SESSION FOREIGN SCHOOLS #1

Academic Calendars for Foreign Schools

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2020 Virtual FSA Training Conference for Financial Aid Professionals
AGENDA

- Academic Calendars and Academic Years
- Academic Terms and Title IV
- William D. Ford Federal Direct Loan (Direct Loan) Program Reconciliation
- Special Circumstances
ACADEMIC CALENDARS AND ACADEMIC YEARS
YOUR ACADEMIC CALENDAR AND TITLE IV

- Determine how the structure of your programs’ academic calendars impacts Title IV administration
- Questions to ask
  - Does the program have terms?
  - Do the terms overlap?
  - Are the terms standard?
ACADEMIC CALENDARS

- Three types of academic calendars
  - Standard term
  - Nonstandard term
  - Nonterm
    - Credit hour
    - Clock hour
Every eligible program must have a defined academic year for Title IV purposes

- Used to determine student eligibility
- Must be defined in writing in policies and procedures
- Specify weeks of instructional time and credit or clock hours
- Not connected to award year
- Must be same definition for entire length of program

Regulations define minimum requirements
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
  • 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
## UNDERGRADUATE ACADEMIC YEAR MINIMUMS

<table>
<thead>
<tr>
<th>Programs that measure progress</th>
<th>Minimum number of weeks of instruction</th>
<th>Minimum number of credit/clock hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>progress in semester or trimester credit hours</td>
<td>30</td>
<td>24</td>
</tr>
<tr>
<td>progress in quarter credit hours</td>
<td>30</td>
<td>36</td>
</tr>
<tr>
<td>progress in clock hours</td>
<td>26</td>
<td>900</td>
</tr>
</tbody>
</table>

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
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
STANDARD TERMS

Semesters/Trimesters
- 14 – 21 weeks
- Terms are payment periods

Quarters
- 9 – 13 weeks
- Terms are payment periods

For terms to remain standard, undergraduate full-time enrollment must be minimum of 12 credit hours
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
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 or quarter hours in the summer to be standard.
STANDARD TERM LIMITATIONS

• Consider a class in an academic program that may begin before established start of standard term and/or finish after established end of standard term
  • 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

Fall Semester
16 weeks

Spring Semester
16 weeks

The overlap of terms means entire program becomes nonterm
STANDARD TERM LIMITATIONS

Fall Semester
16 weeks

Spring Semester
16 weeks

Math 101

This means entire program becomes nonterm
STANDARD TERM OPTIONS

• An intersession or mini-term is a short session between 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
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)
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 payment periods
• If terms overlap, the program is considered nonterm for Title IV purposes
NONTERM CALENDAR

- Defined academic year has two **EQUALLY** important components
  - Weeks of instructional time
  - Hours (credit or clock)
- Payment periods for nonterm calendars are based on the weeks of instructional time and credit/clock hours in the program or academic year
- Statute establishes minimum
- School defines its academic year for each program of study
  - Must meet minimum requirements
  - The defined academic year can be longer than the minimum required
NONTERM PAYMENT PERIODS

• No terms to use for payment periods
• Student’s successful completion of weeks of instruction and credit or clock hours determine the student’s payment periods
• For graduate or professional students, the Direct Loan payment period is half of what a full-time student would be expected to complete, in both weeks of instructional time and credit or clock hours
• See 34 C.F.R. § 668.4(c)
NONTERM PAYMENT PERIOD EXAMPLE

 Defined AY*  

 Program Length

 48 Weeks and 24 Credit Hours

 96 Weeks and 48 Credit Hours

 24 Weeks and 12 Credit Hours

 Payment Period 1

 24 Weeks and 12 Credit Hours

 Payment period 2

AY = Academic Year
There are four payment periods in this program
DIRECT LOAN ADMINISTRATION
• 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 AY 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 COD should match the actual loan period
SCHEDULED ACADEMIC YEAR

- 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
BORROWER-BASED ACADEMIC YEAR 1

- Borrower Based Academic Year 1 is for credit hour programs using scheduled academic year with standard terms or 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 substantially equal and at least nine weeks (SE9W) with a scheduled academic year may use BBAY 1
BBAY 2 AND BBAY 3

- 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
- Nonterm credit and 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 a SAY
NONSTANDARD TERM SE9W TERMS

- May use single-term loan period
- 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
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

- 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 periods apply
  - Student is eligible for second disbursement upon *successful completion* of half the credit/clock hours and weeks of instructional time in loan period
- Student is eligible for another loan after *successfully completing* the weeks of instructional time and credit/clock 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
GRADE LEVEL PROGRESSION

• Schools can develop their own grade level standards but at minimum must equal the minimum academic year definition
  • For example, a student might have to earn 30 credits to be a sophomore for grade-level purposes, but she could be eligible for a new loan at grade level one after earning 24 credits, if that is the defined academic year
  • Students in standard term and some nonstandard term programs who advance to a higher grade within the academic year can receive additional funds
SPECIAL CIRCUMSTANCES
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
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 school
- Academic year and loan period for Direct Loan should be determined using actual training dates and loan should reflect cost of attendance and estimated family contribution for actual training period
- R2T4 calculations are based on payment period or period of enrollment that reflects actual training dates
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
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Or call/email the appropriate School Participation Division below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, and school closure information.

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