based Programs
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What Do Modules Look Like?

SEMESTER

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Module A
Module B
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How Do We Deal With Them?

It depends on a lot of variables.

Modules and Calendars

- The program’s academic calendar dictates how modules are dealt with when administering Title IV
- Academic calendars
  - Standard Term
  - Semesters, Quarters, and Trimesters
  - Non-standard Term
  - Any other term
  - Non-term
- No terms at all for Title IV purposes
- All clock-hour programs are nonterm
- Nonterm also may include credit-hour programs
Modules and Non-Term Calendars

• In a non-term 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

Modules and Non-Standard Calendars

• In a non-standard term calendar, modules will fall into two types
  • The first is where the modules themselves will be freestanding non-standard terms
    • If substantially equal in length, meaning no term is different by more than two weeks, the non-standard terms will be the payment period for all Title IV programs except FWS
    • If not substantially equal, the non-standard terms will be the payment period for all Title IV programs except FWS and DL
    • DL will be disbursed as if the calendar was non-term

• In most cases, the non-standard term will be the payment period for most Title IV programs
• Modules in a non-standard term calendar work very much like modules in a standard term calendar
Term – Standard or Non-Standard

- Definition: a discrete period of time during which all courses in the term are scheduled to begin and end
  - Courses 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

Advantages of Standard vs. Non-Standard Terms

- Standard terms may use Federal Pell Grant Formula
- Consistency in disbursement rules across programs
- Payment period is always the term for all Title IV programs
- Flexibility with SAY and BBAY
  - May always use SAY without SE9W considerations
  - May always use BBAY 1; allows alternating BBAY and SAY as long as overlap does not exist
  - May originate single-term loans without SE9W considerations
- Treatment of summer terms
  - Both the Pell Grant and DL programs allow for treatment of summer as a standard term (with conditions)

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 non-standard term program
- Awards of Title IV aid must be made for Summer
  - Option to not pay Title IV aid for enrollment in Summer, inter-sessions, J terms, etc., does not exist
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

Pell Grant Considerations

- Pell Grant recalculation policy may affect enrollment flexibilities
- School may use multiple Pell recalculation dates and must recalculate Pell up to the Pell recalculation date for the last class in which the student was enrolled
- Pell enrollment status must not be changed to add the additional credits due to school’s policy
- If Pell recalculation date is past, and the student never attended any class(es) in Module 2 then you must also adjust Pell accordingly
  - This is a mandatory Pell Recalculation

Example
September 7 for Module 1 (Red arrow)
September 21 for the full semester (Green arrow)
November 1 for Module 2 (Black arrow)

As of September 21 Pell recalculation date, student 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, he is enrolled for 9 credits; final Pell Grant enrollment status is ¾ time

Summer Terms: Pell

If term-based program offers a series of mini-sessions 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 mini-sessions are combined into a single term:
Weeks of instructional time in the combined term are weeks from beginning of the first mini-session to date the last mini-session ends
Student’s enrollment status for the payment period is based on the total number of credits for all sessions

Summer Terms: Pell

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 non-standard term
Pell Formula 3 must be used
Exception: If full-time for each mini-session is defined as 12 credit-hours, Formula 1 may be used
DL 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 (if subsidized) – EFA up to the applicable annual loan limit, not one half or some other portion of the annual loan limit

DL Considerations

- **Enrollment status**
  - Census date is not applicable to Direct Loan, only Pell/TEACH Grant/Iraq-Afghanistan Service Grant
  - Recalculations not required
  - Enrollment status is checked at the time of disbursement
  - Student 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); student never begins attendance in Module 2
  - Loan disbursement is okay; no adjustment or recovery of funds
  - Possible R2T4 issues associated with student not taking all modules she was scheduled to take

Summer Terms: Direct Loan

- SAY and mini-sessions
  - May be grouped together as either a header or trailer to the SAY
  - May be treated separately and assigned to different SAYs
- BBAY and mini-sessions
  - Must be grouped together as a single term in order to use BBAY
  - Must have a minimum term length (regardless of whether comprised of mini-sessions) does not have to be 30 weeks in length
- 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
Intersessions

Standard Terms: Intersessions

- How to deal with inter-sessions or other additional terms and keep your program standard?
  - J-terms
  - Mini-session
- Add the inter-session to one standard term or the other
  - Treat the entire combined term as one payment period
- Doesn’t adding the inter-session 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, and does not overlap with another term, keeps the standard terms as standard

Payment Periods: Pell

- Fall semester is Payment Period (PP) 1
- The combined intersession 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
- Hours in intersession count toward spring enrollment status
- COA is for full year, full-time costs regardless of whether or not student has hour in intersession
Payment Periods: DL

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

Return to Title IV: Example

- Student enrolls for 3 modules within a term each 35 days in length and with a weekend in between modules 1 & 2 and 2 & 3.
- Jacob begins and completes Module 1 and doesn't return for Modules 2 & 3 and does not contact the institution.
- Institution required to take attendance – WD = LEDA (e.g. last day he took a final exam).
  - The denominator = 109 days (35 x 3, plus 4 days between Modules).
- Institution NOT required to take attendance – WD = One of six options described in 34 CFR 668.22(c)(1)(i) – (v). The denominator = 109 days (35 x 3, plus 4 days between Modules).

R2T4 Definitions: “Written Confirmation”

- For courses offered in modules, a student is NOT considered to have withdrawn if:
  - For standard term programs, the institution obtains written confirmation that the student will return to complete a later module within the same PP or POE
  - For non-term and non-standard terms – the institution obtains written confirmation that modules begins no later than 45 calendar days after the end of the module the student ceased attendance
R2T4 Definitions: “Written Confirmation”

* Student can revise the date of return to a later module, if:
  * Student does so in writing, between the time of the withdrawal, but prior to the return date
  * For non-term and non-standard term programs, the module cannot begin later than 45 calendar days after the end of the module the student ceased attendance

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