


A HIGHER GRADE OF ACCOUNTANTS


How Modules Can Affect AWARDING
AND DISBURSING
Title IV Aid


What do Modules Look Like?



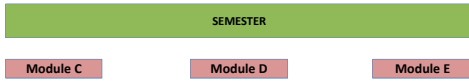


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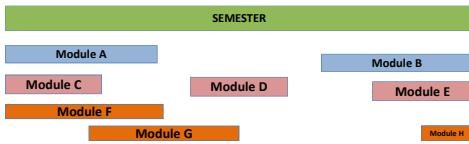




What do Modules Look Like?



What do Modules Look Like?



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



Modules and Non-Standard Calendars

- In a non-standard term calendar, modules will fall into two types
 - The second is where the modules themselves will not be freestanding non-standard terms
 - The modules will be contained within the non-standard terms that make up the academic calendar
- 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 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 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)



Standard Term Example 1

- Standard term, semester-based program
- Academic year is 30 weeks, consisting of two 15 week semesters
- Semester contains two 7 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 15 weeks | |
|---------------|-------------|
| 7-wk module | 7-wk module |

| Winter 15 weeks | |
|-----------------|-------------|
| 7-wk module | 7-wk module |



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



Cost of attendance

- Students enrolled in modules are treated differently than students enrolled for the whole term.
- The department requires we assign a cost of attendance (coa) only for the period of attendance. Therefore students who attend only 7 weeks of a 15 week semester will receive COA for only the seven week period.
- Students who enroll for the entire semester module A and B with, a one week break, is considered attending the full semester and does not require a reduced COA.



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 payment period (informational only)



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 enrolls
- 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



OLD REGULATIONS Administering Pell Recalculation for Modules



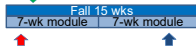
Example 1 Pell Grant Considerations

- Pell Grant recalculation policy affects enrollment flexibilities
 - You can have one Pell Grant recalculation date or multiple
 - The Pell Grant Recalculation date is what most colleges call the **census date**
 - Look at example below – it means the semester and modules (green arrow) have the same census date.
 - **Let's say your Fall census date was September 28th** That means
 - 1 – All classes (semester, Modules 1 and 2) must be registered for by September 21st if they are to be counted towards Financial Aid Status (Pell).
 - 2 – If a student adds a class (to the 2nd module for example) after the census date it will not be included in FA calculations. **FA NEEDS TO KNOW WHEN CLASSES ARE ADDED or HAVE A POLICY THAT DOES NOT ALLOW CLASSES TO BE ADDED AFTER CENSUS**



Example 2 Pell Grant Considerations

- Pell Grant recalculation policy affects enrollment flexibilities
 - Or you can use multiple Pell Grant recalculation date.
 - Look below – that means the semester and modules (green, red and blue) have multiple census dates.
 - **For Fall 2018 that date is September 21st (as would be Module 1)**
 - **For Module 2 (November 16th) That Means**
 - 1 – Value added – Students can add courses to semester, Module 1 and 2 through November 16th and still count towards FA
 - 2 – **HOWEVER**, Students can drop courses, usually frozen after September 21st and they will no longer be aid eligible courses. Nothing is absolutely frozen in time until March 17th



**NEW REGULATIONS
MORE OPTIONS
DECISIONS NEEDED
Administering Pell
Recalculations for Modules**



PRIOR REGS recap

4/24/17 ← → 8/5/17

15 Week Spring 2017 Semester

Mod 1 (4/27/17 – 6/10/17) Mod 2 (6/19/17 – 8/5/17)

PRD
5/17

Based on prior regulations interpretation, one official census date for the semester and module 1. Except for new students all credits must be registered for by PRD. Anything added or dropped after PRD does not impact FA. This includes semester and modules. If we had a second PDR for module 2 it would impact all students in modules or not.

There is an enrollment determination for Module 2 – just not a census date.

PRIOR REGS recap

4/24/17 ← → 8/5/17

15 Week Spring 2017 Semester

Mod 1 (4/27/17 – 6/10/17) Mod 2 (6/19/17 – 8/5/17)

PRD
5/19

PRD
7/14

Based on prior guidance having a second PDR for module two would also impact semester course – even those students not taking modules.

NEW GUIDANCE – OPTION

4/24/17 ← → 8/5/17

15 Week Spring 2017 Semester

Mod 1 (4/27/17 – 6/10/17) Mod 2 (6/19/17 – 8/5/17)

PRD
5/19

PRD
7/14

The New Module activated PRDs allows schools to have the PRD for Module 1 that is same as the semester as well as a PDR for Module 2. There are positives and negatives to this new interpretation. Please see next page to go over those details and see some examples.

Benefits and Problems with new guidance

- Module activated only impacts students in modules.
 - Second PRD will not impact 15 week only students unlike prior guidance where a second PRD affected everyone even if not in modules.
- Allows continuing students to add the 2nd module or add credits to the 2nd module after the first PRD and have it be aid eligible except for state aid (if a school wants to change their drop add policy).
 - It also impacts their FA if they drop any courses between the two PRDs. Currently their aid is frozen.



Benefits and Problems with ADOPTING NEW GUIDANCE (Continued)

- EXAMPLE – student takes 1st module for 6 credits and drops a course after PRD. Still eligible for ½ time Pell.
 - Then student registers for 2nd module. That activates the 2nd PRD. The 3 credit drop now must be considered and the 1st module is now only eligible for less than ½ time Pell.
- 2nd EXAMPLE- student is in a regular 15 week semester schedule. Mid way through, for whatever reason, student decides to drop all courses but before doing so registers for 3 credits in 2nd module. Student signs a notice of intent to return so we don't perform an R2T4.




Benefits and Problems with ADOPTING NEW GUIDANCE (Continued)

- 2nd EXAMPLE Continued - What happens here is that the student loses their FT Pell for the semester. The return of funds is not performed because of the module registration and notice of intent. Student would have earned 100% of Pell less R2T4 (which probably would have allowed him/her to keep it. Now the student loses the full semester Pell, but again less than half time eligibility due to the 3 credits in Module 2. At the same time the student liability from the 15 weeks as well as the module 2 registration AND ALL THIS MUST BE PROGRAMMED for because you cannot expect humans to track it.




R2T4 and Pell Grant Recalculation



R2T4 and Pell Grant Recalculation

- Student doesn't begin attendance in all classes in a term
 - 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, **FIRST** perform the Pell recalculation and then include the adjusted Pell amount in the R2T4 calculation
 - The Pell recalculation is a separate and distinct process from the R2T4 calculation




Withdrawal from a Program Offered in Modules

Q: How do I know when a student has withdrawn in a program offered using modules?

A: Use the following flowchart (also refer to decision tree handout):

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    graph TD
      S1[STEP ONE: After beginning attendance in the period, did the student cease to attend or fail to begin attendance in a course he or she was scheduled to attend?] --> S1_Yes[If YES, Go to STEP TWO]
      S1_Yes --> S2[STEP TWO: When the student ceased to attend or failed to begin attendance, was the student still attending any other courses?]
      S2 --> S2_Yes[If YES, this is not a withdrawal. However, other recalculation requirements may apply.]
      S2 --> S2_No[If NO, Go to STEP THREE]
      S2_No --> S3[STEP THREE: Did the student confirm attendance in a course in a module beginning later in the period?]
      S3 --> S3_Yes[If YES, this is not a withdrawal unless the student does not return.]
      S3 --> S3_No[If NO, this is a withdrawal.]
  
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Withdrawal from a Program Offered in Modules

- A student enrolled in a credit-hour program is considered to have withdrawn* if the student does not complete all the days in the payment period or period of enrollment that he or she was scheduled to complete.
- This includes cases where a student completes a module, but does not drop out of a future module that he or she was scheduled to attend.

*Unless the student provides written confirmation that he or she intends to return in a future module under certain circumstances



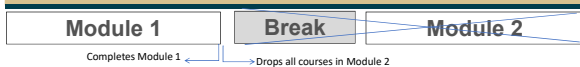
Withdrawal from a Program Offered in Modules

- A student who drops all future classes *between* modules he or she was scheduled to attend is considered to have withdrawn.

NOTE: If a student drops all future classes in a payment period or period of enrollment on the *same day* the student completes a module, or prior to completing the module, the student is not considered a withdrawal.



Withdrawal from a Program Offered in Modules: Example



- Jamie is scheduled for classes in both Modules 1 and 2
- Three weeks before the end of Module 1, he drops all courses in Module 2. Then he completes Module 1
- The student is considered to have completed the period because he was not scheduled to attend other courses when he ceased attendance. **No R2T4 calculation is required**
 - Pell must be recalculated using only classes attended in Module 1
 - Jamie was smart!




Other Considerations




William D. Ford Federal Direct Loan Considerations

- Loan period
 - Shortest period for which a loan may be originated is the term, not a module
 - For example, a student enrolls for the Fall 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



Direct Loan Considerations

- Enrollment status
 - Census date is not applicable to Direct Loan
 - 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 Return of Title IV funds (R2T4) issues associated with student not taking all modules she was scheduled to take



Other disbursement Considerations

- Students are not eligible for TAP disbursements until they start their FT load in Module B
- Are you going to disburse Pell in one or two disbursements?



Intersessions



Standard Terms: Intersessions

- How to deal with intersessions or other additional terms and keep your program standard?
 - J-terms
 - Mini-session
- Add the intersession to one standard term or the other
 - Treat the entire combined term as one payment period
- Doesn't adding the intersession 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 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
- Hours in intercession count toward spring enrollment status
- COA is for full year, full-time costs regardless of whether or not student has hour in intercession



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 reflects costs associated with all terms that school knows student will pursue at time of origination



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