

BREAKOUT SESSION #6

Academic Calendars

Byron Scott

U.S. Department of Education

2022 Virtual FSA Training Conference for Financial Aid Professionals

AGENDA

- Academic Calendars and Academic Years
- Academic Terms and *Title IV* Administration
- Types of Academic Years for William D. Ford Federal Direct Loan (Direct Loan) Program Administration
- Special Circumstances

ACADEMIC CALENDARS AND ACADEMIC YEARS

TYPES OF ACADEMIC CALENDARS

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

ACADEMIC CALENDAR AND *TITLE IV*

- Determine how the structure of the programs' academic calendars impacts *Title IV* administration
- Questions to ask
 1. Does the program have terms?
 2. Do the terms overlap?
 3. Are the terms standard?
 4. If nonstandard, are the terms substantially equal in length?

DEFINED ACADEMIC YEAR

- Every eligible program must have a defined academic year for *Title IV* purposes
- Used to determine payment periods and calculate Direct Loan awards
- Must be defined in writing in policies and procedures
 - Must use that definition for all students in the same program
 - Must use that definition for all *Title IV* purposes for the entire length of the program
- **Specify weeks of instructional time and credit or clock hours**
- Not dependent on start and end dates of award year

DEFINED ACADEMIC YEAR (CONT.)

- Program length may be shorter or longer than the definition of the academic year
- The academic year is sometimes confused with
 - Grade level classification, often defined by Registrar
 - Award year
- Regulation 34 C.F.R. § 668.3 defines minimum requirements

UNDERGRADUATE ACADEMIC YEAR MINIMUMS

	Minimum number of weeks of instruction	Minimum number of credit/clock hours
Programs that measure progress in semester or trimester credit hours	30	24
Programs that measure progress in quarter credit hours	30	36
Programs that measure progress in clock hours	26	900

See 34 C.F.R. § 668.3

GRADUATE ACADEMIC YEAR MINIMUMS

- For graduate programs, regulations specify the minimum number of weeks in an academic year, but there is no minimum standard specified for credit or clock hours
 - Schools define the minimum credit or clock hours as they wish
- Minimum number of weeks of instruction:
 - 30 weeks for programs that measure progress in semester, trimester, or quarter credit hours
 - 26 weeks for programs that measure progress in clock hours
- Defined academic year may be longer than minimum required

WEEK OF INSTRUCTIONAL TIME

- Any period of seven consecutive days in which at least one day of regularly scheduled instruction, exams, or after the last day of classes, at least one day of study for examinations occurs
 - Does not include orientation or counseling
 - Weeks cannot overlap, and a single day of scheduled instruction, exams, or study time cannot be used to create more than one week of instruction
 - May begin and end on a day other than Monday, as long as a week of instructional time is a seven consecutive day period
 - May begin up to six days prior to the first day of scheduled instruction or exams in a payment period
- See 34 C.F.R. § 668.3(b)

COUNTING WEEKS OF INSTRUCTIONAL TIME

Sun 25	Mon 26	Tue 27	Wed 28	Thu 29	Fri 30	Sat 1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31 ● Memorial Day	1	2	3	4	5

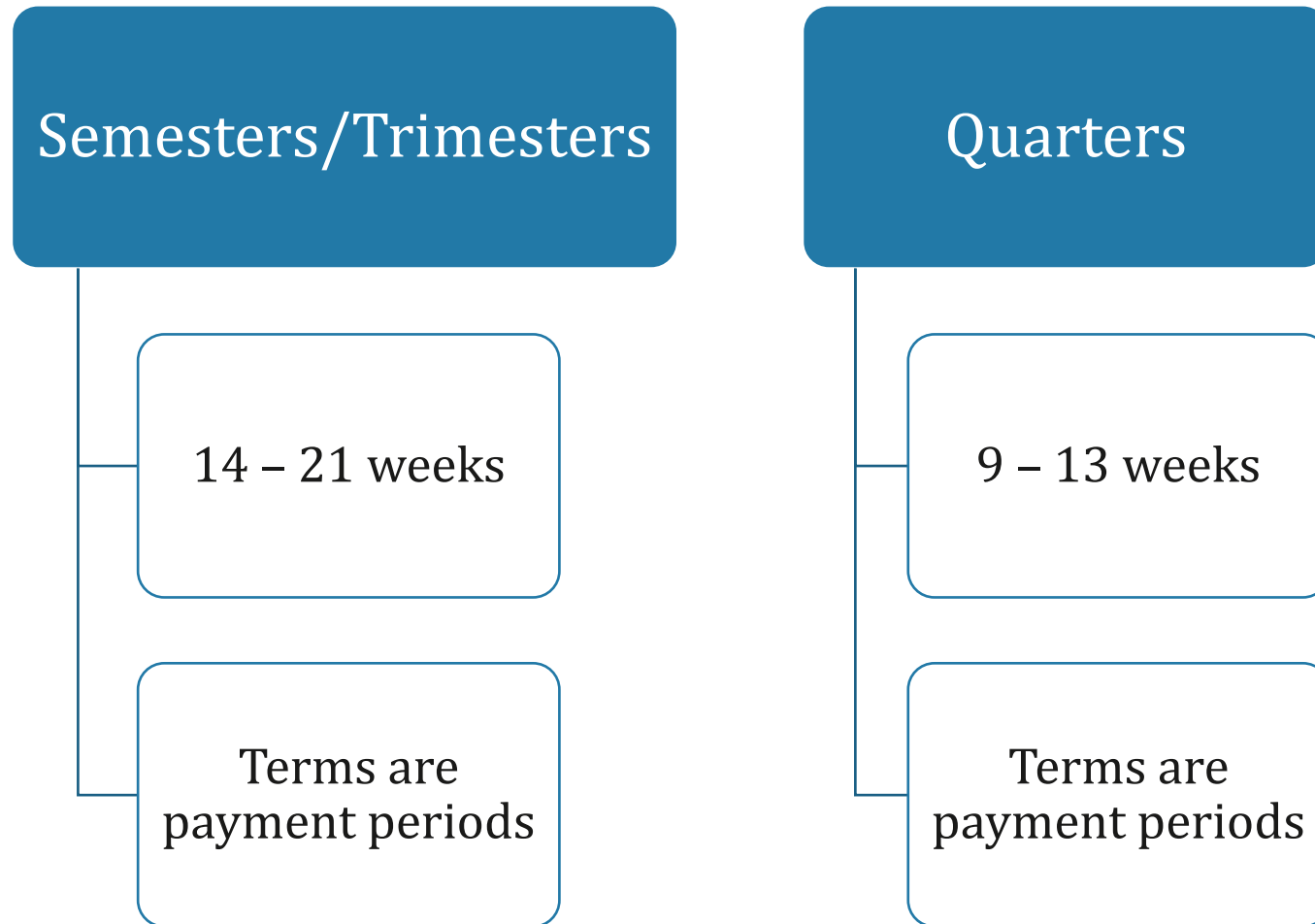
ACADEMIC TERMS AND *TITLE IV* ADMINISTRATION



DEFINITION OF A TERM

- A term is a period in which all classes are scheduled to begin and end within a set time frame and academic progress is measured in credit hours
 - Classes do not need to last the entire length of the term
 - Classes that do not last the entire length of the term are called modules for *Title IV* purposes
 - Terms can be standard or nonstandard
 - Clock hour programs cannot have terms for *Title IV* purposes even if the school's academic calendar has terms for academic purposes

STANDARD TERMS



For terms to remain standard, undergraduate full-time enrollment must be minimum of 12 credit hours in each term

STANDARD TERM CONSIDERATIONS

- Semester, trimester or quarter
 - May be offered traditionally
 - All courses begin at the start of the term and end at the last day of the term
 - May be offered nontraditionally
 - Courses offered consecutively/sequentially within the term
 - Compressed coursework (modules, mini-terms, etc.)
 - For Return to *Title IV* (R2T4) purposes, all courses that do not span entire length of the term are modules
- Terms that meet the definition of standard terms are not required to be substantially equal

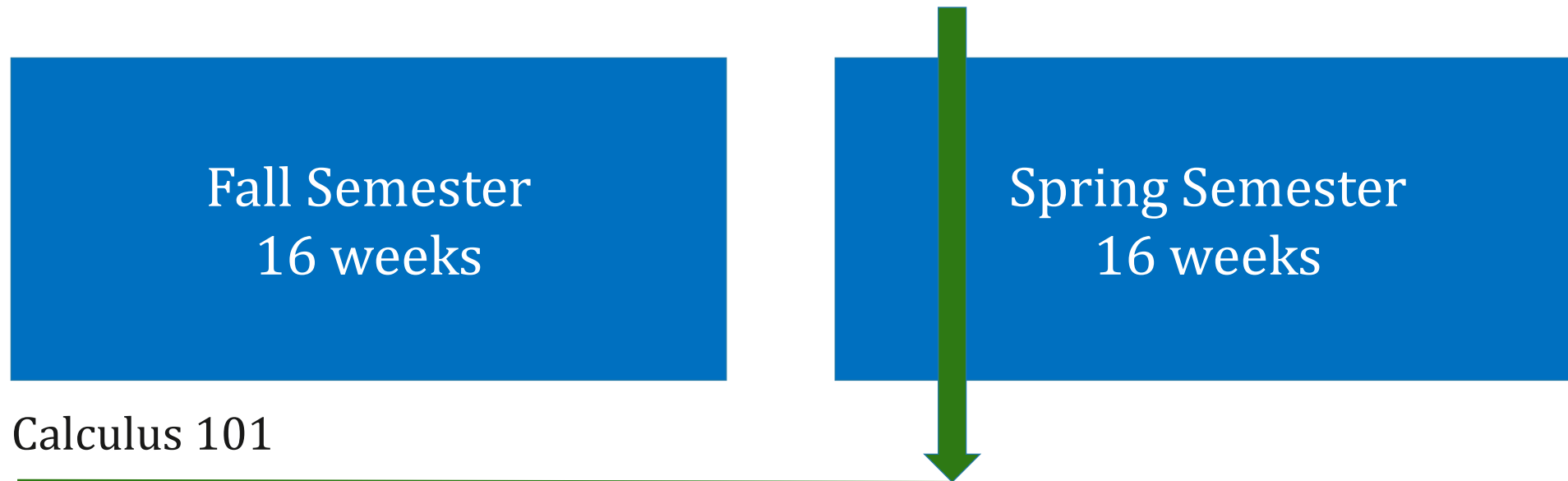
ADVANTAGES OF STANDARD TERMS

- Flexibility with Scheduled Academic Year (SAY) and Borrower Based Academic Year 1 (BBAY 1) means schools may use SAY or BBAY 1, or switch between them, as long as an overlap in academic years does not exist
- Treatment of summer terms
 - Summer can be treated as standard term (with conditions)
 - Full-time status must be defined as 12 semester, trimester, or quarter credit hours in the summer to be standard

STANDARD TERM LIMITATIONS

- If the course lasts beyond the maximum number of weeks for a standard term, then the term becomes nonstandard
 - Standard quarter – longer than 13 weeks
 - Standard semester – longer than 21 weeks
- If courses regularly extend beyond the normal term start or end dates, must revise official length of the term

STANDARD TERM LIMITATIONS (CONT.)



This means entire program becomes nonterm

STANDARD TERM OPTIONS

- An intersession or mini-term is a short session between standard terms which may overlap one but not both of the standard terms
- An intersession may be treated as a separate payment period, or attached to a standard term
 - If treated as a separate payment period, the short length of the term means that it is a nonstandard term and thus the entire program is nonstandard for *Title IV* purposes
- Schools must fund intersessions and summer terms

Fall Semester

Intersession

Spring Semester

STANDARD TERM OPTIONS (CONT.)

Programs with standard terms and intersessions can remain standard if the intersession is attached to a standard term. This does not make the longer standard term nonstandard.



NONSTANDARD TERMS

- Terms that do not meet the definition of a standard term are nonstandard
 - Nonstandard terms may be shorter or longer than standard terms
- Three types of nonstandard terms
 - Substantially equal (SE)
 - Substantially equal means no term is more than two weeks of instructional time longer than any other term in the program
 - Substantially equal and at least nine weeks (SE9W)
 - Not substantially equal (NSE)

NONSTANDARD TERM EXAMPLES

- Substantially equal
 - Four 8-week terms make up a 32-week academic year
- Substantially equal with at least 9 weeks
 - Three 10-week quarters where semester credits are awarded
 - Academic year is 30 weeks and 24 semester credit hours
- Not substantially equal
 - 13-week term and 17-week term make up a 30-week academic year

NONSTANDARD TERMS

- Can be due to awarding type of credit not usually associated with that type of term
 - Awarding quarter credits for 15-week semester, or awarding semester credits for 10-week quarter
- For most *Title IV* programs, nonstandard term is the payment period
 - Applies to substantially equal and SE9W terms
 - Exception for Direct Loans in programs with nonstandard terms are not substantially equal

PAYMENT PERIODS

- Payment period definitions vary according to the type of calendar structure in which the program is offered
- Payment period definitions are found in 34 C.F.R. § 668.4
 - Credit hour programs with standard terms and nonstandard terms that are substantially equal in length
 - Terms are the payment periods for all *Title IV* programs
 - Credit hour programs with nonstandard terms that are not substantially equal in length
 - The nonstandard terms are the payment periods for all program except Direct Loans
 - Direct Loan payment periods are defined as if the program was nonterm
 - All clock hour programs and credit hour programs without terms
 - The payment periods are defined based on the academic year definition and/or length of the program

NONSTANDARD TERM PAYMENT PERIODS

- A program with four 8-week terms in an academic year defined with 32 weeks of instructional time has substantially equal terms and the nonstandard term is the payment period for all *Title IV* programs
 - Must use BBAY 2 for Direct Loans
- A program with a 13-week semester and a 19-week semester in an academic year defined with 32 weeks of instructional time has a nonstandard term and a standard term and they are not substantially equal so terms are not the payment period for Direct Loan purposes, but they are for other *Title IV* programs
 - Each Direct Loan payment period consists of 16 weeks of instructional time and half the number of credits in the defined academic year
 - Must use BBAY 3 for Direct Loans

NONSTANDARD NOT SUBSTANTIALLY EQUAL TERM PAYMENT PERIODS

- For nonstandard not substantially equal terms Direct Loan payment periods are half of the number of weeks of instructional time and credit hours in the program or defined academic year using the same methodology as nonterm programs
 - Payment periods are the term for all other *Title IV* programs
- See 34 C.F.R. § 668.4(b)

NONTERM CALENDAR

- All clock hour programs are nonterm for *Title IV* purposes
- Credit hour programs may also be nonterm for *Title IV* purposes
 - Even if the school's academic calendar has terms, the structure of the terms may result in the Direct Loan program being administered as if there were no terms
 - In this circumstance, the terms are not the payment periods for Direct Loans, although the terms are the payment periods for all other *Title IV* programs
- If terms overlap, the program is considered nonterm for *Title IV* purposes

NONTERM PAYMENT PERIODS

- Payment periods are defined based on the weeks of instructional time in the academic year or program, whichever is shorter, and the number of clock or credit hours in the program or defined academic year
- The academic year or program is divided into two equal payment periods
 - Cannot have more than two payment periods in an academic year or program
 - A change in award year does not change the defined payment period

PELL GRANT FORMULA

- The Pell Grant formula used to award Pell Grant funds is determined by the program's academic calendar
 - Formulas 1 and 2 are for programs with standard terms in fall through spring and any summer term that defines full-time status as at least 12 credits
 - Formula 3 is for nonstandard term credit hour programs, or a program using standard terms
 - Formula 4 is for credit hour programs without terms and all clock hour programs

SUBSCRIPTION-BASED PROGRAM DEFINITION

- Defined in regulation 34 C.F.R. § 668.2
- Is a standard or nonstandard term program,
- Charges a student for each term on a subscription basis with the expectation that the student completes a specified number of credit hours (or equivalent) during that term,
- Does not require coursework to begin or end within established term dates, and
- Is associated with a single enrollment status (e.g., full time or half time) that applies to a student throughout the program.

SUBSCRIPTION-BASED PROGRAMS

- Subscription-based programs
 - Programs in which students are charged for a specific period of calendar time without reference to the specific courses or competencies that the student must complete during that timeframe
 - Many programs using subscription periods are “competency-based education (CBE) programs” however subscription-based programs are not synonymous with CBE programs even though many CBE programs are subscription-based
 - Programs with more traditional coursework could also be defined as subscription-based programs if they meet all the criteria in the regulatory definition
- Additional information from recorded webinar
 - <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2021-06-09/distance-education-and-innovation-regulatory-webinars-recordings-and-transcripts>

SUBSCRIPTION-BASED PROGRAMS (CONT.)

- Treatment of a program as subscription-based is strictly optional
- Subscription-based programs can always be offered using a nonterm academic calendar instead of a subscription-based calendar
- If a program used subscription pricing but requires coursework to start and end during established term dates, the program would be treated as a traditional term-based program

TYPES OF ACADEMIC YEARS FOR DIRECT LOANS



ACADEMIC CALENDARS AND DIRECT LOANS

- Academic year is the period of time to which annual loan limit applies to loans in the Direct Loan Program
 - Scheduled Academic Year (SAY) or Borrower-Based Academic Year (BBAY)
 - May or may not be same as the defined academic year for *Title IV* purposes
 - For example, if the defined academic year does not include an optional summer, the addition of summer to the loan period will result in a loan period longer than the defined academic year
 - In this circumstance, the academic year reported to the Department's Common Origination and Disbursement System (COD) should match the actual loan period

SCHEDULED ACADEMIC YEAR (SAY)

- Standard term programs may use SAY
 - EXCEPTION: nonstandard terms that are substantially equal and at least nine weeks (SE9W) may also use SAY
- School's schedule or calendar establishes "year" for Direct Loan
- SAY includes normal terms that are in the program's defined academic year and also accounts for summer term
 - Summer is categorized as header or trailer
 - Summer is often not part of the defined academic year
- An SAY must meet the regulatory requirements for an academic year

BORROWER-BASED ACADEMIC YEAR 1

- Borrower Based Academic Year 1 is for credit hour programs using scheduled academic year with standard terms or terms that are substantially equal and at least nine weeks (SE9W) terms
- Standard terms with a scheduled academic year may use BBAY 1
- May combine SAYs and BBAY 1s
- Nonstandard term programs with terms that are SE9W with a scheduled academic year may use BBAY 1

BORROWER BASED ACADEMIC YEAR 2

- BBAY 2 must be used for credit hour programs that do **not** have a scheduled academic year but are using standard terms or SE9W terms
 - Example – Program using 15-week semesters where cohorts of students begin the program and their 15-week semesters each month
- BBAY 2 must always include enough terms to meet minimum requirements for weeks of instructional time in the academic year
- When the calendar period associated with all the terms in BBAY 2 has elapsed a student regains eligibility for a new annual loan limit

BORROWER BASED ACADEMIC YEAR 3

- Nonterm credit and all clock hour programs must use BBAY 3
- Nonstandard term programs must use BBAY 3 if
 - Terms are not SE9W *or*
 - Standard terms and nonstandard terms are mixed in same program without an SAY
 - If this applies, terms are not the payment periods and students must successfully complete half the credits and half the weeks of instructional time in the academic year in order to receive a second disbursement
- BBAY 3 floats with the student's enrollment
 - Begins when student enrolls and ends when student has successfully completed the number of hours and weeks of instructional time in the academic year

NONSTANDARD SE9W TERMS

- May use SAY or BBAY 1 if program has a scheduled academic year
 - Student completes academic year when academic year scheduled to end or BBAY calendar time has elapsed (no requirement for successful completion of credit hours and weeks)
- If no scheduled academic year, must use BBAY 2
- Terms are the payment periods
- May use single-term loan period

NONSTANDARD SUBSTANTIALLY EQUAL TERMS

- For nonstandard substantially equal terms that are not at least nine weeks in length
- May not use single term loan period, unless term is final remaining period of program
- Must use BBAY 3
 - Student is eligible for another loan after **successfully completing** the weeks of instructional time and credit/clock hours in the defined academic year
- Terms are the payment periods

NONSTANDARD NOT SUBSTANTIALLY EQUAL TERMS

- Must use BBAY3
- For nonstandard terms that are not substantially equal
- May not use single term loan period, unless term is final remaining period of program
- Nonterm payment period rules apply
 - Student is eligible for second disbursement upon **successful completion** of half the credit/clock hours and weeks of instructional time in the loan period
- Student is eligible for another loan after **successfully completing** the weeks of instructional time and credit hours in the defined academic year

NONTERM DIRECT LOANS

- Must use BBAY 3
- Minimum loan period is lesser of –
 - BBAY
 - Length of program
 - Remaining period of program
- No single term loans because there are no terms for *Title IV* purposes

SPECIAL CIRCUMSTANCES



CLINICAL WORK AND STANDARD TERMS

- The clinical component of some programs may not coincide with the school's standard terms
 - Usually due to clinical work having a different calendar controlled by another entity
- Standard term calendar used until student progresses to part of program involving work outside classroom but still part of program
- Guidance applies to
 - Medically related fields
 - Programs preparing educators

CLINICAL WORK AND STANDARD TERMS

Schools may allow clinical work to be treated as standard term, if **ALL** of the following apply:

1. All students in the program must participate in practicum or clinical experience and its completion is requirement for graduates to apply for licensure or authorization to practice the occupation those students intend to pursue.
2. School has little or no control over length or start/end dates of practicum or clinical experience. This may be a result of constraints imposed by outside licensing bodies, or need to accommodate schedules of entities with which students are being placed (e.g., school districts and hospitals)
3. Credit hours associated with practicum or clinical experience must be associated with the term in which most training occurs, even if start and end dates do not exactly align with the term dates and/or overlap with another term

CLINICAL WORK AND STANDARD TERMS

- If clinical work meets all three requirements on the previous slide, it will not create
 - Nonstandard terms
 - Nonterm calendar even if clinical work is overlapping another term
- Policies and Procedures must explain how this aspect of administration is being handled by school
- Academic year and loan period must be determined using actual training dates and use cost of attendance and estimated family contribution for actual training period
- Return calculations are based on actual training dates of the payment period

CONSORTIUM AGREEMENTS

- Program's academic year is not affected if coursework taken at host school overlaps or does not take place in same time frame as home school's normal terms
- School that awards *Title IV* aid should do so based on its own academic calendar
- Earliest disbursement date is 10 days prior to the start date of the term at either home or host school

QUESTIONS?

<https://fsapartners.ed.gov/help-center/contact-customer-support>

SCHOOL ELIGIBILITY AND OVERSIGHT SERVICES GROUP (SEOSG)

Martina Fernandez-Rosario – Director, School Eligibility and Oversight Services Group

415-486-5605

School Eligibility and Oversight Services Group General Number: 202-377-3173 or email: CaseTeams@ed.gov

Or call/email the appropriate School Participation Division team below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, and school closure information.

New York/Boston School Participation Division

Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, New Jersey, New York, Puerto Rico, Virgin Islands

E-mail Mailbox: NYBostonSPD@ed.gov

Vanessa Dillard – Division Chief 404-974-9297

Jennifer Uhler – Branch Chief 617-289-0121

Teresa Martinez – Branch Chief 646-428-3748

Philadelphia School Participation Division

District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia, Michigan

E-mail Mailbox: PhiladelphiaSPD@ed.gov

Nancy Gifford, Division Chief 215-656-6436

Sherrie Bell - Branch Chief 202-377-3349

Manuel Loera – Branch Chief 215-656-8503

Bronsdon Thompson – Branch Chief 202-377-3747

Multi-Regional and Foreign School Participation Division

E-mail Mailbox: Multi-RegionalSPD@ed.gov

FSA.Foreign.Schools.Team@ed.gov

Michael Frola, Division Chief 202-377-3364

Mark Buszkohl – Branch Chief 202-377-4572

Michelle Allred – Branch Chief 214-661-9466

David Garza – Branch Chief 214-661-9694

Margery Harvey – Branch Chief 312-730-1696

Atlanta School Participation and Financial Analysis Division

Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina

E-mail Mailbox: AtlantaSPD@ed.gov

Christopher Miller, Division Chief 404-974-9297

Vinita Simpson – Branch Chief 404-974-9260

Rhonda Puffer – Branch Chief 816-268-0547

Tana Lyon – Branch Chief 202-987-1352

Dallas School Participation Division

Arkansas, Louisiana, New Mexico, Oklahoma, Texas

E-mail Mailbox: DallasSPD@ed.gov

Cynthia Thornton, Division Chief 214-661-9457

Jesus Moya – Branch Chief 214-661-9472

Kim Peeler – Branch Chief 214-661-9471

Kansas City School Participation and Third-Party Services Division

Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee

E-mail Mailbox: KansascitySPD@ed.gov

FSAPC3rdpartyserviceroversight@ed.gov

Dvak Corwin, Division Chief 816-268-0420

Angie Beam – Branch Chief 816-268-0534

Kathy Feith – Branch Chief 816-268-0406

Chicago/Denver School Participation Division

Illinois, Minnesota, Ohio, Wisconsin, Indiana, Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

E-mail Mailbox: Chicago.Denver.SPD@ed.gov

Jeremy Early, Division Chief 312-730-1529

Jason Charlton – Branch Chief 312-730-1695

Tammi Sawyer – Branch Chief 312-730-1531

San Francisco/Seattle School Participation Division

American Samoa, Arizona, California, Guam, Hawaii, Nevada, Palau, Marshall Islands, North Marianas, State of Micronesia, Alaska, Idaho, Oregon, Washington

E-mail Mailbox: SANFRANCISCO.SEATTLE.SPD@ed.gov

Martina Fernandez-Rosario, Division Chief 415-486-5605

Erik Fosker – Branch Chief 415-486-5606

Kim Meadows – Branch Chief 202-377-3058

Marisol Mendoza – Branch Chief 415-486-5506