



The Effects of Modular Based Programs

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What Do Modules Look Like?


SEMESTER



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- **Module A**
- Module B**



What Do Modules Look Like?

SEMESTER

Module A Module B

Module C Module D Module E

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)



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 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



Example



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

Fall 16 wks

8-wk module 8-wk module

- 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 $\frac{3}{4}$ 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 into 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
 - BBAY containing Summer term (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




Interessions




Standard Terms: Interessions

- 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 interession 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 interession count toward spring enrollment status
- COA is for full year, full-time costs regardless of whether or not student has hour in interession



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

Modules 1 Modules 2 Modules 3

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 = LDA (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) – (vi). 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



Determining Whether a Student Has Withdrawn from a Program Offered in Modules



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