

2007-2008 Volume 3
Calculating Awards and Packaging
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Academic Calendar & Payment Periods

Award limits are generally connected to a period of time. For instance, all of the programs except Federal Work-Study have a maximum amount that can be awarded for an academic year or award year. Measurement of time is important for another reason. In most cases, awards from the Federal Student Aid (FSA) programs must be paid in at least two installments. For most programs, the amount and timing of the payments is based on the academic terms or payment periods in the program.

ACADEMIC YEAR REQUIREMENTS

Every eligible program, including graduate programs, must have a defined academic year. The academic year is used to determine the student's eligibility for loans, Pell Grants, as well as ACG and National SMART grants. The student's academic year status determines, in part, whether they are eligible for first or second-year ACG awards, or a third or fourth year National SMART grant.

A school may have different academic years for different programs. For example, a school may choose to define the academic year for a term-based program differently from a nonterm program. In some cases the definition *must* be different, such as in the case of a clock-hour program and a credit-hour program. For FSA purposes, the academic year is defined in weeks of instructional time and for undergraduate programs in credit or clock hours. The program's academic year need not coincide with a program's academic calendar.

A school may treat two versions of the same academic program (day and night, for example) as separate programs and define different academic years for each version. If your school establishes separate versions of a program, with different academic years, but allows individual students to take courses from both versions, your school must be able to demonstrate which program the student is actually enrolled in. Generally, to be considered enrolled in a particular program or version of a program, a student must be taking at least 50% of his or her coursework in that program.

A school may have different academic years for different programs, but must use the same academic year definition for **all** FSA awards for students enrolled in a particular program, and for all other FSA program purposes.

CHAPTER 1 HIGHLIGHTS:

Undergraduate Programs and Academic year minimums
 → 30 weeks of instructional time for credit-hour and direct assessment programs, 26 weeks for clock-hour programs
 → 24 semester credits or 36 quarter credits; or 900 clock hours

Academic calendars
 → Standard term (semester, quarter, or trimester)
 → "Nonstandard" term
 → Nonterm

Types of Payment Periods
 → Standard and nonstandard term-based credit-hour programs
 → Nonterm credit-hour programs
 → Clock-hour programs (always nonterm)

Related topics
 → Completion requirements for nonterm programs—see Volume 4, Chapter 1.
 → Timing of Stafford disbursements for nonterm programs and programs with nonstandard terms of unequal length—see Volume 4, Chapter 1.
 → See Volume 5 for discussion of payment periods if student reenters a program after withdrawing.

FSA Assessments

FSA has developed Assessment modules to assist you to 1) Anticipate and address problems, 2) Spot-check the systems for managing information, 3) Prepare for an audit or other review, and 4) Maximize the efficiency of your staff. There are several FSA Assessment modules that will aid you in understanding program requirements and your compliance with FSA program provisions.

The FSA Assessments that are relevant for this Volume can be found at:

FSA Assessment: Fiscal Management (All Programs) <http://ifap.ed.gov/qahome/qaassessments/fiscalmanagement.html>

Citations

Award Year: 34 CFR 600.2

Academic Year: 34 CFR 668.3

Payment Period: 34 CFR 668.4

Weeks of instructional time: 34 CFR 668.3(b)

Weeks of instructional time are used in the Pell and Stafford calculations (chapters 3 and 5 of this Volume).

Note that the Department has not set a regulatory standard for the number of hours of instructional time that make up one day of instruction. This has been left to the reasonable interpretation of schools and their accrediting agencies.

Reductions in academic year length

The law permits schools that provide two-year or four-year associate or baccalaureate degree programs to apply to the Department if they want to establish a full academic year of less than 30 weeks of instructional time. The Department is permitted to grant a reduction in the length of an academic year to no less than 26 weeks of instructional time.

For further details on the information required for submission of such a request, see 34 CFR 668.3 (c).

Weeks of instructional time in an academic year

An academic year for a credit-hour or direct assessment program must be at least 30 weeks of instructional time for a year, and for clock hour programs, 26 weeks of instructional time. In cases where the program uses an academic year that meets the standard for credit hours or clock hours, but the program provides less than the required weeks of actual instructional time, Pell Grant awards and, in some cases, the annual loan limits for Stafford Loans must be prorated.

The number of *weeks of instructional time* are based on the period that begins on the first day of classes in the academic year and ends on the last day of classes or examinations. For all FSA programs, a *week of instructional time* is any period of seven consecutive days in which at least one day of regularly scheduled instruction, examination, or (after the last day of classes) at least one scheduled day of study for examinations occurs. Instructional time does not include periods of orientation, counseling, homework, vacation, or other activity not related to class preparation or examination. Therefore, the weeks of instructional time may be less than the number of calendar weeks that elapse between the first day of classes and the last day of classes or examinations.

Credit/clock hours in an academic year

The law and regulations set the following minimum standards for coursework earned by a full-time student in an academic year in an *undergraduate* educational program (including direct assessment programs):

- 24 semester or trimester credit hours or 36 quarter credit hours for a program measured in credit hours; or
- 900 clock hours for a program measured in clock hours

There is no minimum hours component to the definition of an academic year for *graduate/professional* programs. For purposes of FFEL and DL programs, a loan period certified for an academic year in a graduate or professional program would include the weeks of instructional time in the academic year and the hours a full-time student is expected to complete in those weeks. See Chapter 4 for more details on monitoring annual loan limits.

Counting weeks of instructional time

This graphic illustrates how you would count weeks of instructional time in a program where classes are held Monday through Friday. In our hypothetical year, August 1st is a Sunday, and classes begin on August 23rd and end December 3rd, with examinations held December 6th-10th. Note that the school holds no classes on Labor Day (September 6th) on this calendar, Veterans Day (November 12th), and Thanksgiving break (November 24th-26th). The circles indicate the points at which each of the 15 weeks of instructional time are completed.

August							September							October							November							December						
1	2	3	4	5	6	7				1	2	3	4				1	2	1	2	3	4	5	6				1	2	3	4			
8	9	10	11	12	13	14	5	6	7	8	9	10	11	3	4	5	6	7	8	9	7	8	9	10	11	12	13	5	6	7	8	9	10	11
15	16	17	18	19	20	21	12	13	14	15	16	17	18	10	11	12	13	14	15	16	14	15	16	17	18	19	20	12	13	14	15	16	17	18
22	23	24	25	26	27	28	19	20	21	22	23	24	25	17	18	19	20	21	22	23	21	22	23	24	25	26	27	19	20	21	22	23	24	25
29	30	31					26	27	28	29	30			24	25	26	27	28	29	30	28	29	30					26	27	28	29	30	31	
														31																				

ACADEMIC CALENDARS & TERMS

Schools offer programs with many kinds of academic calendars that differ from the traditional Fall-Spring school year. For purposes of the FSA programs, there are three basic types of academic calendars: standard term, nonstandard term, and nonterm.

Generally, a term is a period in which all classes are scheduled to begin and end within a set time frame. However, if these periods overlap within a program, they may not be treated as a term-based program for Title IV purposes. Term-based programs can have either standard terms or nonstandard terms.

Standard terms: semesters, trimesters, and quarters

Semesters and trimesters are terms that are generally 14 to 17 weeks long. An academic calendar that uses semesters traditionally has two terms, in the fall and spring, and a trimester academic calendar traditionally has three terms, in the fall, spring, and summer. Academic progress is measured in semester credit hours, and full time is at least 12 semester credits.

Similarly, quarter terms are approximately 10 to 12 weeks in length and the academic calendar includes three quarters in the fall, winter, spring, and often a summer term. Academic progress is measured in quarter credit hours, and full time is at least 12 quarter credits.

You may combine shorter terms or modules to meet the requirements of a standard term such as a semester. For example: a program is offered in 8 nonstandard terms, each 6 weeks in length, and students earn 6 quarter credits in each term. The school may choose to combine each consecutive pair of nonstandard terms and consider the program to be offered in 4 quarters.

In certain limited cases for academic programs offered basically in standard terms, a short nonstandard term may be treated as part of one of the standard terms, and the combined terms may be considered to be a single standard term. For example, a program is offered in a calendar consisting of two 15-week semesters and a 4-week intersession. To consider the program as consisting only of semesters, the intersession may be treated as part of one of the two semesters as long as the same treatment is applied for all Title IV purposes to all students enrolled in the program. In addition, hours taken in the intersession must count towards a student's enrollment status for the combined term and costs for the intersession must be appropriately included in the cost of attendance.

Credits and nonstandard terms

Nonstandard terms are terms (where all coursework is expected to begin and end within a set period of time) that are not semester, trimester, or quarter terms. In some cases, the terms may be of unequal length, though it is also possible for terms of equal length to be considered nonstandard. For instance, a school could offer

Typical length of standard terms

For additional information on this topic, this issue was addressed in the preamble to the General Provisions regulations published on November 29, 1996 (Federal Register, Volume 61, No. 231, Page 60581).

Credits and nonstandard terms

Remember, just because progress in a program is measured in semester or quarter credits, this does not necessarily mean that the program is offered in semester or quarter terms. Also, even though a school may label a term as a quarter, semester, or trimester it may be considered a nonstandard term for Federal Student Aid purposes if it does not conform to the Federal Student Aid standards for a semester, trimester, or quarter.

Combining terms examples

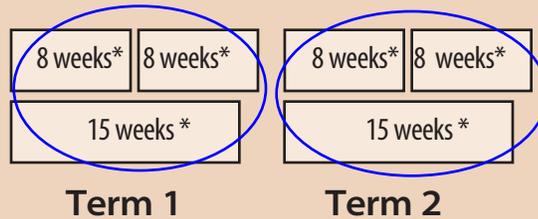
See the example on the next page for guidance on combining concurrent and consecutive terms.

a program with six consecutive 5-week modules, with each module counting as a nonstandard term.

Unlike standard terms, the length of the term is not necessarily associated with the type of credit hours awarded. Some nonstandard terms are the length of a semester (14-17 weeks) but award quarter credits. Others are the length of a quarter (10-12 weeks) but award semester credits.

Combining concurrent terms

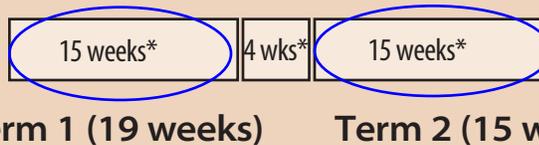
Clark University offers a program in both 15-week terms and 8-week terms. Clark University combined two 8-week terms with a 15-week term to make each semester; each semester provides 16 weeks of instructional time*.



Combining consecutive terms

Lewis College offers a separate degree program in education with a short 4-week* term between two 15-week* semesters. The terms don't overlap.

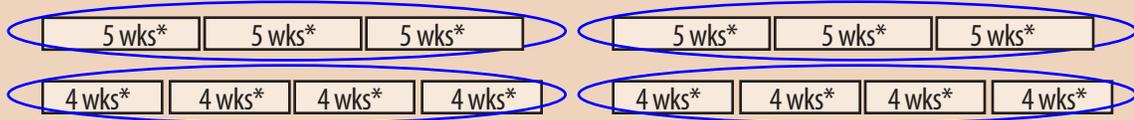
Lewis College has defined the academic year for this program as 24 semester hours and 34 weeks of instructional time. Lewis College could combine the short term with one of the standard terms and for purposes of FSA programs treat the program as being offered in two semesters:



Lewis College can also choose not to combine the terms. In this case, the program would have a 4-week term and two semesters. For certain Title IV program requirements, this may mean you will treat all terms in a nonstandard manner. For more details on nonstandard terms, see p. 3-3.

Treatment of modules

A school may choose to group modules together and treat the entire period as a term. (For example, grouping three five-week* modules together may create a 15-week* semester; or grouping four one-month modules into a 16-week semester would be acceptable.)



On the other hand, programs that are offered in modules may sometimes be counted as programs measured in nonstandard terms. For example, in a program that offers six 5-week modules, each module could be treated as a nonstandard term. In addition, a school may choose to consider a program that consists of consecutive modules as a nonterm program. Whatever academic calendar your school adopts for a program, you must apply it to all students enrolled in that program and document the program's treatment in your policies and procedures manual.

*Weeks in these examples are weeks of instructional time, as defined earlier in this chapter

Nonterm characteristics

If a program measures progress in clock hours, it is always treated as a nonterm program. A program that measures progress in credit hours is considered to be using a nonterm calendar if it has:

- courses that do not begin and end within a set period of time,
- courses that overlap terms,
- self-paced and independent study courses that overlap terms, or
- sequential courses that do not begin and end within a term.

DEFINITION OF A PAYMENT PERIOD

The definition of a payment period is applicable to all FSA programs except FWS. The common definition is integral to requirements for the administration of FSA program funds. For example, FSA program disbursements (except FWS payments) generally must be made on a payment period basis (for more information, see Volume 4 – Processing Aid and Managing FSA Funds). Note that FFEL and Direct Loan disbursements must still be made in accordance with the specific disbursement rules for those programs (see sidebar).

Under the payment period definition, there are three sets of requirements: one for term-based credit hour programs, one for nonterm credit-hour programs, and one for clock-hour programs.

Payment period cites

- Definition of payment periods: 34 CFR 668.4
- Disburse FSA funds by payment periods
34 CFR 668.164(b)
 - Pell disbursements by payment period:
34 CFR 690.63
 - Perkins disbursements by payment period:
34 CFR 674.16(b)
 - FSEOG disbursements by payment period:
34 CFR 676.16(a)
 - ACG/National SMART disbursements by payment period:
34 CFR 691.63
 - Direct Assessment payment period:
34 CFR 668.10(a)(3)
 - Disbursing Stafford/PLUS funds by payment period/
completion of coursework and calendar midpoint:
FFEL: 34 CFR 682.604(c)(6),(7), and (8)
DL: 34 CFR 685.301(b)

TERM-BASED CREDIT HOUR PROGRAMS

Program offered in...	Payment Period is...
• semester terms	• semester
• trimester terms	• trimester
• quarter terms	• quarter
• nonstandard terms	• nonstandard term

Payment periods for nonterm credit-hour programs

Payment periods for programs measured in credit hours without terms vary depending on whether the length of the program in credit hours and weeks of instructional time is:

- one academic year or less
- a multiple of a full academic year
- longer than an academic year with a remainder shorter than or equal to one half of an academic year; or
- longer than an academic year with a remainder shorter than an academic year, but longer than one-half of an academic year.

If you are determining the payment periods for a program for which one of the measures (either credit hours or length of instructional time) is less than an academic year and the other measurement is not, you follow the payment period rules for a program that is less than an academic year.

For all nonterm credit-hour programs, a student must successfully complete both the weeks of instructional time and the credits in a payment period in order to progress to the next period (and be eligible for additional Title IV funds).

If your school is unable to determine when a student has successfully completed half of the credit hours in a program in an academic year, or in the remainder of a program because no credits are awarded until the end of the program, the student is considered to have begun the second payment period of the program, academic year, or remainder of a program at the later of:

- The date the school identifies as the point when the student has successfully completed half of the academic coursework in the program, academic year, or the remainder of the program; or
- The calendar midpoint between the first and last scheduled days of class of the program, academic year, or the remainder of the program.

Payment period for nonterm credit-hour programs where the program is one academic year or less

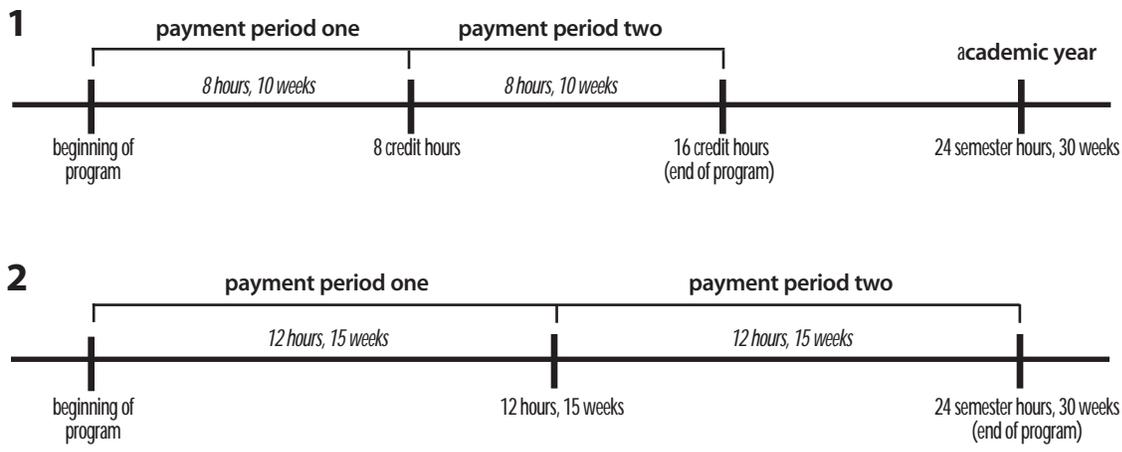
For a student enrolled in an eligible program that is one academic year or less in length, the first payment period is the period of time in which the student successfully completes half the number of credit hours in the program and half the number of weeks of instructional time in the program. The second payment period is the period of time in which the student successfully completes the remainder of the program in both credit hours and weeks of instructional time.

For example, if a program is 16 semester hours and 20 weeks of instructional time, and the academic year is defined as 24 semester hours and 30 weeks of instruction, the first payment period is the period of time needed for the student to successfully complete the first 8 semester hours and 10 weeks of instruction. The second payment period would be the period of time needed for the student to successfully complete the last 8 semester hours and 10 weeks of instruction (see the example that follows). If the program were equal to the academic year (24 semester hours and 30 weeks of instruction), the first payment period would be the period of time needed for the student to successfully complete the first 12 semester hours and 15 weeks of instruction. The second payment period would be the period of time needed for the student to successfully complete the second 12 semester hours and 15 weeks of instruction.

Note: For a program to be considered an academic year in length, both the credit hours and weeks of instructional time must at least meet the program’s defined academic year.

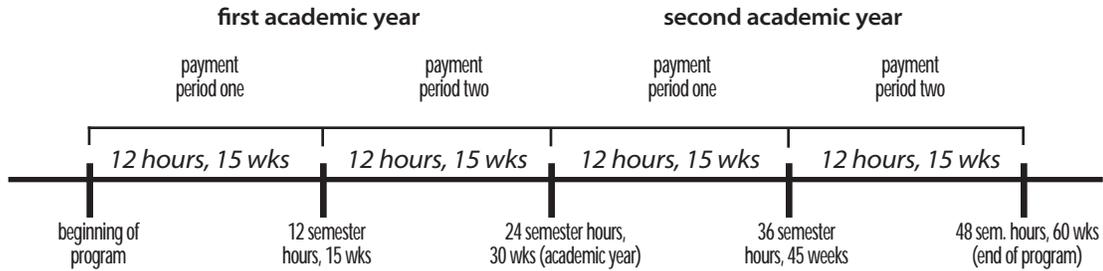
Payment periods for nonterm credit-hour programs that are two or more academic years

One Academic Year or Less Examples



If the program is equal to two or more complete academic years, for the first academic year and any subsequent full academic year, the first payment period is the period of time in which the student successfully completes half the number of credit hours in the academic year and half the number of weeks of instructional time in the academic year. The second payment period is the period of time in which the student successfully completes the academic year in both credit hours and weeks of instructional time.

Multiple Academic Years Example

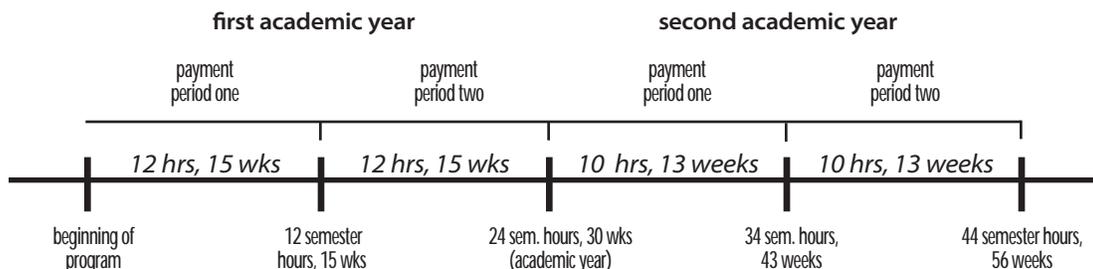


Payment periods for nonterm credit-hour programs that are longer than an academic year with a remaining portion

If the program is longer than an academic year, but has a remaining portion that is not equal to an academic year, in either credit hours or weeks of instructional time or both for the first academic year, the first payment period is the period of time in which the student successfully completes half the number of credit hours in the academic year and half the number of weeks of instructional time in the academic year. The second payment period is the period of time in which the student successfully completes the remainder of the academic year in both credit hours and weeks of instructional time.

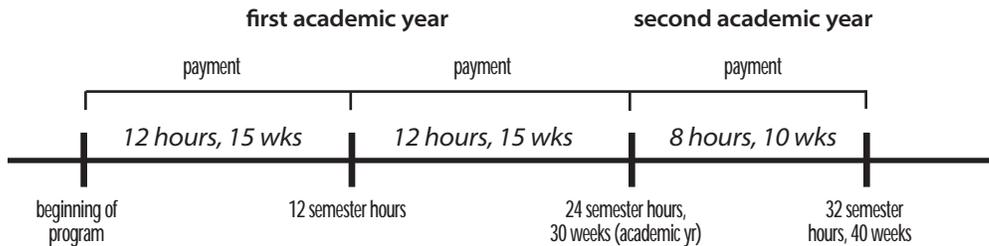
For any remaining portion of an eligible program that is more than one-half an academic year in both weeks of instruction and credit hours but less than a full academic year in length by at least one of these measures, the first payment period is the period of time in which the student successfully completes half the number of credit hours in the remaining portion of the program and half the number of weeks of instructional time remaining in the program. The second payment period is the period of time in which the student successfully completes the remainder of the program in both credit hours and weeks of instructional time.

Remainder Greater Than Half an Academic Year Example



For any remaining portion of an eligible program that is not more than half an academic year in both weeks of instruction and credit hours, the payment period is the remainder of the program. That is, if one measure is less than or equal to half an academic year, there is only one payment period in the remaining portion.

Remainder Equal To or Shorter Than Half an Academic Year Example



Payment periods for programs that measure progress in clock hours

Payment periods for programs measured in clock hours vary depending on whether the length of the program in clock hours is:

- one academic year or less
- a multiple of a full academic year
- longer than an academic year with a remainder shorter than or equal to one half of an academic year or
- longer than an academic year with a remainder shorter than an academic year, but longer than one half of an academic year.

For all nonterm clock-hour programs, a student must successfully complete the clock hours in a payment period in order to progress to the next period (and be eligible for additional Title IV funds).

Payment period for clock-hour programs of an academic year or less

If the program is an academic year or less in length, the first payment period is the period of time in which the student successfully completes the first half of the program, as measured in clock hours. The second payment period is the period of time in which the student successfully completes the second half of the program, as measured in clock hours.

Payment Period for Clock Hour Programs of One Academic Year or Less

First payment period

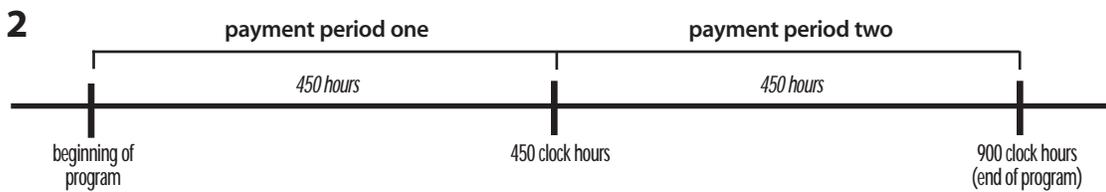
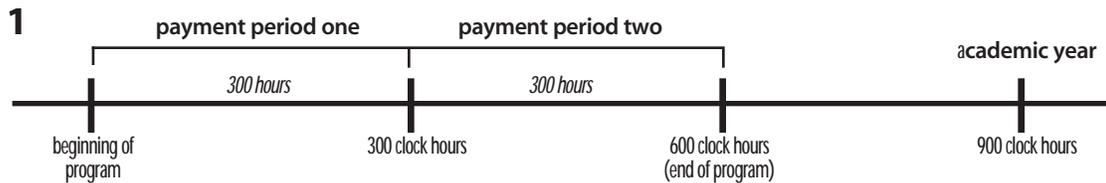
- period in which a student successfully completes first half of the program, as measured in clock hours

Second payment period

- period in which a student successfully completes remainder of the program, as measured in clock hours

For example, if a program is 600 clock hours and the clock-hour component of the academic year is defined as 900 clock hours, the first payment period is the period of time needed for the student to successfully complete the first 300 clock hours. The second payment period would be the period of time needed for the student to successfully complete the last 300 clock hours (see example 1 below). If the program were equal to the academic year (900 clock hours), the first payment period would be the period of time needed for the student to successfully complete the first 450 clock hours. The second payment period would be the period of time needed for the student to successfully complete the second 450 clock hours (see example 2 below).

One Academic Year or Less Examples

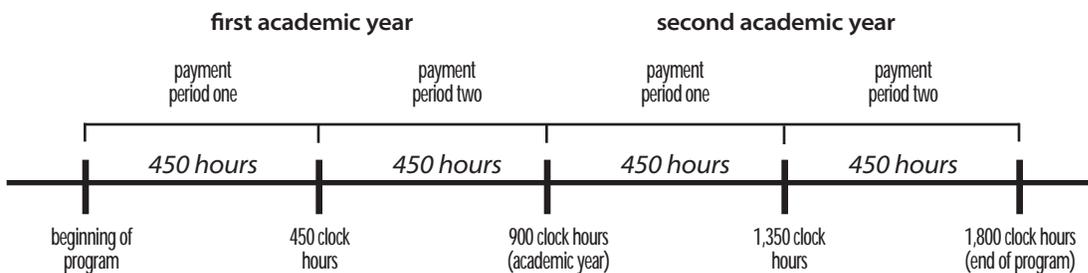


Payment period for clock-hour programs with two or more academic years

If the program is equal to two or more complete academic years, for the first academic year and any subsequent full academic year, the first payment period is the period of time in which the student successfully completes the first half of the academic year, as measured in clock hours. The second payment period is the period of time in which the student successfully completes the second half of the academic year as measured in clock hours.

For example, if a program is 1,800 clock hours and the clock-hour component of the academic year is defined, in part, as 900 clock hours, the first payment period for both the first and any subsequent academic year is the period of time needed for the student to successfully complete the first 450 clock hours. The second payment period would be the period of time needed for the student to successfully complete the next 450 clock hours.

Multiple Academic Years Example



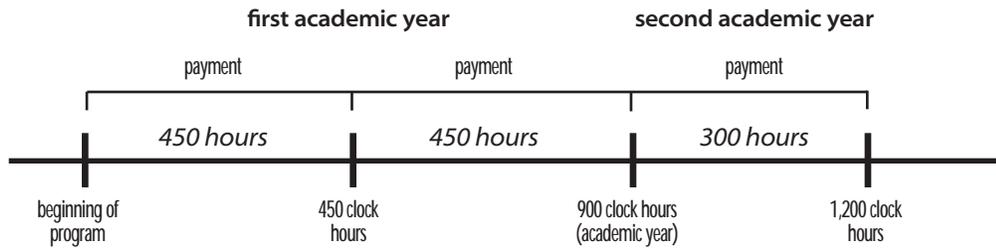
Payment period for clock-hour programs longer than an academic year with a remaining portion

If the program is longer than an academic year, but has a remaining portion of the program that is not equal to an academic year (in clock hours), for the first academic year, and any subsequent full academic year, the first payment period is the period of time in which the student successfully completes the first half of the academic year. The second payment period is the period of time in which the student successfully completes the second half of the academic year.

For the remaining portion of the program, if the remainder is equal to or shorter than one half of an academic year (in clock hours), the payment period is the remaining portion of the program.

For example, if a program is 1,200 clock hours and the clock-hour component of the academic year is defined, in part, as 900 clock hours, the first payment period for the first academic year is the period of time needed for the student to successfully complete the first 450 clock hours. The second payment period is the period of time needed for the student to successfully complete the next 450 clock hours. The first, and only, payment period for the second academic year is equal to the remaining portion of the program (300 clock hours).

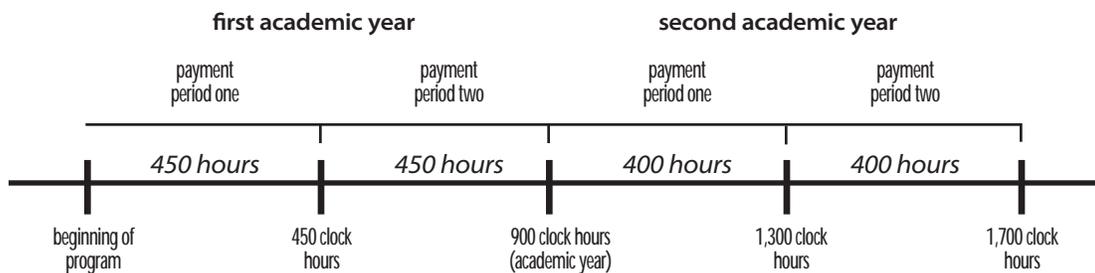
Remainder Equal To or Shorter Than Half an Academic Year Example



If the remaining portion of the program is more than one-half of an academic year but less than a full academic year, in clock hours, for the remaining portion of the program the first payment period is the period of time in which the student successfully completes the first half of the remaining portion of the program, as measured in clock hours. The second payment period is the period of time in which the student successfully completes the second half of the remaining portion of the program as measured in clock hours.

For example, if a program is 1,700 clock hours and the clock-hour component of the academic year is defined, in part, as 900 clock hours, the first payment period for the first academic year is the period of time needed for the student to successfully complete the first 450 clock hours. The second payment period would be the period of time needed for the student to successfully complete the next 450 clock hours. Because the remaining portion is 800 clock hours, the first payment period for the second academic year would be the period of time needed for the student to successfully complete the next 400 clock hours. The second payment period for the second academic year would be the period of time needed for the student to successfully complete the final 400 clock hours.

Remainder Greater Than Half an Academic Year Example



Payment Period for Clock Hour Programs Longer Than One Academic Year

Program Length (in clock hours)	First and subsequent full academic years		Remainder of program	
	First payment period	Second payment period	First payment period	Second payment period
<i>multiples of a full academic year</i>	<i>period of time in which student completes first half of academic year and first half of clock hours</i>	<i>period of time in which student completes second half of academic year and second half of clock hours</i>	N/A	N/A
<i>longer than 1 academic year, remainder shorter than or equal to one half of an academic year</i>	<i>period of time in which student completes first half of academic year and first half of clock hours</i>	<i>period of time in which student completes second half of academic year and the second half of clock hours</i>	<i>period of time in which student completes remainder of program and second half of clock hours</i>	N/A
<i>longer than 1 academic year, remainder shorter than academic year, but longer than half an academic year</i>	<i>period of time in which student completes first half of academic year and first half of clock hours</i>	<i>period of time in which student completes second half of academic year and second half of clock hours</i>	<i>period of time in which student completes first half of remainder of the program and second half of clock hours</i>	

Clock-hour and nonterm credit-hour programs where the school chooses to have more than two payment periods per academic year

For a program measured in credit hours without terms and for clock-hour programs, a school may choose to have more than two payment periods in the program or academic year, as applicable. If a school so chooses, the requirements for completing a payment period are modified to reflect the increased number of periods. For example, if a school chooses to have three payment periods in an academic year in a program that measures progress in credit hours but does not have academic terms, each payment period must correspond to one-third of the academic year measured in both credit hours and weeks of instruction. Each subsequent payment period cannot begin until the student completes the credit hours and weeks of instruction in the previous payment period.

If a student completes additional weeks or hours while completing the other measure of a payment period, these additional weeks or hours count towards completing the next payment period. If a school chooses to have more than two payment periods per academic year, the school must have that policy in writing and must apply the policy to all students enrolled in the programs affected.

Schools should note that making multiple disbursements within a payment period does not create a new or additional payment period.

So, for example, you may have multiple disbursements without having multiple payment periods. While the program regulations permit schools flexibility in making disbursements, schools should recognize the added complexity that making Pell disbursements over different periods than loan disbursements might cause if a student withdraws. To avoid overly complicating their Return of Title IV funds calculations, we recommend that, whenever possible, schools disburse all Title IV funds in the same payment periods.

Payment periods and eligibility for FFEL or Direct loans

For certain academic programs, FFEL and Direct Loans are disbursed differently than other FSA funds.

For programs offered in standard terms, or nonstandard terms of substantially equal length (i.e., all the terms in an academic year are within two calendar weeks of each other in length), the payment period for FFEL and Direct Loans is the term. A student in this type of program does not have to successfully complete the coursework to move to the next payment period. If a single term is the loan period, a student may not receive a second disbursement until the calendar midpoint of the term (loan period) is reached.

However, if the program is a clock-hour, nonterm credit-hour, or nonstandard term credit-hour program with terms that are not substantially equal in length, loan proceeds for FFEL and Direct Loans are not disbursed by payment period. Instead, the loan program rules for scheduling disbursements apply. For a student to be eligible for the second half of his or her loan proceeds, the student must reach **BOTH** the calendar midpoint of the loan period **AND** successfully complete half the coursework of the loan period.

“Substantially Equal”

FFEL: 34 CFR 682.604(c)(7)(ii)

DL: 34 CFR 685.301(b)(5)(ii)

Consider a program with no terms that is 24 credit hours long and offered in successive 4-hour modules with two 12-hour payment periods. The student can not receive the second half of the loan proceeds until the student successfully completes 12 hours and reaches the calendar midpoint of the loan period. A student who fails the first module cannot receive the second disbursement of the loan until s/he has successfully completed 3 additional modules (a total of 12 hours) **and** reached the calendar midpoint of the loan period.

Transfer or reentry for clock-hour and nonterm credit-hour programs

Reentry within 180 days

A student who withdraws from a clock-hour or credit-hour nonterm program and then re-enters within 180 days is treated as if he or she did not cease attendance for purposes of determining FSA award amounts.

Reentry or transfer within 180 days cite

34 CFR 668.4(e)

For credit-hour nonterm-based programs or programs that measure progress in clock hours, a student who withdraws and then reenters the same program at the same school within 180 days is considered to be in the same payment period he or she was in at the time of the withdrawal. The student retains his or her original eligibility for that payment period, and is treated as though he or she did not cease attendance.

Rentry or transfer after 180 days cite

34 CFR 668.4(f)

IMPACT OF CREDIT-HOUR/CLOCK-HOUR CONVERSION FORMULA ON PAYMENT PERIODS

If your program is subject to the credit-hour/clock-hour conversion formula, the clock hours in the payment period must support the number of credit hours in the payment period under the conversion formula. For a detailed discussion of the credit-hour/clock-hour conversion formula, including when it applies, see Volume 2, Chapter 4. For an example of clock-hour/credit-hour conversion, see the following page.

Clock-Hour/Credit-Hour Program Conversion Example

Sternberg University (SU) offers a two-year nondegree program measured in semester credit hours. Courses within the program are not creditable toward a degree at SU. Students in the program earn 16 credit hours per semester.

By applying the conversion formula, the school determines that the number of credit hours for Federal Student Aid purposes is 11 for the first two semesters, and 13 for the last two semesters.

Step 1

SU determines that there are 1,440 clock hours of instruction in the program. There are 330 clock hours of instruction in the first and second semesters (660 first-year total), and 390 clock hours of instruction in the third and fourth semesters (780 second-year total).

Total number of clock hours of instruction in the program: $(2 \times 330) + (2 \times 390) = 1,440$

Step 2

$\frac{330 \text{ clock hours}}{30} = 11$ credit hours in semesters one and two

$\frac{390 \text{ clock hours}}{30} = 13$ credit hours in semesters three and four

Step 3

For the first two semesters of the program, students are eligible for payment for only 11 credit hours of instruction (see Step 2). Because this is less than the full-time student minimum of 12 credit hours, students who attend the first two semesters are eligible to be paid for only three-quarter time attendance.

In the third and fourth semesters of the program, students are eligible to be paid for 13 credit hours of instruction (see Step 2). Students attending the third and fourth semesters can be paid as full-time students.

To see how this school determines the eligibility of the program, see Volume 2 – School Eligibility and Operations.

Direct Assessment program payment periods

Because Direct Assessment (DA) programs don't use credit or clock hours as measures of learning, you must establish a method to reasonably equate the DA program (or DA portion of any program) to credit or clock hours for the purpose of determining the payment periods in the program. You must provide a reasonable written description that supports your claim that the program or portion of a program is equivalent to a specific number of credit or clock hours. Note that any credits awarded for "life experience" are not counted for FSA purposes.

Direct Assessment Program Enrollment Status

34 CFR 668.10

Direct Assessment Academic Year and Week of Instructional Time

34 CFR 668.10 (a)(3)(i),(iii)

Direct Assessment Program Payment Period

34 CFR 668.10(a)(3)

For term credit-hour equivalent Direct Assessment (DA) programs, the payment period is the term.

For nonterm credit-hour equivalent DA program of one academic year or less, the first payment period is that period of time in which the student completes half of the credit hours and weeks of instruction in the program, and the second payment is the period in which the student completes the program.

For nonterm credit-hour equivalent DA programs of more than one academic year the first payment period is the period in which the student completes half of the credit hours and weeks of instruction in the academic year, and the second payment period is the period in which the student completes the academic year (for any remaining portion of the program that is more than 1/2 of an academic year but less than a full academic year, the first payment period is the period in which the student completes 1/2 the credit hours and weeks of instruction in the program and the 2nd payment period is the period in which the student completes the remainder of the program).

For clock-hour equivalent DA programs of one academic year or less, the first payment period is the period in which the student completes half of the clock hours in the program and the second payment period is the period in which the student completes the program.

For clock-hour equivalent DA programs that are more than one academic year in length, the first payment period is the period in which the student completes half of the clock hours in the academic year and the second payment period is the period in which the student completes the academic year (for any remaining portion of the program that is more than 1/2 of an academic year but less than a full academic year, the first payment period is the period in which the student completes 1/2 the clock hours in the program and the 2nd payment period is the period in which the student completes the remainder of the program).

Cost of Attendance (Budget)

Awards for each of the Federal Student Aid programs are based on some form of financial need, beginning with cost of attendance. This chapter picks up at the point where you have established the student's EFC (see the Application and Verification Guide) and the student's basic eligibility (see Volume 1). Most schools establish average costs for different categories of students and set these cost categories in EDExpress or other software that they use to determine awards and package aid. The typical costs that you establish for your students will be used to calculate their Pell Grant, Academic Competitiveness Grant (ACG), National Science and Mathematics to Retain Talent Grant (National SMART), Stafford, Campus-Based, awards (Chapters 3, 4, 5, and 6) and package their aid (Chapter 7).

Unlike scholarship programs that may award funds based on academic merit or the student's field of study, "need-based" grants, loans, and work-study are based on the family's demonstrated financial need for assistance.

The cost of attendance is the cornerstone of establishing a student's financial need, as it sets a limit on the total aid that a student may receive for purposes of the ACG/National SMART Grant programs, Campus-Based Programs and Stafford/PLUS loans, and is one of the basic components of the Pell Grant calculation.

ALLOWABLE COSTS

The cost of attendance for a student is an estimate of that student's educational expenses for the period of enrollment. As we'll see, you can use average expenses for students at your school, rather than actual expenses. For example, for the tuition and fees component, you can use the same average amount for all full-time students, instead of figuring the actual tuition and fees for each individual student. You can have different standard costs for different categories of students, such as a cost of attendance for out of state students (who have higher tuition) and a lower cost of attendance for in state students. However, you cannot combine the COA figures for each separate enrollment status and award aid to a student on the basis of the average COA. Students must be awarded on the bases of a COA comprised of allowable costs assessed all students carrying the same academic workload.

If a student is enrolled in a program that has extra fees or costs, such as lab fees, you can add those fees to the student's cost or use a standard cost that you've established for all students in that program. If you establish standard cost categories, you must apply the cost allowances uniformly to all students in those categories.

CHAPTER 2 HIGHLIGHTS

Allowable Costs

Determined by school, taking into account:

- Tuition and fees
- Books, supplies, transportation, personal, misc.
- Room and board
- Dependent care
- Study abroad expenses
- Disability expenses
- Employment expenses for co-op study
- Loan fees

Exceptions

- Less than half-time enrollment
- Correspondence study
- Incarcerated students
- Professional judgment

Costs met from other sources

- Tuition and fees not paid by student
- Free room and board
- Other cost specified by source

Costs for period of enrollment

- Campus-Based and Stafford/PLUS are based on costs for the period of enrollment; for instance, costs for a student attending a single semester in the school year would be limited to the costs for that time period.
- Pell and ACG/National SMART are always based on the cost of full-time attendance for a full academic year.

Cost of attendance components

The cost of attendance is determined by law (Higher Education Act, Sec. 472) and is not subject to regulation by the Department.

The law specifies the types of costs that are included in the cost of attendance, but you must determine the appropriate amount to include for each category for students at your school.

Less than Half Time COA Components

For students who are less than half time, COA can include only:

- tuition and fees
- an allowance for books and supplies
- transportation (but not miscellaneous & personal expenses) and
- an allowance for dependent-care expenses.
- a limited allowance for room and board, see p. 3-21.

Documentation of exceptional expenses

The law doesn't specify what documentation you must collect for expenses such as dependent care or disability-related expenses. You can document these expenses in any reasonable way, such as documenting an interview with the student or obtaining a written statement from the student or other appropriate sources.

HERA and reduced origination fees

HERA reduced the origination fees for FFEL and Direct loans. Make sure the COA allowance in your packaging software reflects the lower percentages. For details, see DCL GEN-06-02.

Disabled student

A student is considered disabled if he or she has a physical or mental impairment that substantially limits a major life activity, such as if the student is deaf, mentally disabled, hard of hearing, has a speech or language impairment, is visually disabled, seriously emotionally disturbed, orthopedically impaired, autistic, has a traumatic brain injury, is otherwise health-impaired, or has specific learning disabilities that require special education and related services.

There are different ways to arrive at average costs for your students, such as periodic surveys of your student population and local housing costs.

Allowable costs in general

The types of costs that may be included are the same for all FSA programs. The cost of attendance for the Campus-Based and Stafford/PLUS programs is a student's cost for the period in which the aid is intended. The cost of attendance used for ACG & National SMART Grants and Pell Grants is always the full-year costs for a full-time student, so you may have to prorate actual or average costs up for students who are attending less than an academic year (or who are part-time in a term program) or prorate down for students who are attending for periods longer than an academic year. We'll discuss this at the end of this chapter.

A student's cost of attendance generally is the sum of the following:

- **The tuition and fees normally assessed for a student carrying the same academic workload.** This includes costs of rental or purchase of equipment (including equipment for instruction by telecommunications), materials, or supplies required of all students in the same course of study.
- **An allowance for books, supplies, transportation, and miscellaneous personal expenses.** This can include a reasonable amount, as determined by your school, for the documented rental or purchase of a personal computer that the student will use for study for the enrollment period. For example, a computer purchased in the summer for use in the fall term may be included.
- **An allowance for room and board.** For students without dependents living at home with their parents, this will be an allowance that you determine. For students living on campus, the allowance is the standard amount normally assessed most residents. For those living off campus but not with their parents, the allowance must be based on reasonable expenses for the student's room and board (see example on next page).
- **For a student with dependents, an allowance for costs expected to be incurred for dependent care.** This covers care during periods that include, but that are not limited to, class time, study time, field work, internships, and commuting time for the student. The amount of the allowance should be based on the number and age of such dependents and should not exceed reasonable cost in the community for the kind of care provided.
- **An allowance for the one time direct costs of obtaining a first professional license or certificate for students who are enrolled in a program that requires such professional licensure or certification.** This allowance may only be provided one time per student per eligible academic program. Examples of allowable costs are fees charged to take a licensing exam and costs of

applying for and obtaining the license or certification. The cost must be incurred during (not after) a period of enrollment, even if the exam is after the end of the period.

- **For study-abroad programs approved for credit by the student's home institution, reasonable costs associated with such study.**
- **For a disabled student, an allowance for expenses related to the student's disability.** These expenses include special services, personal assistance, transportation, equipment, and supplies that are reasonably incurred and not provided by other agencies.
- **For students engaged in a work experience through a cooperative education program, an allowance for reasonable costs associated with such employment.**
- **For students receiving loans, the fees required to receive them (for example, the loan fee for a Direct Loan or the origination fee and insurance premium for a FFEL).** You may also include the fees required for nonfederal student loans (that is, nonfederal loans that must be considered EFA for the student when packaging aid). In all cases, you can either use the exact loan fees charged to the student or an average of fees charged to borrowers of the same type of loan at your school. To be included in the COA, any loan fees for private loans must be charged to the borrower during the period of enrollment for which the loan is intended.

Exceptions to the normal cost allowances

The following are the exceptions to the normal cost of attendance allowances discussed above:

- For students who are enrolled **less than half time**, only the costs for tuition and fees and allowances for books and supplies, transportation, a limited amount of room and board, and dependent care expenses may be included as part of the cost of attendance (miscellaneous expenses, and personal expenses may not be included).
- Generally, the cost of attendance for **correspondence study** is restricted to tuition and fees, which often include books and supplies. If the costs of books and supplies are separate, then they may also be counted in the cost of attendance. If the student is fulfilling a required period of residential training, the cost of attendance can also include required books and supplies, an allowance for travel, and room-and-board costs specifically incurred for the period of residential training (as mentioned in Chapter 1 of *Volume 1: Student Eligibility*, a student isn't eligible to receive FSA aid for correspondence courses unless the student is enrolled in an associate-, bachelor's-, or graduate-degree program).
- The cost of attendance for **incarcerated students** is limited to tuition and fees and required books and supplies. Remember that an incarcerated student is ineligible for FSA loans, and if the student is in a federal or state penal institution, he is ineli-

Free room and board example

Guerrero University saves some of its Resident Assistant jobs for students with exceptional financial need. All Resident Assistants receive a waiver of room and board charges. If the student quits the job, the waiver is removed and the student has to pay the room and board charges. All the students have the room and board charges in their cost of attendance. For students who are Resident Assistants because of their financial need, Guerrero must count the room and board waiver as estimated financial assistance. If the waiver is not included in taxable income, then the student must report the waiver amount as untaxed income on the FAFSA.

HERA on Less than half time room and board COA allowance

HEA Sec 472(4)

DCL GEN 06-05

HERA legislation specifies that schools may include in the COA for a less-than-half-time student an allowance for room and board for up to three semesters (or equivalent), with no more than two of the semesters being consecutive at any one school. You are not required to monitor COA components from other schools attended by the student.

HERA Change to Estimated Financial Assistance Component of COA

HEA Sec. 480(j)

DCL GEN 06-05

If the source of assistance is a State and is designated by the State to offset a specific component of the student's COA, the amount of that assistance may be excluded from both COA and EFA. You may exclude such assistance on a student-by-student basis, but if it is excluded, it must be excluded for both COA and EFA. If the amount excluded is less than the allowance provided in the student's COA, you must exclude the lesser amount.

Alternate example of waived or paid COA component

The state in which Guerrero University was founded charges all full-time students the same tuition charge. However, in-state students receive a voucher to cover the difference between what most states consider in-state versus out-of-state tuition. Guerrero has two options. The first option would allow Guerrero to include the same tuition charge in the full-time COA for all students and include the amount of the voucher as estimated financial assistance (EFA) in the respective students' financial aid packages. Alternatively, Guerrero could exclude the amount of the voucher from both COA and EFA, because the voucher must be used to explicitly pay a specific component of the COA. Regardless of the option Guerrero chooses, it must apply the option consistently.

WIA reimbursement contracts

Some WIA contracts operate on a reimbursement basis; that is, the student must fulfill the terms of the contract before WIA will reimburse the school for tuition and fee costs. If the student doesn't fulfill the terms of the contract, the school is left with an unpaid tuition and fees charge. The school isn't permitted to hold the student liable for the unpaid tuition and fees. Contracts are established this way to offer schools an incentive to properly train and place students enrolled in the training programs. However, if a tuition and fees charge is included in a Title IV recipient's budget, the student would be liable for any outstanding charges that are not reimbursed by WIA. Therefore, schools that enter into reimbursement contracts *must remove the tuition and fees component* from the Title IV budget because, under these contracts, schools are prohibited from holding the student liable for outstanding charges.

gible for Pell grants no longer applies as well.

- You have the authority to use **professional judgment** to adjust the cost of attendance on a case-by-case basis to allow for special circumstances. Such adjustments must be documented in the student's file. (See "Professional Judgment" in the *Application and Verification Guide*.)

Costs waived or paid by other sources

When a specific component of a student's cost of attendance is waived or explicitly paid by another source, special treatment may be necessary. In some situations, the student is charged the normal tuition and fees charge with an offsetting credit issued. In other situations, the student is never charged tuition and fees at all. Although this section discusses this concept in terms of tuition and fee charges, it applies to any of the components of a student's cost of attendance.

In some cases, such as under Workforce Investment Act (WIA) programs, a student's tuition and fees are paid by another organization or are waived. The student's costs are based on what the school is actually charging the student, based on the agreement between the school and the student.

If the student is charged for the tuition and fees, even if the charge is eventually paid by someone besides the student (e.g., a scholarship agency or other source of aid), then that tuition and fee amount is included in the cost of attendance in most circumstances (see sidebar on "Alternate example of waived or paid COA component"). The tuition and fees payment would then be counted as estimated financial assistance. The charge is documented in the same way as for any non-WIA student—for instance, in your school's contract with the student or in the agreement with the WIA agency. (If your school charges the student for tuition and fees, your school would have to expect the student to pay the charge if the WIA agency or other source of assistance doesn't pay on the student's behalf.)

If the student is never charged for tuition and fees, then the cost of attendance wouldn't include the tuition and fees component. Some WIA agreements with schools provide that the school can't charge the tuition and fees to the student, even if WIA doesn't cover the costs. If your school is prohibited under such an agreement from charging tuition and fees to the student, then the tuition and fees aren't included in the student's cost of attendance, and, therefore, that amount would not be included as estimated financial assistance.

Even if there's no tuition and fees component, the student's budget still includes the other costs listed previously, such as an allowance for living expenses. Note that a Pell Grant award to a student who has no tuition and fees may need to be based on the Alternate Schedule for "Tuition Sensitivity" (discussed in Chapter 3). The option to either include the cost and aid in both COA & EFA versus excluding both from COA & EFA only applies to non-Federal sources of assistance, and only when that assistance is designated to offset specific components of COA (ie tuition, room and board).

COSTS FOR PERIODS OTHER THAN NINE MONTHS

The cost of attendance used to package ACG & National SMART, as well as Campus-Based aid and Stafford/PLUS loans covers the student's actual period of enrollment. Therefore, if the student will be attending for more than 9 months, you must use a higher cost of attendance that includes living expenses, such as room and board, for the longer period of time. If the student will be attending for less than 9 months, you must use a lower cost of attendance. You can choose to prorate the allowances you use for 9 months, or can calculate the cost in any other reasonable way.

Adjusting Costs for Pell

The types of costs included in the Pell budget are the same as those for the other FSA programs; however, Pell costs are always based on the costs for a *full-time student for a full academic year*.

For Pell, costs for programs or enrollment periods longer or shorter than an academic year must be prorated so that they are the costs for one full academic year. This is true for both parts of the academic year definition: if either the number of weeks or the number of clock/credit hours differs from the academic year standard, the costs must be prorated to determine the full-time, full-year Pell budget. The need to prorate Pell costs is most likely to occur in these situations:

- a term-based program that provides less than 30 weeks of instructional time in an academic year.
- a nonterm program that provides less than 24 semester hours, 36 quarter hours, or 900 clock hours and/or provides less than 30 weeks of instructional time in an academic year; or
- a program that is longer than an academic year, where the costs for the entire program are charged at the beginning of the program.

There are two ways to prorate Pell and ACG/National SMART costs, as shown in the first two examples at the end of this section. Both of these examples are based on a program that is shorter than an academic year. The third example shows how costs are prorated when they are charged for a program that is longer than an academic year.

If the student is in a category where costs are limited, such as less-than-half-time enrollment, those costs that are allowable must be based on costs for a full-time student for a full academic year. For instance, the tuition component of the Pell cost of attendance for a less-than-half-time student must be based on the tuition costs that would be incurred by a full-time student attending a full academic year.

Note that prorating the cost of attendance usually does not affect the amount of Pell Grant the student receives. However, you're required to report the full-time, full-year Pell budget when reporting disbursements to COD.

Costs for a period other than 9 months

For Stafford, PLUS, ACG/National SMART and Campus-Based aid, the cost of attendance used for packaging must reflect the student's cost for that period that he or she is actually enrolled.

For instance, if a student is completing her program of study by taking a 1/2-time course load for the fall semester at your school, and that's the only term that she'll be attending in the award year, you could use the actual tuition and fee charges for the student's costs. If you use average costs for living expenses for a 9-month academic year for students in that program, you may divide your average costs by the number of terms in the academic year to find the cost for this enrollment period (assuming the terms are substantial in length).

For Pell Grants and ACG/National SMART, you could either use an average tuition cost for a full-time, full-year student in the program or prorate the student's actual tuition for the fall term to arrive at a full-year, full-time cost. Costs for living expenses may also be average costs for a full academic year—if a full-year average cost is used, it doesn't have to be prorated for Pell and ACG/National SMART Grant awards.

Costs for full program charged at start

A school may charge the total tuition cost for a program at the beginning of the first period of enrollment. If the program is longer than an academic year, for Stafford/PLUS loans and Campus-Based aid, the tuition costs apply only to the first period of enrollment. For Pell, you must prorate these charges to reflect the academic year in accordance with the procedures outlined in Chapter 3.

Changes in Pell COA

For more on when changes in Pell COA necessitate a recalculation of a Pell award, see Volume 3, Chapter 3.

Pell Grant Cost Example #1: prorating total costs by lesser of two fractions

You may take the student's entire cost of attendance (tuition and fees, room and board, etc.,) and multiply it by the lesser of the two fractions that represent the length of the academic year. If the lesser fraction is one, then you don't prorate the cost of attendance. One fraction is based on credit or clock hours and the other is based on weeks of instructional time, as shown in this example.

Let's use the example of a program that charges \$10,500, awards 18 semester credits, and is completed by most full-time students within 20 weeks of instructional time.

$$\frac{\text{Credit/clock hours in academic year definition} = 24}{\text{Credit/clock hours awarded} = 18}$$

$$\frac{\text{Weeks in academic year definition} = 30}{\text{Weeks provided} = 20}$$

Since the fraction using credit hours is the lesser fraction, the program cost of \$10,500 is multiplied by 24/18 to find the full-year Pell cost.

$$\$10,500 \times 24/18 = \$14,000$$

In this case, the full-time cost is \$14,000. (Note: If one of the fractions is equal to one, for instance, if the program awards 24 credit hours, then the prorated cost is the same as the original cost of attendance.)

Pell Grant Cost Example #2: prorating academic costs & living expenses separately

As an alternative, you can separately prorate the costs associated with credit or clock hours (tuition and fees, books and supplies, loan fees) and the costs associated with weeks of instructional time (room and board, miscellaneous expenses, disability expenses, transportation, dependent care, study abroad, reasonable costs associated with employment as part of a cooperative education program).

Using our earlier example of a program lasting 20 weeks and awarding 18 credit hours, and specifying that the student's tuition, books, supplies, etc come to \$4,500 and living expenses amount to \$6,000, the calculation would look like this:

$$\frac{24 \text{ credit hours}}{18 \text{ credit hours}} \times \$4,500 = \$6,000$$

$$\frac{30 \text{ weeks}}{20 \text{ weeks}} \times \$6,000 = \$9,000$$

In this example, the student's Pell budget is the sum of the two prorated costs, or \$15,000.

Pell Grant Cost Example #3: prorating costs for a nonterm program longer than an academic year

Costs must also be prorated if they are charged for a period longer than an academic year. You may use either of the proration methods shown in Examples 1 and 2.

We'll use the example of a program awarding 1,000 clock hours and providing 40 weeks of instructional time. Let's assume that the school uses the regulatory minimums in defining the academic year as 900 clock hours and 30 weeks.

The total costs over the 40 weeks, including tuition and living expenses, is \$5,900. If we use the method in Example 1, this amount must be prorated by the lesser of the following two fractions.

$$\frac{\text{Credit/clock hours in academic year definition} = 900}{\text{Credit/clock hours awarded} = 1000}$$

$$\frac{\text{Weeks in acad. year definition} = 30}{\text{Weeks provided} = 40}$$

The lesser of the two fractions is the one based on weeks (3/4). Multiply the total program cost by this fraction to determine the Pell costs for a full academic year: $\$5,900 \times 3/4 = \$4,425$.

Pell Grant cost of attendance for a consortium program

A student receiving a Pell Grant for attendance at two schools through a consortium agreement may have costs from both schools at the same time. The student's cost of attendance is calculated in the same way as for a student taking classes at only one school. The student's charges for tuition and fees and books and supplies at the consortium schools have to be combined into a single charge for a full academic year for purposes of the Pell calculation. The school paying the student can choose to use actual charges for the student, which would simply be the sum of the actual charges at both schools. Of course, if the student isn't attending full-time, your school will have to prorate these tuition and fees and books and supplies charges so that they are the correct amounts for a full-time, full-year student.

If the disbursing school is using average charges, then the average full-time charges at each of the schools must be prorated and combined. If the student is taking a full-time load at each school, the full-time tuition and fees charges for an academic year at each school can be averaged to determine the tuition and fee cost. However, if the student is taking an unequal course load, the disbursing school must prorate the charges based on the number of hours the student is taking at each school.

Pell Grant cost of attendance for a co-op program

If a student has a co-op job for the first term, the tuition and fees for that period can be prorated over the full academic year for the program (which must include at least 30 weeks of instructional time). This prorated amount is then added to the other cost of attendance components to arrive at the total cost for a full-time student for a full academic year.

For the rest of the year, your school can either use the cost of attendance with the projected amount or can recalculate the student's tuition and fees at the end of the first term to determine a new cost of attendance for the remaining payment periods. This decision must be consistent with your school's overall policy on recalculating for changes in a student's costs. (See the discussion of Pell Grant recalculations in Chapter 3 of this volume for more information.) Note that the cost of attendance can also include employment-related expenses.

Calculating Pell Grant Awards

Pell Grant awards are based on the EFC on the student's SAR or ISIR, the academic year structure (see Chapter 1), and the student's cost of attendance (see Chapter 2). The scheduled award amounts are specified on the Payment Schedules released by the Department prior to each award year. For term-based programs, awards for part-time students are also based on enrollment status, using the part-time charts in the Pell Grant Disbursement Schedules.

In this chapter, we'll show you how to take the award amount for the year and calculate Pell Grant payments for your students, using the appropriate formula for the term or nonterm calendar in the academic program.

SCHEDULED AWARD, AWARD YEAR, & ANNUAL AWARD

The Scheduled Award is the maximum amount the student can receive during the award year, if he or she attends *full-time* for a *full* academic year. The award year begins on July 1 of one year and ends on June 30 of the next year. For example, the 2007-2008 award year begins July 1, 2007, and ends June 30, 2008.

The student's *Scheduled Award* is established by the Pell Grant Payment Schedule that the Department issues prior to the start of each award year. The amount of the Scheduled Award is always taken from the Full-Time Payment Schedule, and is based on the student's EFC and Cost of Attendance.

The Scheduled Award is a maximum that can't be exceeded, even if the student transfers to another school or attends for a period longer than one academic year during the award year. For example, if a full-time student attends fall and spring semesters, and those terms encompass an academic year, the student would have no remaining eligibility in that award year for a summer term. (However, you can use the student's Pell Grant eligibility for the coming award year to pay a student for a summer term or other crossover payment period, as described later in this chapter.)

The annual award is the maximum amount a student would receive during a full academic year for a given enrollment status, EFC, and COA. Note that for a full-time student, the annual award will be the same as the Scheduled Award.

CHAPTER 3 HIGHLIGHTS

- Pell Grant calculations for:
 - Credit-hour term programs with fall through spring standard terms that provide 30+ weeks of instructional time (Formula 1 or Formula 3)
 - Credit-hour term programs with fall through spring standard terms that provide less than 30 weeks of instructional time (Formula 2 or Formula 3)
 - Any credit-hour term programs including nonstandard term programs (Formula 3)
 - Clock-hour programs and nonterm credit-hour programs (Formula 4)
 - Summer terms, crossover payment periods, and mini-sessions.
 - Transfer students
 - Recalculations (required and optional) when EFC, cost, or enrollment status changes

Scheduled Award limit

34 CFR 690.63(g)

Appendices

- Appendix A - Formula 2: Calculations for standard-term programs with less than 30 weeks in fall through spring
- Appendix B - Formula 5: Calculations for correspondence study programs
- Appendix C - Formula summaries for all five Pell formulas

2007-2008 Pell Payment Schedules

The 2007-2008 Pell Payment Schedules can be found on the IFAP website on the same page as the FSA Handbook Vol. 3

Multiple award provision

The law and regulations allow for the possibility of a second Scheduled Award during an award year under certain conditions, subject to available funding. If funds are available, we will inform you through a Federal Register notice and electronic announcement.

HEA Sec. 401(b)(6)(A), 34 CFR 690.67

Enrollment status under consortium agreement

The enrollment status of a student attending more than one school under a consortium agreement is based on all the courses taken that apply to the degree or certificate at the home institution. The disbursing school may have to make some adjustments if the coursework at the other school is measured in different units.

At a term school, a part-time student will have an *annual award* that is less than the Scheduled Award. If the student attends part-time, the student’s annual award is taken from the 3/4-time, 1/2-time, or less-than-1/2-time disbursement schedules.

For instance, if a student’s Scheduled Award is \$4,310, but the student is enrolled as a 1/2-time student in a term program, the student’s annual award would only be \$2,155.

		Full-Time Payment Schedule								Half-Time Disbursement Schedule					
		Expected Family Contribution								Expected Family Contribution					
Cost		0	500	1000	1500	2500	3000	Cost		0	500	1000	1500	2500	3000
1,000								1,000							
2,000								2,000							
3,000								3,000							
\$4,500 +	4310							\$4,500 +	2155						

Enrollment status for cooperative education

In a cooperative education program, your school assesses the work to be performed by the student and determines the equivalent academic course load. The student’s enrollment status is based on the equivalent academic course load.

The annual award is for a full academic year, and must be divided into payments for the payment period using the formulas described in this chapter. Note that if a student only attended half of an academic year, the student could receive no more than one-half of the annual award.

Consortium Different Units Example

Chris is taking 6 semester hours at Hart University, the home institution, and 9 quarter hours at Sarven Technical Institute. To determine his enrollment status, Hart needs to convert the hours at Sarven into semester hours. Because a quarter hour is about two-thirds of a semester hour, Hart multiplies the number of quarter hours by two-thirds:

9 quarter hours X 2/3 = 6 semester hours

Then the hours taken at both schools can be added together:

6 semester hrs. at Hart
 + 6 semester hrs. at Sarven
 12 semester hours

Linda is also taking 6 semester hours at Hart University and 9 quarter hours at Sarven Technical Institute, but her home institution is Sarven Technical Institute. Because Sarven is paying her, it needs to convert the semester hours taken at Hart into quarter hours:

6 semester hours X 3/2 = 9 quarter hours

Then, the hours taken at both schools can be added together:

9 quarter hrs. at Sarven
 + 9 quarter hrs. at Hart
 18 quarter hours

TERMS AND PAYMENT METHODS

Generally, if all the coursework is scheduled to be completed within a specific time frame, the program can be considered term-based. Term-based programs can have either standard terms or nonstandard terms. Generally, Pell Grants are calculated differently for the two types of terms. Standard term programs may be treated similarly to nonstandard term programs if the program does not conform to a traditional academic calendar.

Standard terms

Standard terms are semesters, trimesters, or quarters, as these words are traditionally used. In traditional usage, an individual semester or trimester provides about 14 to 17 weeks of instructional time and full-time is defined as at least 12 semester or trimester hours. The program’s academic calendar generally consists of three terms, one each in fall, spring, and summer. In traditional usage of the term “quarter,” an individual quarter provides about 10 to 12 weeks of instructional time, and full-time is defined as at least 12 quarter hours. The program’s academic calendar generally includes three quarters in the fall, winter, and spring and often a summer quarter as well.

Nonstandard terms

Any term that isn’t one of the standard terms described above is a nonstandard term. Sometimes schools refer to terms by standard names when they are, in fact, nonstandard terms. For example, a program may be made up of terms called quarters but progress is measured in semester hours.

Nonterm programs

Nonterm programs may be measured in either clock hours or credit hours. If the courses of a program are not offered in an academic calendar requiring the completion within the beginning and end dates of the terms, it is likely a nonterm program.

Ground rules for Pell

Fractions

When using fractions, be careful to multiply first, and then divide to avoid an incorrect result. For example, here's the correct way to prorate a \$2,130 Scheduled Award for a payment period that is a nonstandard term of 10 weeks of instructional time.

$$\$2,150 \times \frac{10}{30} \text{ is multiplied as } \frac{2,150 \times 10}{30} = 716.67$$

In this case, if you divide the fraction to get a decimal (.33333...) and then round the decimal either down (.33) or up (.34), your calculation will result in a number that's too low (709.50) or too high (731).

Rounding

Previously, schools were required to round to the nearest dollar when making disbursements. However, the Common Origination and Disbursement System (COD) accepts cents in payment amounts. Schools are not required to round disbursements to the nearest dollar, but can if they choose. Your school's policy of rounding, whether to the nearest dollar or cent, must be applied consistently to all students. Note that COD has very specific format requirements for payment amounts.

When rounding disbursements, round up if the decimal is .50 or higher; round down if it's less than .50. For instance, if a calculation results in a payment of \$516.50, round up to \$517. If the calculation result is \$516.49, round down to \$516.

If you're rounding disbursements for a student who is expected to be enrolled for more than one payment period in the award year, you have to alternate rounding up and rounding down to ensure that the student receives the correct amount for the year. For example, if a student had a Scheduled Award of \$1,025 to be paid in two payment periods, the first payment would be \$513 (rounded up from \$512.50), and the second payment would be \$512 (rounded down to ensure that the student isn't overpaid for the year).

The same principle applies when there are three or more payment periods in the award year. For instance, if the student has a Scheduled Award of \$1,100 and enrolls as a full-time student at a school using quarter terms, the payment for each term would come to \$366.66. If the school is rounding disbursements, the first two payments would be rounded up to \$367, and the last payment would be rounded down to \$366 to reach the total of \$1,100.

CREDIT-HOUR TERM-BASED PROGRAMS

Annual award based on enrollment status

In a term-based program, academic progress is always measured in credit hours, and the student's annual award depends on his or her enrollment status. Your school's standards for enrollment status must meet the minimum regulatory requirements, which are discussed in further detail in *Volume I: Student Eligibility (Chapter 1)*.

Academic calendar & enrollment status changes

Because the academic calendar for a program determines which Pell formula you use, you need to review the conditions for the use of each formula if the calendar for the program changes. This is particularly true if you are using Formulas 1 and 2, since they have the most restrictive conditions.

If a student's enrollment status changes during the year, your school may have to recalculate the student's Pell Grant payment based on the new enrollment status. At the end of this chapter we'll discuss when a school is required to recalculate due to a change in enrollment status.

34 CFR 690.63

34 CFR 690.80(b)

Including remedial coursework in enrollment status

When figuring enrollment status, your school must include any reduced-credit or noncredit remedial coursework designed to increase the student's ability to pursue his or her program of study. See the discussion of "Enrollment Status" in *Volume I: Student Eligibility (Chapter 1)*.

Variations in enrollment status standards

If a program uses standard terms, for Pell Grants only, the enrollment status standards in the program don't have to be proportional—for instance, a program could have a 15-hour standard for full-time enrollment, but set a 9-hour minimum for 3/4-time status and a 6-hour minimum for 1/2-time status.

In addition, your school's academic standard may differ from the enrollment standard used by the financial aid office for FSA purposes. For example, your school may define full-time as six hours during the summer; however, the financial aid office uses 12 hours as full-time for all terms including the summer term. Your school must apply its FSA full-time enrollment standards consistently to all students enrolled in the same program of study for all FSA purposes. 34 CFR 668.2, 34 CFR 690.2

For standard terms, the minimum enrollment standards are:

- Full-time: 12 semester hours per semester/trimester
12 quarter hours per quarter
- 3/4-time: 9 semester hours per semester/trimester
9 quarter hours per quarter
- 1/2-time: 6 semester hours per semester/trimester
6 quarter hours per quarter
- Less than 1/2-time: less than half of the workload of the minimum full-time requirement.

For nonstandard term enrollment standards, see p. 3-33. If the student is enrolled full-time, then the annual award is the Scheduled Award, which is based on the full-time Payment Schedule.

If the student is attending part-time, you must use the 3/4-time, 1/2-time, or less than 1/2-time disbursement schedules, depending on the number of credit hours in which the student enrolls. If the student is enrolled less-than-half-time, it will also affect the cost components that are used in the student's Budget (see Chapter 2). *Schools do not have the discretion to refuse to pay an eligible part-time student.*

Enrollment status for students taking regular and correspondence courses

If a student is enrolled in a noncorrespondence study program, but correspondence coursework is combined with regular coursework, the correspondence courses must meet the following criteria to be included in the student's enrollment status:

- The courses must apply toward the student's degree or certificate or must be remedial work to help the student in his or her course of study.
- The courses must be completed during the period required for the student's regular coursework, e.g., a term.
- The amount of correspondence work counted can't be more than the number of credit hours of regular coursework in which the student is enrolled.

If the student is taking at least a half-time load of correspondence courses, the student would be paid as at least a half-time student, regardless of the credit hours of regular coursework. A student will be paid as a less-than-half-time student for any combination of regular and correspondence work that is less than 6 credit hours or the appropriate equivalent of half-time.

On the appropriate full-time or part-time Payment or Disbursement schedules, use the student's Cost of Attendance and EFC to look up the Pell annual award for the year at that enrollment status. Most student aid software programs, such as EDEExpress, will do this for you automatically, but we have included a printed version of the 2007-2008 schedules at the end of this chapter for your reference.

Pell Grant payments by term

Pell Grants must be paid in installments over the course of a program of study to help meet the student's cost in each payment period. The payment period affects when Pell funds are disbursed and the exact amount to be disbursed. For credit-hour term programs, the payment period is the term. If the student doesn't enroll in one of the terms, he or she won't receive a portion of the award for that payment period. If the student's enrollment status changes in the next term, his or her annual award will be different for that term. (See discussion of terms and payment methods.)

Enrollment Status for Enrollment in Correspondence and Regular Coursework

Regular Work	Correspondence Work	Adjusted Total Course Work	Enrollment Status
3	3	6	Half time
3	6	6	Half time
3	9	6	Half time
6	3	9	Three-quarter time
6	6	12	Full time
2	6	6	Half time

This chart assumes that the school defines full-time enrollment as 12 credit hours per term, and half-time enrollment as 6 credit hours per term. As you can see in the second and third examples, the number of correspondence hours counted in the total course load was adjusted so that the correspondence hours never exceeded the regular hours taken. Note that in the last example, the student is eligible for payment based on half-time enrollment in correspondence courses, despite the fact that the student only took 2 credit hours of regular coursework.

FORMULA 1 : STANDARD TERM PROGRAMS WITH ACADEMIC CALENDARS OF 30+ WEEKS

For you to be able to use Formula 1, the program:

- must have an academic calendar that consists of standard terms; two semesters or trimesters, or three quarters—in the fall through spring;
- must have at least 30 weeks of instructional time in fall through spring terms;
- must not have overlapping terms; and
- must define full-time enrollment for each term in the award year as at least 12 credit hours and must measure progress in credit hours.

The term is the payment period, and you divide the student's award by the number of terms in the program's academic year.

Formula 1: Basic Calculation

To qualify for Formula 1, the program must use standard terms and have an academic calendar of 2 semesters or trimesters, or 3 quarters, and full-time enrollment must be at least 12 credit hours. In Formula 1, the annual award is simply divided by the number of terms in the fall through spring.

Take the case of Jeff, who is enrolled full-time in a program that has an academic year of 30 weeks of instructional time and 24 semester hours. The program has fall and spring semesters that provide a total of 30 weeks of instruction and a 12 week summer nonstandard term with 12 semester hours as full-time. Jeff has a Scheduled Award of \$3,000, and since he is enrolled full-time, that is also his annual award. Since the fall through spring has standard terms, it doesn't matter that the summer term is nonstandard; you still calculate summer payment based on Formula 1.

$$\frac{\$3,000}{2} = \$1,500 \text{ disbursement for each payment period}$$

The same formula would be used if Jeff enrolled in a program that has fall, winter, and spring quarters that provide at least 30 weeks of instruction. The only difference is that Jeff's annual award of \$3,000 is divided by 3.

$$\frac{\$3,000}{3} = \$1,000 \text{ disbursement for a quarter}$$

Note that Jeff is receiving a full Scheduled Award because he is attending for two terms as a full-time student and has no remaining eligibility for the summer payment period included in the award year. Next, we'll show other situations where a student might have remaining eligibility for summer, or can be paid for summer out of the next award year.

Requirements to be able to use Formula 1

34 CFR 690.63(a)(1)

Basic Pell calculations

Pell payment schedules: 34 CFR 690.62

Pell formulas: 34 CFR 690.63

"Crossover" payment periods (e.g., summer sessions):

34 CFR 690.64

Consistent use of formula

You must use the same formula for a program for all payment periods in an award year.

Standard term composed of shorter terms or modules

Remember that you can combine shorter terms or modules into a standard term that meets the requirements for Formula 1. See the discussion of academic calendars in Chapter 1 for examples.

Alternate calculation

If your school has a summer term, you may wish to use an alternate calculation that spreads the Scheduled Award over the summer term as well if your students attend full-time, year round.

Alternate schedules for low tuition costs

Use the alternate schedules to look up the annual award for students whose:

- tuition plus dependent care and/or disability expenses are less than \$675 (based on full-time full-year costs);
- total cost of attendance is \$3,400 or higher; and
- EFC is 700 or less.

In addition, the law now specifically provides that schools that charged only fees in lieu of tuition as of October 1, 1998, can count those fees as tuition for this calculation.

Formula 1: Enrollment status change

Let's say that one of your students, Micki, enrolls full-time in the fall semester. She has a cost of \$10,000 and EFC of 100, so her Scheduled Award, taken from the full-time Payment Schedule, is \$4,260. Since she's attending full-time, this is also her annual award. If your school defines its academic year as 30 weeks of instructional time and 24 semester hours, Micki's annual award is divided by 2 to arrive at the disbursement for the fall semester.

$$\frac{\$4,260}{2} = \$2,130 \text{ for Fall}$$

Micki decides that a full-time schedule is too ambitious, so she enrolls in the spring term as a 3/4-time student. Her EFC is the same, and even though her tuition is slightly less, the Pell award is still based on full-time costs. However, her annual award is now based on the 3/4-time disbursement schedule, so her spring payment will be less than her fall payment.

$$\frac{\$3,195}{2} = \$1,597.50 \text{ for Spring}$$

Note that Micki's Scheduled Award is still \$4,260, and she has only received \$3,727.50. This means that she is still eligible for up to \$532.50 in Pell funds from this award year if she attends a summer term that is part of the same award year. (We'll discuss other summer term payment options later in this chapter.)

Formula 1: Alternate calculation

If you're working with a standard-term program that meets the rules for Formula 1, the regulations give you an option to divide the annual award by the number of all the terms (including the summer term) in the award year. Schools that use this alternate calculation have programs where full-time students attend year round. The alternate calculation ensures that students get Pell payments in all terms in the award year. The disadvantage is that a student who misses one of the terms (such as a summer term), won't get a full Scheduled Award for that year.

34 CFR 690.63(b)(3)(ii)

If you choose to use this alternate calculation, you must:

- use the alternate calculation for *all* students enrolled in the same program of study;
- use the alternate calculation for all payment periods in the award year;
- increase the number of weeks of instructional time in the academic year defined for the student's program to include the number of weeks of instructional time in the summer term; and
- include the costs for the additional term in the Pell cost of attendance.

Your school may also include the number of credit hours for the additional term in your definition of the academic year for the student's program.

For example: Kevin enrolls as a full-time student in a 2-year associate degree program at Ivers College (IC). The academic calendar consists of two 15-week semesters. The program also has a summer semester that is the same length.

IC decides to use the alternate calculation to distribute the award over all three terms, as its students attend full-time throughout the award year. IC defines the academic year as 36 semester hours and 45 weeks of instructional time (both the weeks and the credit hours for the summer term are included in the academic year). Kevin's Scheduled Award is \$3,600. He's attending full-time, and so his annual award is the same. Using the alternate calculation, ICC divides the annual award by the payment periods in the award year.

$$\frac{\$3,600}{3} = \$1,200 \text{ disbursement per term}$$

FORMULA 2: STANDARD-TERM PROGRAMS WITH LESS THAN 30 WEEKS IN THE FALL THROUGH SPRING

Formula 2 may be used for programs that would qualify for Formula 1 except that the program's academic calendar provides less than 30 weeks of instructional time in the fall through spring terms. Like Formula 1, it simplifies the calculation payments by providing for the same calculation for all payment periods in the award year. Only a small number of schools use Formula 2; therefore, it is covered in Appendix A of this chapter.

FORMULA 3: GENERAL FORMULA FOR ANY TERM-BASED PROGRAM

Any term-based program may use this formula for Pell calculations, but you *must* use this formula for a term-based program that does not qualify for formulas 1 or 2. For instance, a program that uses only nonstandard terms.

To calculate the payment for the term, you must prorate the annual award that you looked up on the appropriate Pell Grant Payment or Disbursement Schedule. Unlike the term calculation in Formula 1, the annual award can't simply be divided evenly among the terms. Instead, you must multiply the annual award by a fraction that represents the weeks of instructional time in the term divided by the weeks of instructional time in the program's academic year.

$$\frac{\text{weeks* in term}}{\text{weeks* in academic year (at least 30)}}$$

If the resulting amount is more than 50% of the annual award, your school must make the payment in at least two disbursements in that payment period regardless of whether the term is a standard term or a nonstandard term. A single disbursement for a payment period can never be more than 50% of the annual award. You may disburse more than 50% of the annual award once the student has completed half of the weeks of instructional time in the program's academic year definition.

Enrollment status standards for nonstandard terms

If you are using Formula 3 for a program that has standard terms, the minimum enrollment standards previously discussed would still apply for the standard terms. However, if a program has nonstandard terms, the enrollment standard must be calculated for the nonstandard terms. The full-time enrollment status is determined for a nonstandard term based on the length of the term in relation to the academic year**

$$\text{Credit hours in academic year} \times \frac{\text{weeks* in nonstandard term}}{\text{weeks* in academic year (at least 30)}}$$

** If the resulting number isn't a whole number, it is rounded up to the next whole number. For example, 3.3 is rounded up to 4, if the program's coursework is offered in whole credits. If the program's coursework is offered in fractions, the full-time enrollment status need not be rounded. For example, 3.3 would remain 3.3 as full-time and a student taking 3.4 credits in the term would be full-time.

Disbursing more than 1/2 the annual award and the 50% Requirement

34 CFR 690.63(f)

If the disbursement for the payment period results in more than 1/2 of the annual award and occurs after half of the weeks of instructional time have passed during the payment period, you can make a disbursement of the full payment for the payment period.

EXAMPLE: Your school has a program that must use Formula 3. The program has 3 terms with 17, 14, and 6 weeks of instructional time and defines its academic year as 30 weeks of instructional time and 24 semester hours. Debbie is attending half-time for all three terms. Her payments for each payment period are 17/30, 14/30, and 6/30 of her half-time annual award. For the first term, you may disburse 15/30 of her award at the beginning of the term and the final 2/30 only after the 15th week of instructional time in the term. However, if Debbie establishes eligibility in the 16th week of the term, you can make a disbursement of 17/30 of the annual award at that time. Her award for the 2nd and 3rd terms may be disbursed in a single disbursement.

When to use Formula 3

- If a term program uses only nonstandard terms, or if a term program has standard terms, but does not qualify for formulas 1 or 2, you must use Formula 3 for Pell calculations.
- Any term program can opt to use Formula 3. However, standard term programs that qualify for Formula 1 or 2 generally

Regulatory citations

Formula 3 described: 34 CFR 690.63(a)(3)

Enrollment status for nonstandard terms:

34 CFR 690.63(d)(1)(ii)

Disbursement cannot exceed 50% of the annual award:

34 CFR 690.63(f)

Fractions

Remember when using fractions, multiply first, and then divide.

Dividing the fraction first to produce a decimal can cause an error if you need to round the decimal up or down.

*These fractions use weeks of instructional time as defined in Chapter 1, which are not necessarily the same number as the calendar weeks in an academic year.

After your school has determined the number of credit hours required for full-time enrollment, your school can then determine the less-than-full-time status for the nonstandard term using the following formula:

$$\frac{\text{Credit hours student takes in the nonstandard term}}{\text{Credit hours required for full-time enrollment in the nonstandard term}}$$

Formula 3: Payments for standard terms

Hope College has a semester-based program with a 2-semester academic calendar that comprises 28 weeks of instructional time. The program's academic year is defined as 24 semester hours and 30 weeks of instructional time. If both semesters are 14 weeks in length, the Pell payment for a full-time student with a Scheduled Award of \$4,050 would be calculated as follows:

$$\frac{14 \text{ weeks* in term}}{30 \text{ weeks* in academic year}} \times \$4,050 = \$1,890$$

Formula 3: Payments for nonstandard terms of equal length

Just a few miles down Rio Road from Hope, Crosby University has a program that consists of four 8-week terms. Crosby University defines the academic year as 40 quarter hours and 32 weeks of instructional time. Because this program does not use standard terms (semesters, trimesters, or quarters), Crosby University must use Formula 3 to calculate Pell disbursements for students in the program. Let's use the example of a student who attends all four terms for 10 quarter hours each term in the 2007-08 award year, and has a Scheduled Award of \$3,700.

Because the program has nonstandard terms, Crosby University must determine the number of credit hours required for full-time enrollment in each term, as follows:

$$\frac{8 \text{ weeks* in term}}{32 \text{ weeks* in academic year}} \times 40 \text{ quarter hours} = 10 \text{ quarter hours}$$

A student enrolled for 7 hours could be paid as a half-time student ($7/10 = .7$, which is less than $3/4$ [.75] but greater than $1/2$ [.5]) Since the student in our example will be enrolled for 10 hours each term, she is a full-time student and her annual award is the same as her Scheduled Award. This is a term-based, credit-hour program, so the payment period is the term.

To determine the student's payment for each payment period, multiply her annual award by the length of the nonstandard term compared to the length of the academic year:

$$\frac{8 \text{ weeks* in term}}{32 \text{ weeks* in academic year}} \times \$3,700 = \$925$$

*These fractions use weeks of instructional time as defined in Chapter 1, which will not necessarily be the same number as the calendar weeks in an academic year.

Formula 3: Payments for nonstandard terms of unequal length

Owen is enrolled in a semester-hour program at Hart University that has a 10-week nonstandard term between two 12-week nonstandard terms. The terms do not overlap. The academic year for the program is defined as 34 weeks of instructional time and 24 semester hours. Courses are offered in whole credits. Hart must use Formula 3 to calculate Pell Grant payments for students in this program. Owen's Scheduled Award is \$3,060. He enrolls for 6 semester hours in each of the three terms. Because the program has nonstandard terms, Hart must determine the number of credit hours required for full-time enrollment in each term, as follows. For the first and third term:

$$\frac{12 \text{ weeks* in term}}{34 \text{ weeks* in academic year}} \quad \times \quad 24 \text{ semester hours} = 8.47 \text{ (round up to 9)}$$

For the second term:

$$\frac{10 \text{ weeks* in term}}{34 \text{ weeks* in academic year}} \quad \times \quad 24 \text{ semester hours} = 7.06 \text{ (round up to 8)}$$

A student must enroll in 9 semester hours (rounded up from 8.47) in the first and third terms, and 8 semester hours (rounded up from 7.06) in the second term, to be full-time. Owen is enrolled half-time in the first and third terms (6 semester hours/9 semester hours = .67). He is enrolled three-quarter time in the second term (6 semester hours/8 semester hours = .75). The cost of attendance does not need to be prorated because the fall through spring terms provide the same number of weeks of instructional time as in the academic year definition. Further, the school has determined the costs for a full-time student for a full academic year.

Based on a cost of attendance of \$8,745 and an EFC of 1214, the half-time disbursement schedule shows that Owen is eligible for an annual award of \$1,530. Because this is a term-based credit-hour program, the payment period is the term. To calculate Owen's payment for the first and third terms, the school uses the fraction 12/34:

$$\frac{12 \text{ weeks* in term}}{34 \text{ weeks* in academic year}} \quad \times \quad \$1,530 = \$540$$

Owen's payment for each of the first and third terms will be \$540.

Since Owen's enrollment status for the middle term is three-quarter time, the payment for that term is based on a three-quarter-time annual award of \$2,295. To calculate the payment for the middle term, the school uses the fraction 10/34:

$$\frac{10 \text{ weeks* in term}}{34 \text{ weeks* in academic year}} \quad \times \quad \$2,295 = \$675$$

Owen's payment for the middle term (the second payment period) is \$675*These fractions use weeks of instructional time as defined in Chapter 1, which will not necessarily be the same number as the calendar weeks in an academic year.

Requirements for using Formula 4

34 CFR 690.63(a) and (e)

All clock-hour and nonterm credit-hour programs must use Formula 4.

Formula 4: 34 CFR 690.63(a)(4),(e) and (f)

Enrollment status standards for clock-hour and other nonterm programs

For nonterm programs, the enrollment minimums are:

Full-time in credit hours: 24 semester hours, 24 trimester hours, or 36 quarter hours per academic year.

Less than 1/2-time status is defined as less than half of the workload of the minimum full-time requirement.

Full-time in clock hours: at least 24 clock hours per calendar week.

Coursework completion requirement & withdrawal/re-entry

Note that students in nonterm programs must successfully complete a payment period to receive subsequent payments. This will be discussed in Volume 4 as one of the disbursement rules.

We'll discuss the effect of withdrawal and re-entry into a program in Volume 5.

Receiving less than the Scheduled Award due to crossover

A student may also receive less than a Scheduled Award in an award year, if the program crosses award years and the student's Pell Grant award in one of the award years is for a portion of the program that is less than a full academic year

Full-time students' completion

- For nonterm programs, you must consider whether students are progressing at the minimum full-time rate or a greater rate.
- If no students are progressing at a full-time rate in a program with fewer hours than the Title IV academic year, you must determine the weeks of instructional time it would take a full-time student to complete the hours in the lesser of the program or academic year. For example, a 30 quarter-hour program has an academic calendar in which students complete the program in 30 weeks of instructional time. With a defined academic year of 36 quarter credits and 30 weeks of instructional time, the students in the program are not full-time. A full-time student would complete 30 quarter credits in not greater than 25 weeks of instructional time. Therefore, the institution must use 25 in the numerator of the first fraction of the Pell calculation.
- If the program is at least an academic year in length and no

FORMULA 4: CLOCK-HOUR AND NONTERM CREDIT-HOUR PROGRAMS

Checking 1/2-time enrollment status

For clock-hour programs and for nonterm credit-hour programs, enrollment status only makes a difference if the student is attending less than half time. If that's the case, only certain components of the cost of attendance are used. (See discussion in Chapter 2.)

The annual award for a student in a clock-hour or nonterm credit-hour program is taken from the full-time Payment Schedule, even if the student is attending less than full-time. This requirement includes using the full-time Payment Schedule for certain low-cost students (see sidebar on low tuition costs, p.31).

Calculating payment amounts

Pell Grants must be paid in installments over the course of the academic year or program of study to help meet the student's cost in each payment period. The payment period determines when Pell funds are disbursed and the exact amount to be disbursed. You must use the rules discussed in Chapter 1 to determine the payment periods for clock-hour and nonterm credit-hour programs.

In nonterm programs, the student's Pell award is not reduced for part-time enrollment unless the student is enrolled less than half-time in which case the student's cost of attendance must be adjusted. However, if the program is less than an academic year (in either clock/credit hours or weeks of instructional time), students enrolled in that program won't receive a full Scheduled Award.

As in the case of the other formulas, you must perform comparable prorations of the award for each payment period in the student's program. The calculation for the payment period prorates a student's Scheduled Award based on weeks of instructional time most full-time students are attending and the credit/clock hours in the payment period as they compare to the defined academic year. The first step in determining the payment for a payment period involves prorating the student's Scheduled Award by the least of:

Weeks* for most full-time students to complete hours in program

Weeks* in program's academic year (at least 30 for credit-hr, at least 26 for clock-hr)

or

Weeks* for most full-time students to complete hours in academic year

Weeks* in program's academic year (at least 30 for credit-hr, at least 26 for clock-hr)

or

One

*These fractions use weeks of instructional time as defined in Chapter 1, which are not necessarily the same number as the calendar weeks in an academic year.

Note that the result of this multiplication won't ever be greater than the Scheduled Award. Because the Scheduled Award is the amount for a full-time student, the numerators of the fractions use the weeks of instructional time needed for most full-time students to complete the lesser of the hours in the program or academic year. You must determine the weeks of instructional time it takes most full-time students to complete the hours in the program or the academic year.

The next step is to take into account the clock/credit hours in the payment period. To account for the hours, you must multiply the result of the first step by the following fraction, the result of which is the payment for the payment period:

$$\frac{\text{Clock/credit hours in the payment period}}{\text{Clock/credit hours in the program's academic year}}$$

students are progressing at full-time, you will default to multiplying the Scheduled Award by one (1).

- If the students are progressing at a faster rate than the minimum full-time standard, you must determine how many weeks of instructional time it takes for most full-time students to complete the lesser of the hours in the program or academic year. For example, you determine that, in a self-paced bachelor's degree program, students on average complete 24 semester hours in 24 weeks of instructional time across the program. With an academic year defined as 24 semester hours and 30 weeks of instructional time, the first step of the Pell calculation of a payment period is 24/30.

Payments for credit-hour nonterm program (Formula 4)

Evers is enrolled at Tinkers Technical Institute (TTI) and has a Scheduled Award of \$3,900. His program is 24 quarter hours and most full-time students complete the program in 20 weeks of instructional time. The academic year for the program is defined as 36 quarter hours and 30 weeks of instructional time. TTI has established two payment periods of 12 quarter hours and 10 weeks* each for Evers' program. To determine the disbursement for the payment period, TTI must first multiply the Scheduled Award by a fraction representing the proportion of weeks of instructional time for most full-time students to complete the hours in the program:

$$\frac{20 \text{ weeks* in program}}{30 \text{ weeks* in academic year}} \times \$3,900 = \$2,600$$

TTI then multiplies the result by a fraction representing the proportion of credit hours for the payment period compared to the academic year:

$$\frac{12 \text{ quarter hours in payment period}}{36 \text{ quarter hours in academic year}} \times \$2,600 = \$866.67$$

Evers' payment for the first payment period will be \$866.67. Evers can receive this payment when he begins the program. Because students don't earn any of the 24 quarter hours until they complete the entire program, TTI can make the payments of \$866.67 for the second payment period after TTI has determined that Allen has successfully completed 12 quarters hours and 10 weeks of instructional time of the program.

Payments for clock-hour program (Formula 4)

Chance is enrolled in a 650-clock-hour program at Tinkers Technical Institute (TTI) and is eligible for a Scheduled Award of \$2,150. Most of the full-time students in the program finish it within 22 weeks of instructional time. TTI defines the academic year for the program based on the regulatory minimums: 900 clock hours and 26 weeks of instructional time. To calculate Chance's payment, TTI calculates the payment for each payment period as follows:

$$\frac{22 \text{ weeks* in program}}{26 \text{ weeks* in academic year}} \times \$2,150 = \$1,819.23$$

$$\frac{325 \text{ clock hrs in payment period}}{900 \text{ clock hours in academic year}} \times \$1,819 = \$656.86$$

*The fractions in these examples use weeks of instructional time as defined in Chapter 1, which will not necessarily be same number as the calendar weeks in an academic year.

Chance's payment for the first payment period will be \$656.86. She can get this payment when she begins the program. She can receive her second payment of \$656.86 after she successfully completes the 325 clock hours in the first payment period.

FORMULA 5: CORRESPONDENCE STUDY

Formulas 5A & 5B are formulas that must be used for correspondence students. Because there are only a small number of Pell Grants made to correspondence students, the formula for correspondence study programs is covered in Appendix B of this chapter.

SUMMER TERMS & OTHER “CROSSOVER PAYMENT PERIODS”

Payment periods don't always fall neatly into one award year or another. A new award year starts every July 1. When a payment period falls into two award years—that is, it begins before July 1 and ends on July 1 or later—it's called a “crossover payment period.”

The formula for calculating the payment for a crossover payment period is the same as that for any other payment period in the award year. However, you must check the student's remaining eligibility if a student has already received payments for previous payment periods in the award year and the crossover period is assigned to the earlier award year.

Payment from either award year

You can make a payment for a crossover payment period out of either award year, if the student has a valid output document for the award year selected. However, if more than six months of the payment period is in a given award year, the Pell payment must be made from that award year.

The decision about which award year to use is usually based on the student's remaining eligibility in the earlier award year. You can assign the crossover payment period to either award year, on a student-by-student basis—you do not have to attribute the crossover period to a particular award year for all students. For instance, if a student had already been paid for two semesters as a full-time student for a full 30-week academic year in the 2006-2007 award year, the student would have been paid a full Scheduled Award for that year. In this case you might choose to pay the student for the crossover payment period out of the 2007-08 award year, provided the student is eligible for Pell based on a SAR or ISIR for that year (if the student attended part-time or didn't attend for a full academic year, the student might be eligible for at least a portion of the normal disbursement from the 2006-2007 award year for the crossover period).

You may also attribute the crossover payment period to a particular award year for all students enrolled in that period. For instance, you could attribute your summer session in 2008 to the 2007-08 award year for the purposes of all Pell payments for that period. However, if you attribute the crossover period to the 2007-08 award year for all students, you must pay Pell awards to all students enrolled in that payment period who have remaining Pell eligibility in the 2007-08 award year.

Scheduled Award limit and crossover payment periods

In most cases, the Pell Grant calculations assure that a student doesn't receive more than a Scheduled Award, but for some students, you will need to check the student's remaining eligibility before paying the student. In particular, if the student is attending more than an academic year's worth of courses in the same award year, the student could run out of eligibility for Pell. This most commonly happens with summer terms or crossover payment periods.

34 CFR 690.64

Alternate calculation that includes summer term

As noted earlier, if you're working with a standard-term program that meets the rules for Formula 1 or Formula 2, you may divide the annual award by the number of all the terms (including the summer term) in the award year. The advantages and disadvantages of this approach were discussed in the examples accompanying Formula 1.

Term schools: using the right formula for summer session

If your school offers a summer term in addition to Fall through Spring terms that qualify for Formula 1 or 2, you will calculate the student's payment for the summer term using the same Formula that you used to calculate payments for the other terms in the award year to which the summer term is assigned. If you use Formula 3 for Pell Grant calculations in any of the terms in an award year, then you must use Formula 3 for *all* terms in that program that occur in that award year, including the fall through spring terms. (Note that if your program is a standard-term program in the fall through spring and does not define full-time enrollment in the summer as at least 12 credit hours, you must use Formula 3 for Pell calculations for all terms in the award year.)

With regard to enrollment status, your school must apply its definition of full-time status for the summer term consistently for *all* FSA program purposes.

The cost of attendance for summer terms

Costs for summer terms are figured in the same way as for any other payment period; that is, the costs are based on a full academic year. If your school has fall and spring semesters that comprise an academic year, you can't add the costs for the summer term to the costs for the fall and spring semesters. The award for the summer term is still based on the costs for one academic year. However, if the academic year definition includes the summer term, then the costs for the summer term *must* be included in the cost for a full academic year.

Scheduled Award limit for summer term

Peter enrolls three-quarter time in the fall, spring, and summer terms at Hildebrand University. His Scheduled Award is \$3,000 and his three-quarter time annual award is \$2,250. Using Formula 1, Hildebrand determines that Peter can receive \$1,125 for each term.

For the fall and spring semesters, he'll receive a total of \$2,250. If Hildebrand wants to pay him for summer from the 2007-08 award year as well, it needs to see how much eligibility he has left. Subtracting the amount already received from the \$3,000 Scheduled Award, Hildebrand discovers that Peter only has \$750 of Pell eligibility left. Therefore, Peter can only receive \$750, instead of \$1,125, for the summer term.

As an alternative, Hildebrand could also pay Peter a full Pell disbursement for the summer term from the 2008-2009 award year, but that would reduce the amount of Pell that Peter could get for subsequent 08-09 terms. In the example below, Peter's 08-09 eligibility would be exhausted in the Spring term, since he will be attending full-time in Spring 2009, even though he qualified for a higher Scheduled Award in 08-09.

Option 1: Pay Summer from 2007-08 Scheduled Award (\$3,000)

Fall 07 = \$1,125 (3/4-time)	Spring 08 = \$1,125 (3/4-time)	Summer 08 = \$750 (remaining eligibility)
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Option 2: Pay Summer from 2008-09 Scheduled Award (\$3,200)

Summer 08 = \$1,200 (3/4-time)	Fall 08 = \$1,200 (3/4-time)	Spring 09 = \$800 (remaining eligibility)
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If the student was previously enrolled in the award year, you may be able to use the same cost of attendance for the summer term that it used for the immediately preceding term that the student attended. However, this isn't possible if the costs are different from the fall through spring such as a different tuition charge per credit hour or you are required to recalculate the cost of attendance. (See the end of this chapter for information on when recalculations are required.) If it's necessary to base the student's cost of attendance on the summer term, you must prorate the summer costs to establish the cost for an academic year. (See Chapter 2 on prorating costs in the Pell Grant program.)

If the summer session is the first term in the award year for that student (for example, your school is paying a student for the summer 2007 term from the 2007-2008 award year), you must establish the student's full-year cost based on the costs for the *summer* term. If the student enrolls in another term in that award year, you may have to recalculate the student's costs for the later term.

Summer minisessions

If a term-based school offers a series of minisessions that overlap two award years (by "crossing over" the June 30 end date for one award year), these minisessions may be combined and treated as one term. However, schools are not required to combine these minisessions.

When you combine minisessions into a single term (i.e., payment period), the weeks of instructional time in the combined term are the weeks from the beginning of the first minisession to the date the last minisession ends. The student's enrollment status for the entire payment period must be calculated based on the total number of credits the student is projected to take for all sessions. You must project the enrollment status for a student on the basis of the credits the student has:

- pre-registered or registered to take for all sessions;
- committed to take for all sessions in an academic plan or enrollment contract; or
- committed to take for all sessions in some other document.

When you combine the minisessions into a single term, a student cannot be paid more than the amount for one payment period for completing any combination of the minisessions. If the minisessions are not combined into a single payment period, you must treat each minisession as a separate nonstandard term using Formula 3 to calculate Pell Grant awards. Unless for each minisession you define full-time as at least 12 credit hours, you must use Formula 3 for each of the minisessions (If you use Formula 3 for the crossover term, remember that you must also use it for all other terms in the award year, including Fall through Spring.)

If the minisessions are combined in a single term and a student does not begin attendance in all of the minisessions, recalculation of prior disbursements is required based on the resulting changed enrollment status as discussed later in this chapter.

Minisession Enrollment Status Example

Bob is enrolled in a summer session with three-week minisessions that his school, Falcon University, has combined into 1 term. Falcon U. is using Formula 1 to calculate Bob's combined term, and knows as such they must define full-time enrollment as at least 12 credit hours, even though the individual component minisessions may have originally considered full-time to be something less than 12 credit hours. Bob is enrolled for 6 credits during the combined summer minisession term. Bob's enrollment status is equal to the proportion of his credits to the school's definition of full-time for the combined term. Therefore, Bob should be credited with half-time enrollment status for the combined summer term.

Combined minisessions into standard term

Brian enrolls part time at Hildebrand University which defines its academic year as 24 semester hours and 30 weeks of instructional time. In addition to fall and spring semesters, Hildebrand offers three summer minisessions. Each minisession provides 4 weeks of instructional time. Hildebrand can either combine the minisessions into a single nonstandard term, or treat each session as a separate nonstandard term. The school chooses to combine the sessions into a single payment period providing 12 weeks of instructional time with full-time enrollment in this period defined as 12 semester hours. If Hildebrand meets the conditions for use of Formula 1 in its fall and spring semesters, it can use Formula 1 to calculate Pell payments for this summer session.



Brian enrolls for 3 semester hours in each of the minisessions, so he's enrolled three-quarter time (9 hours total in the combined term). His Scheduled Award is \$3,500 and his annual award (from the 3/4-time disbursement schedule) is \$2,475. To calculate Brian's payment, Hildebrand simply divides the annual award by 2, the number of terms in the fall through spring: $\$2,475 / 2 = \$1,237.50$.

Brian can receive \$1,237.50 for the combined summer session if it's the first term of the award year. If he received payments for the fall and spring semesters from the same award year, the school would need to check his remaining eligibility to see how much he could be paid for the summer session. (See the earlier example of the Scheduled Award limit for a summer term.)

Minisessions treated as nonstandard terms

Suppose Hildebrand didn't combine these minisessions. If it defined full-time enrollment for each 4-week minisession as less than 12 semester hours, it would have to calculate all Pell payments for the program using Formula 3. Because these are nonstandard terms, Hildebrand would have to determine Brian's enrollment status for each mini-session by prorating the standard for full-time enrollment in a full academic year (24 semester hours):

$$24 \text{ semester hours} \times \frac{4 \text{ weeks}^* \text{ in term}}{30 \text{ weeks}^* \text{ in academic year}} = 3.2 \text{ semester hours (round up to 4^{**})}$$

For each of the 4-week terms, a full-time student must enroll in 4 semester hours, and based on that standard, the 3 semester hours that Brian is attending in each minisession counts as 3/4 time enrollment status. Note that Hildebrand would use the Pell cost of attendance for a full-time student attending a full academic year. Hildebrand would determine his payment for each minisession (assuming his Scheduled Award remains unchanged across both award years) using the following calculation:

$$\frac{4 \text{ weeks}^* \text{ in term}}{30 \text{ weeks}^* \text{ in academic year}} \times \$2,475 = \$330.00$$

Brian would receive \$330 for each of the minisessions, for a total of \$990 for the summer. Again, these payments for one or more minisessions that are in the prior award year may need to be reduced if Brian had previously received payments for the fall and spring semesters in the same award year.

** since Hildebrand only offers courses in whole credits

*These fractions use weeks of instructional time as defined in Chapter 1, which are not necessarily the same number as the calendar weeks in an academic year.

TRANSFER STUDENTS

The Pell payment for a transfer student is calculated in the same way as for any new student. That is, you must calculate payments for each payment period following the rules given in this chapter. However, a transfer student’s remaining Pell eligibility is reduced if the student received Pell funds for the same award year at any prior schools. You can identify the student’s prior Pell disbursements when you review his or her Financial Aid History in NSLDS (see sidebar).

Transfer student cites

34 CFR 690.65
 Mid-year transfer
 “Dear Colleague” Letter GEN-00-12
 Percent of remaining eligibility
 34 CFR 690.65(d)

NSLDS Financial Aid History and Transfer Monitoring

Before disbursing FSA funds to a transfer student, you must obtain a financial aid history for the student and you must inform NSLDS about the transfer student so that you can receive updates through the Transfer Student Monitoring Process. The financial aid history will not only identify Pell Grant disbursements that the student received at other schools, but tell you if the student is ineligible for any FSA aid due to default or overpayment, or if the student has reached annual or aggregate limits for Stafford loans. See Volume 1, Chapter 3, for a more detailed discussion of these requirements.

Why percentages are used

The reason for using percentages is that a transfer student may have different Scheduled Awards, for example, the costs of attendance at the two schools may be different. The percentages are also used to compare the portions of a student’s total eligibility that have been used at both schools. (If the student’s Scheduled Award is the same at both schools, the financial aid administrator can find the amount of the student’s remaining eligibility simply by subtracting the amount received at the first school from the Scheduled Award.)

Calculating remaining eligibility

Once you’ve identified the Pell amounts that a transfer student has already received for the ongoing award year, you must calculate the percentage of the Scheduled Award that has been used. This percentage is calculated by dividing the amount disbursed at the previous school by the student’s Scheduled Award at that school.

$$\frac{\text{Pell disbursed at prior school}}{\text{Scheduled Award at prior school}} = \% \text{ of Scheduled Award used}$$

Then subtract this percentage from 100%. The result is the maximum percentage of the Scheduled Award that the student may receive at your school.

Note that a transfer student receives the same payments as any other student until the limit (100% of a Scheduled Award) is reached. You give the student the full amount for each payment period, rather than trying to ration the remaining amount by splitting it evenly across the remaining terms.

Payment period for a transfer student at a nonterm school

When a student transfers into a nonterm credit-hour or clock-hour program at a new school, that student is starting a new payment period. For nonterm programs, you must use the payment period rules described in Chapter 1 to determine the payment periods for the remainder of the student’s program.

However, for a transfer student, the length of the program is the number of clock hours or credit-hours and the number of weeks, that the student will be required to complete in the new program. If the remaining hours in a clock-hour program are half an academic year or less, then the remaining hours constitute one payment period. For a nonterm credit-hour program, if the remaining credit hours *or weeks* are half an academic year or less, then the remaining hours and weeks constitute one payment period.

Retaking Coursework

For term-based credit-hour programs, students may generally receive FSA funds for retaking coursework and the credits may be included in the total number of credits that the student is taking when determining enrollment status as long as your school gives the student additional credit for the repeated course and the student is making satisfactory academic progress. Generally, schools do not give a student

credit for repeating a course to earn a better grade, unless the student fails a course the first time and receives no credit for the failure.

The treatment of repeated coursework is different for students in nonterm credit-hour and clock-hour programs. For more details and examples on retaking coursework, see the full discussion in Volume 4, chapter 2, *Disbursing FSA Funds*.

Transfer student example (calculating remaining eligibility) (one remaining term at new school)

Luna attends fall and winter terms at Lewis College in St. Louis using nonstandard terms. She then transfers to Clark University in Omaha for the spring semester. The aid administrator at Clark University checks NSLDS, which shows that Luna received \$1,003 in Pell payments and had a \$1,700 Scheduled Award. Luna is eligible for a \$2,100 Scheduled Award at Clark. To determine how much Luna can be paid, the aid administrator at Clark first figures out what percentage of the Scheduled Award she received at her first school:

$$\frac{\$1,003 \text{ disbursed at Lewis}}{\$1,700 \text{ Scheduled Award at Lewis}} = 59\%$$

Subtracting this percentage from 100%, the aid administrator finds that Luna is eligible for 41% of her Scheduled Award at Clark. The Scheduled Award is multiplied by this percentage to find the dollar amount of Luna's remaining eligibility.

$$41\% \times \$2,100 \text{ Scheduled Award} = \$861 \text{ remaining Pell eligibility}$$

A student with a \$2,100 Scheduled Award would ordinarily receive a \$1,050 payment for one semester (if enrolled full-time). However, Luna can't be paid more than \$861, because she has received 59% of the Scheduled Award at Lewis College.

Transfer student example (two remaining terms at new school)

Dmitri transfers to Bylsma Conservatory during the award year and enrolls for two terms. He would ordinarily receive a \$500 payment for each term. However, his remaining eligibility, based on payments at the previous school, is only \$600. Rather than "rationing" this amount by splitting it into two \$300 payments for the two terms, Bylsma must pay Dmitri \$500 for the first term and the remainder (\$100) for the second term in accordance with the requirements for calculating the payment for the payment period. This way, Dmitri will receive the full payment he's entitled to for the first term, even if he doesn't return for the second term.

Calculating a Pell award when a student who owes an overpayment returns to a standard term-based educational program in the same award year

Consider a student who is eligible for Federal Pell Grant funds and who transfers from one school (school A) to another school (school B) within the same award year. Before paying any Pell funds to the student, school B must determine the percentage of eligibility remaining to the student. After transferring, a student's remaining Pell Grant eligibility during an award year is equal to the percentage of the student's *scheduled award* that remains unused, times the student's scheduled award at the new school.

School B may pay the student a Pell Grant only for that portion of an academic year in which the student is enrolled and in attendance at school B. The grant must be adjusted, as necessary, to ensure that the funds received by the student for the award year do not exceed the student's scheduled award for that award year.

The award for each payment period is calculated using the (full) scheduled award. The student receives a full award until the student has received 100% of the student's remaining eligibility. This avoids a school having to ration the remaining amount by splitting it evenly across the remaining terms.

To calculate a transfer student's remaining eligibility, school B must first determine what percentage of the scheduled award the student used at school A. On the student's current ISIR, on the Financial Aid History Page, in a section headed ***Pell Payment Data***, school B will find an entry for ***% Sch. Used***. School B subtracts the percentage listed under ***% Sch. Used*** from 100%. The remainder is the unused percentage of the student's scheduled award — the percentage the student may receive at school B. (One uses percentages rather than dollars because a transfer student may have different scheduled awards at the two schools, and using percentages rather than dollars adjusts for this possible difference.) School B then multiplies the percent of eligibility remaining times the scheduled award at the new school. The result is the maximum amount of Federal Pell Grant funds the student may receive at school B during the balance of the award year.

Note: Following the appropriate procedures relative to the figure reported in ***% Sch. Used*** will ensure that a transfer student does not receive more than 100% of the student's scheduled award. Therefore, school B may ignore the actual grant and overpayment amounts from school A in school B's calculations.

RECALCULATIONS

In certain cases, you may have to recalculate the student's Pell Grant after the initial calculation or disbursement, to account for changes to the student's costs, EFC, or enrollment status.

Change in the EFC (recalculation required)

If the student's EFC changes due to corrections, updating, or an adjustment, and the EFC change would change the amount of the Pell award, you must recalculate the Pell award for the entire award year. If, as a result of the recalculation, the student has received more than his or her award amount, then the student has received an overpayment. In some cases, you may be able to adjust an award by reducing or canceling later payments to the student in the same award year. However, if the overpayment can't be eliminated, you must follow the procedures in Volume 5 of the *FSA Handbook*.

A student selected for verification can't *increase* his or her eligibility based on a corrected output document that you receive during the "verification extension" (120 days after the student's last day of enrollment, not to extend beyond the deadline date established by a Federal Register notice). For example, if the student submits a reprocessed SAR during the extension period and the SAR has a lower EFC than the previous SAR (increasing the student's eligibility), you may not recalculate the student's Pell Grant based on the later SAR. The student would be paid based on the *higher* EFC on the SAR that was submitted earlier. However, if the corrections *reduce* the student's eligibility (that is, if the reprocessed SAR had a higher EFC), then the award must be calculated based on the reprocessed SAR.

Change in enrollment status between terms (recalculation required)

In a term program that uses credit hours, you must calculate a student's payment for each term based on the enrollment status for that term. If a student attended full-time for the first term and then enrolled half time in the second term, you must use the half-time enrollment status to calculate the student's payment for the second term.

Student doesn't begin attendance in all classes within a term (recalculation required)

If the student doesn't begin attendance in *all* of his or her classes, resulting in a change in the student's enrollment status, you must recalculate the student's award based on the lower enrollment status. A student is considered to have begun attendance in all of his or her classes if the student attends at least one day of class for each course in which that student's enrollment status was determined for Federal Pell Grant eligibility. Your school must have a procedure in place to know whether a student has begun attendance in all classes for purposes of the Federal Pell Grant Program. The Department does not dictate the method a school uses to document that a student has begun attendance. However, a student is considered not to have begun attendance in any class in which the school is unable to document that attendance.

Initial Calculation

An initial calculation is the first calculation that is made on or after the date the school has received an ED-product EFC* such as the student's initial SAR or ISIR with an official EFC and uses the enrollment status at the time of the initial calculation. If you've estimated the student's eligibility prior to receiving a SAR or ISIR for the student, you must confirm that prior estimated eligibility or determine the student's eligibility at the time the SAR or ISIR is received.

You should document the date that you initially calculate a student's Pell Grant. The earliest date is the date of receipt of an ED-product EFC*, such as on a SAR or ISIR (assuming the school has a documented or projected enrollment status for the student). If you fail to document the date of the initial calculation, you must use the later of (a) the date that the SAR or ISIR is first received and the student's enrollment status as of that date or (b) the date the student enrolls.

Your school is considered to have received the ISIR on the date it was processed. This date is labeled "Processed Date" on the ISIR. In the case of a SAR, your school is considered to have received it on the date processed unless you document a later date. The processing date on a SAR is the date above the EFC and, on a SAR Acknowledgment, the "Transaction Processed Date."

*Note: An ED-product EFC may be an EFC from a SAR/ISIR, FAA Access, or FAFSA on the Web.

Changes to the EFC

There are three ways that a student's EFC can change:

1. Corrections. The student may have to correct a mistake that was reported on the original FAFSA or SAR/ISIR. This frequently occurs as a result of verification, but it may also be a result of the student's own review of the SAR/ISIR.
2. Updating. In some cases, a student is required to update changes to dependency status, household size, and the number in college (see Volume I: Student Eligibility for details).
3. Professional judgment. You may, on a case-by-case basis, adjust one or more of the data elements used to calculate the EFC. In some cases, you might make an adjustment during the award year to reflect a student's changed circumstances. For example, if a wage-earning parent dies after the student's first semester, you could adjust the adjusted gross income in the EFC formula to reflect the loss of income. You may also determine that a dependent student should be considered independent.

If the student has already been paid based on the original EFC, the award will have to be recalculated.

***Change in enrollment status within a term
(optional recalculations)***

The regulations don't require any recalculation for changes in enrollment status after the student has begun attendance in all of his or her classes. However, your school can have a policy of recalculating an award if a student's enrollment status changes within a term. If such a policy is established, it must be applied consistently to all students in a program. For example, if the school chooses to recalculate for a student whose enrollment status increases from half-time to full-time, it must also recalculate for a student whose enrollment status decreases. If the school establishes a policy allowing optional recalculations for an educational program, this policy must be in writing.

Your school's policy may set a date after which Pell Grants will not be recalculated for enrollment status changes. For example, a school can establish a policy that it will recalculate Pell awards only for enrollment changes that occur up to the "add/drop" date of a term. The initial calculation of a student's Pell Grant may occur subsequent to the "add/drop" date of the term, including terms with compressed coursework. You must use the student's effective enrollment status on the date of the initial calculation, and there would be no recalculations of the student's Pell Grant for the term due to a subsequent change in enrollment status, assuming the student began attendance in each class. If the student's payment for the term is being disbursed in a subsequent payment period, you may pay the student only for the coursework completed in the term.

In the case of programs offered with compressed coursework or modules within the terms, the school may adopt a policy of setting the date based on the add/drop date of the last class in which the student enrolls, or is expected to enroll, for the term. In this circumstance, the school must take into account all adjustments to the enrollment status, both increases and decreases, up to the add/drop date of the student's last class.

If a school doesn't establish a policy for recalculation within a term, a student who begins attendance in all classes would be paid based on the initial calculation, even if his or her enrollment status changes before the disbursement is made.

If the student withdraws from all of his or her classes (or doesn't begin attending any classes), you must follow the procedures discussed in Volume 5.

Change in cost of attendance (recalculation required if you are recalculating for an enrollment status change; otherwise optional)

You're not required to recalculate Pell awards for cost changes during the award year. For instance, if the student gets accepted into on-campus housing after the fall term and your student budget for on-campus housing is lower, you're not required to recalculate the student's Pell award. If you choose to recalculate for changes in costs, you have to consistently apply that recalculation policy.

If you recalculate a Pell award because the student's enrollment status has changed, you must also take into account any changes in the student's costs at that time. For example, if a student enrolls full-time for the first semester and then drops to less than 1/2-time during that semester, the student's costs will change, because only certain cost components are allowed for less than 1/2-time students. If your school's policy is to recalculate for the enrollment change, you must use the cost for a less-than-half-time student *for a full year* to calculate the student's less-than-half-time award. You must not combine the two costs or average them.

COA changes between payment periods

A school may have a policy of recalculating awards when the cost of attendance changes from one payment period to the next—for example, because of changes to the student's tuition and fee costs, or because a student's living situation changes (such as when a student moves off campus). Schools also have the option to establish a policy to recalculate financial aid awards when a student's costs change *within* an award year, as long as the recalculation policy is carried out for all students whose costs change.

COA changes within a payment period

You may establish a policy of recalculating for cost changes from one payment period to the next, and at the same time, have a policy not to recalculate for cost changes *within* a payment period. You also have the option to establish a policy to recalculate financial aid awards when a student's costs change within a payment period. For instance, if a student with no dependents moves from a dormitory to off-campus housing at midterm, the school may wish to recalculate the student's award for that payment period.

For Pell purposes, such a policy is acceptable if its carried out for all students whose costs change within the payment period.

You may not recalculate the payment for a payment period that took place *before* the cost change. For instance, in the example above, if the student lives in the dormitory during the first quarter and then moves off campus for the second and third quarters, the recalculation would only affect the payments for the second and third quarters.

SAR/ISIR with different EFC

If you receive a SAR or ISIR with an EFC different from the one you used for the payment calculation, you must first decide which document is valid. If the new information is the valid information, in most cases you must recalculate the student's Pell award for the entire award year based on the new EFC.

Enrollment change: required recalculation example

Edmund registers for a full-time course load (15 credit hours), and Hart University makes a first-term disbursement on that basis 10 days before the term starts. When the term starts, Edmund only begins attendance in three classes (9 credit hours). Hart must recalculate Edmund's Pell award based on the lower enrollment status. Any difference between the amount Edmund received and his new recalculated award is an overpayment. See Volume 5 for a discussion of overpayments.

Enrollment change within payment period example

Emma registers for a full-time course load at Woodhouse College, and Woodhouse initially calculates a full-time award for her. She begins attending all of her classes but subsequently drops to half-time. Depending on Woodhouse's recalculation policy, Emma may still be paid based on full-time enrollment as long as she's otherwise eligible for payment. On the other hand, if Woodhouse did not receive Emma's first processed SAR or ISIR with an official EFC until after she dropped to half-time enrollment, the Pell initial calculation would be based on her enrollment status at the time the output document was received (half-time).

Tuition and fee charges and recalculation

If the school recalculates a student's Pell Grant due to a change in enrollment status, continuing to charge tuition and fees for credit hours no longer included in the student's enrollment status for Pell Grant purposes does not affect the requirement to recalculate the student's Pell Grant.

For example, Jackie enrolls as a full-time student with 12 credits but never starts attendance in a 3-credit class that starts after the college's "add/drop" date. Jackie's award must be recalculated as three-quarter time even though the college charges tuition for any classes dropped after the "add/drop" date and continues to charge Jackie for 12 credits.

Chapter 3

Appendices:

**APPENDIX A: FORMULA 2: CALCULATIONS FOR
STANDARD TERM PROGRAMS WITH LESS THAN
30 WEEKS IN FALL THROUGH SPRING**

**APPENDIX B: FORMULA 5: CALCULATIONS FOR
CORRESPONDENCE STUDY PROGRAMS**

APPENDIX C: PELL FORMULA SUMMARIES

APPENDIX A

FORMULA 2: CALCULATIONS FOR STANDARD TERM PROGRAMS WITH LESS THAN 30 WEEKS IN FALL THROUGH SPRING

The regulations provide an option for standard-term programs whose fall through spring terms provide less than 30 weeks of instructional time. Formula 2 may be advantageous for your summer term calculations. You may use Formula 2 if the program:

- has an academic calendar that consists of two semesters or trimesters (in the fall through the following spring) or three quarters (in the fall, winter, and spring);
- does not have overlapping terms; or
- measures progress in credit hours and defines full-time enrollment for each term in the award year as at least 12 credit hours.

Using Formula 2

34 CFR 690.63(a)(2), 690.63(c)

Formula 2 Alternative Calculation

Under Formula 2, you can perform the same alternate calculation as performed under Formula 1 if the weeks of instructional time in the defined academic year are the same as the total number of weeks of instructional time in all the terms in the award year. See the example for alternate calculation under the discussion of Formula 1 earlier in this chapter.

Formula 2: calculation for standard terms with Fall through Spring terms < than 30 weeks

The regulations offer an alternative formula for standard term programs with fall through spring standard terms that provide less than 30 weeks of instructional time. The significant effect of this formula is to allow you to pay the same Pell amount for the summer term as you would for one of your traditional fall through spring terms. To use this formula, the program must have two semesters or trimesters (in the fall through the following spring) or three quarters (in the fall, winter, and spring), with no overlapping terms, and define full-time enrollment for each term in the award year as at least 12 credit hours.

Let's take the example of Emma, who is attending Woodhouse College (WHC), which has fall and spring semesters of 14 and 15 weeks, and a summer term of 10 weeks. WHC defines the academic year of Emma's program as 24 semester hours and 30 weeks.* Her Scheduled Award is \$3,300, and she is attending as a full-time student. Because the fall and spring terms provide less than the minimum 30 weeks of instructional time for an academic year, Emma's full-time award is prorated as follows:

$$\frac{29 \text{ weeks* in term**}}{30 \text{ weeks* in academic year}} \times \$3,300 = \$3,190$$

This prorated amount is then divided by the number of terms:

$$\frac{\$3,190}{2} = \$1,595$$

Emma will receive \$3,190 for her attendance in both semesters. Note that this is less than her Scheduled Award; she may be able to receive the remaining \$110 if she enrolls in a summer term.

The difference between Formula 2 and Formula 3 lies in whether you must make a separate calculation for each term. Under Formula 2, you do not have to perform a separate calculation based on the length of each term. Emma's Pell eligibility as a full-time student would be \$1,595 under Formula 2. If Woodhouse used Formula 3, the annual award would be prorated based on the length of each term: 14 weeks (14/30), 15 weeks (15/30), and 10 weeks (10/30), and Emma's eligibility would be \$1,540, \$1,650, and \$1,100 respectively.

Emma only has \$110 in remaining Pell eligibility for the summer term under both formulas. Her summer payment would only be different for each formula if Woodhouse chose to pay the summer term out of the subsequent award year. (Note that Emma's Scheduled Award and her summer payment would then be based on the EFC for the following award year.)

*These fractions use weeks of instructional time as defined in Chapter 1, which are not necessarily the same number as the calendar weeks in an academic year.

**Fall through spring.

APPENDIX B

FORMULA 5: CALCULATIONS FOR CORRESPONDENCE STUDY PROGRAMS

Students enrolled in correspondence courses are eligible for aid under FSA programs only if the courses are part of a program leading to an associate, a bachelor's, or a graduate degree. Also, to be eligible, a correspondence program must meet the criteria for an eligible program (see the Volume 2 of the *FSA Handbook: Institutional Eligibility and Participation*).

PELL COST OF ATTENDANCE

The cost of attendance for correspondence programs is limited to tuition and fees, and in certain cases, books and supplies. Traditionally, books and supplies have been included as part of the correspondence program's tuition. If books and supplies are not included in the program's tuition, they may be counted as costs, for either a residential or nonresidential period of enrollment. As always, the cost of attendance must be based on the costs for a full-time student for a full academic year for the relevant component (for correspondence COA, there would be no room and board, etc.). If the student's program or period of enrollment, as measured in credit hours, is longer or shorter than an academic year as measured in credit hours, the tuition and fees for the program or enrollment period must be prorated. Because the correspondence study cost of attendance for the nonresidential component only includes costs associated with credit hours, your school always uses the credit hour-related fraction to prorate the cost of attendance as follows (because there are no costs associated with weeks of instructional time in the correspondence cost of attendance, your school has to prorate the cost only if the number of hours in the program is shorter or longer than in an academic year):

Credit hours in program's definition of an academic year

Credit hours to which the costs apply

The resulting amount is the full-time, full-academic-year cost used for calculating Pell Grant eligibility. When there is a residential portion in a correspondence student's program, Formula 3 or 4 (whichever applies) is used to calculate the student's payment for a payment period for a residential portion. Refer to Formula 3 or 4 guidelines, including cost of attendance determinations, for this circumstance.

PELL ENROLLMENT STATUS

Students enrolled in programs of correspondence study are considered to be no more than half-time students, even if they're enrolled in enough coursework to be full-time. However, if the correspondence study is combined with regular coursework, the student's enrollment status might be more than half time.

Correspondence program highlights

- Pell cost of attendance limited to tuition and fees (and in some cases, books and supplies)
- The enrollment status for correspondence students can never be more than 1/2-time
- The enrollment status for a student who is taking both correspondence and regular coursework may be greater than 1/2-time
- Timing of payments within payment periods is different for correspondence students
- Formula 5A or 5B used to calculate awards for correspondence students

Enrollment status cites for correspondence

Term classes — 34 CFR 690.66(c)(2)

Combined with regular study — 34 CFR 690.8

Academic coursework

The term academic coursework does not necessarily refer to credits. If a student does not earn any credits until the end of the program, it may refer to the lessons or other measures of learning within a course or a program. For instance, if a course or program is made up of 40 equal lessons, the student reaches the halfway point as follows:

- If the student successfully completes the first 20 lessons before the calendar midpoint of the academic year, the second payment period does not begin until the calendar midpoint.
- If the student completes the first half of the academic year before successfully completing the first 20 lessons, the second payment period does not begin until the student successfully completes the first 20 lessons.

Annual award

The annual award for a student in a nonterm correspondence program is always taken from the half-time Disbursement Schedule because a correspondence student can't receive more than half a Scheduled Award. For a student in a term correspondence program, the annual award is determined from the half-time Disbursement Schedule or the less-than-half-time Disbursement Schedule, as appropriate.

34 CFR 690.66(a)(1) and (2)

A student enrolled only in a nonterm correspondence program always has his or her award calculated based on the half-time Disbursement Schedule. For a student enrolled in a term-based correspondence program, your school must determine whether the student is enrolled half time (6 or more credit hours in a term) or less than half time (less than 6 credit hours in a term). Special rules are used to determine the student's enrollment status when the student is enrolled in a combination of regular and correspondence coursework.

PAYMENT PERIODS & TIMING OF PAYMENTS

For a *nonterm* correspondence program, there must be two equal payment periods in each academic year. Each payment period is the lesser of half the academic year or half the program (measured in credit hours). In addition, you can't disburse a Pell payment for the first payment period until the student has completed 25% of the work in the academic year or the program, whichever is shorter. It can't make the second payment until the student has completed 75% of the work in the academic year or program.

For a *term*-based correspondence program, as for other term-based programs, the payment period is the term. However, you can't disburse the Pell for a payment period until the student has completed 50% of the lessons or completes 50% of the work for the term, whichever is later.

If the correspondence program has a required period of *residential training*, you must treat the residential training as an additional payment period and determine the payment for that payment period using either Formula 3 or Formula 4. Note that the correspondence portion of the program is still treated as a separate portion of the program that's divided into two equal payment periods.

PELL CALCULATIONS IN CORRESPONDENCE PROGRAMS

Formula 5 is used for students enrolled only in correspondence courses (not including residential components of correspondence programs). There are two versions of Formula 5: Formula 5A (which is similar to Formula 4) is used for nonterm programs, and Formula 5B (which is similar to Formula 3) is used for term-based programs. For a residential component of a correspondence program, your school must use either Formula 3 or Formula 4. If the residential component is a term, your school uses Formula 3; otherwise, it uses Formula 4.

For nonterm correspondence programs, this step of the calculation is similar to the step under Formula 4. For term correspondence programs, this step is the same as under Formula 3.

For the Pell calculation, you are required to determine the number of weeks of instructional time in the program by preparing a written schedule for the lessons that the student will submit. A nonterm correspondence program must require at least 12 hours of preparation per week. A term-based correspondence program must

Correspondence Payment Periods Cites

Nonterm — 34 CFR 690.66(b)

Term — 34 CFR 690.66(c)(3),(c)(4)

require at least 30 hours of preparation per semester hour or at least 20 hours of preparation per quarter hour during the term.

Nonterm correspondence program—Formula 5A

You first multiply the annual award (taken from the half-time disbursement schedule) by the least of:

$$\frac{\text{Weeks* for a student to complete credit hours in a program}}{\text{Weeks* in program's academic year definition}}$$

or

$$\frac{\text{Weeks* for a student to complete credit hours in academic year}}{\text{Weeks* in program's academic year definition}}$$

or

One

You then multiply the result by the following fraction:

$$\frac{\text{Credit hours in a payment period}}{\text{Credit hours in program's academic year definition}}$$

Term correspondence program—Formula 5B

You multiply the annual award (taken from the half-time or less-than-half-time Disbursement Schedule) by the weeks of instructional time in the term divided by the weeks in the academic year:

$$\frac{\text{Weeks* in term}}{\text{Weeks in program's academic year definition}}$$

A single disbursement for a payment period can never be more than 50% of the annual award. If the resulting amount is more than 50% of the annual award, your school must make the payment in at least two disbursements in that payment period. You may not disburse an amount that exceeds 50% of the annual award until the student has completed the period of time in the payment period that equals 50% of the weeks of instructional time in the program's academic year definition.

*Note: The fractions on this page use weeks of instructional time as defined in Chapter 1, which are not necessarily the same number as the calendar weeks in an academic year.

Correspondence Multiple Formulas Exception

If a correspondence student has one or more payment periods in an award year that contain only correspondence study and one or more payment periods in the same award year that contain a residential portion, your school would use two different formulas for determining a student's payment for each payment period. This instance is the only one in which a school would use two different Pell formulas within the same award year for students in the same program.

APPENDIX C

FORMULA SUMMARIES

Formula 1 Summary

Standard-term, credit-hour programs, with 30 weeks of instructional time (or waiver applies)

- Enrollment for at least 12 credit hours each term required for full-time status
- Program terms don't overlap
- Academic calendar includes 2 semesters/trimesters (fall and spring) or 3 quarters (fall, winter, and spring)
- Fall through spring terms equal at least 30 weeks of instructional time, or at least 26 weeks of instructional time if the program was granted a waiver of the minimum 30-week academic year requirement.

Step 1: Determine Enrollment Status

Full time, three-quarter time, half time, or less than half time

Step 2: Calculate Pell COA

Full time, full academic year costs

Step 3: Determine Annual Award

If the student's enrollment status is full time, the annual award is taken from the full-time Payment Schedule (Scheduled Award). If the student's enrollment status is 3/4 time, 1/2 time, or less than 1/2 time, the annual award is taken from the appropriate part-time Disbursement Schedule.

Step 4: Determine Payment Periods

Payment period is the academic term

Step 5: Calculate Payment for a Payment Period

$$\frac{\text{Annual Award}}{\text{Number of payment periods in the program's academic year definition}}$$

OR

For alternate calculation:

$$\frac{\text{Annual Award}}{\text{Number of terms in the award year}}$$

Formula 2 Summary

Standard-term, credit-hour programs, with fewer than 30 weeks of instructional time, and waiver does not apply

- Enrollment for at least 12 credit hours each term required for full-time status
- Program terms don't overlap
- Academic calendar includes 2 semesters/trimesters (fall and spring) or 3 quarters (fall, winter, and spring)
- Fall through spring terms are less than 30 weeks of instructional time

Step 1: Determine Enrollment Status

Full time, three-quarter time, half time, or less than half time

Step 2: Calculate Pell COA

Full time, full academic year costs

Cost for fall through spring terms prorated. If fall through spring terms provide the same number of credit hours as are in the academic year definition, prorated COA is the same as non prorated COA.

Step 3: Determine Annual Award

If the student's enrollment status is full time, the annual award is taken from the full-time Payment Schedule (Scheduled Award). If the student's enrollment status is 3/4 time, 1/2 time, or less than 1/2 time, the annual award is taken from the appropriate part-time Disbursement Schedule.

Step 4: Determine Payment Periods

Payment period is the academic term

Step 5: Calculate Payment for a Payment Period

$$\frac{\text{Annual Award}}{\text{Number of payment periods in the program's academic year definition}}$$

OR

For alternate calculation:

$$\frac{\text{Annual Award}}{\text{Number of terms in the award year}}$$

Formula 3 Summary

Any term-based, credit-hour programs; may include those qualifying for Formulas 1 and 2

Step 1: Determine Enrollment Status

Full time, three-quarter time, half time, or less than half time

Step 2: Calculate Pell COA

Full time, full academic year costs

Cost for program or period not equal to academic year prorated. Two fractions are compared:

$$\frac{\text{Hours in program's definition of academic year}}{\text{Hours to which the costs apply}}$$

$$\frac{\text{Weeks of instructional time in program's definition of academic year}}{\text{Weeks of instructional time in the enrollment period to which the costs apply}}$$

The entire cost is multiplied by the lesser of the two fractions to determine Pell COA.

Step 3: Determine Annual Award

If the student's enrollment status is full time, the annual award is taken from the full-time Payment Schedule (Scheduled Award). If the student's enrollment status is 3/4 time, 1/2 time, or less than 1/2 time, the annual award is taken from the appropriate part-time Disbursement Schedule.

Step 4: Determine Payment Periods

Payment period is the academic term

Step 5: Calculate Payment for a Payment Period

$$\frac{\text{Weeks of instructional time in the term}}{\text{Weeks of instructional time in the program's academic year definition}}$$

A single disbursement can't exceed 50% of the annual award

Formula 4 Summary

Clock-hour programs and credit-hour programs without terms, residential portion of nonterm correspondence programs.

Step 1: Determine Enrollment Status

At least half time or less than half time

Step 2: Calculate Pell COA

Full time, full academic year costs

Cost for program or period not equal to academic year prorated. Two fractions compared:

$$\frac{\text{Hours in program's definition of academic year}}{\text{Hours to which the costs apply}}$$

$$\frac{\text{Weeks of instructional time in program's definition of academic year}}{\text{Weeks of instructional time in the enrollment period to which the costs apply}}$$

The entire cost is multiplied by the lesser of the two fractions to determine Pell COA.

Step 3: Determine Annual Award

Always taken from full-time Payment Schedule (equal to Scheduled Award)

Step 4: Determine Payment Periods

Length of payment period measured in credit or clock hours. Minimum of 2 equal payment periods required for programs shorter than an academic year, or 2 equal payment periods in each full academic year (or final portion longer than half an academic year) for programs longer than or equal to an academic year.

Step 5: Calculate Payment for a Payment Period

Annual award is multiplied by two fractions:

$$1) \quad \frac{\text{Weeks of instructional time for a full-time student to complete hours in program}}{\text{Weeks of instructional time in program's academic year definition}}$$

OR

$$\frac{\text{Weeks of instructional time for a full-time student to complete hours in academic year}}{\text{Weeks of instructional time in program's academic year definition}}$$

OR

One (1)

2) The results of the first multiplication are multiplied by:

$$\frac{\text{Clock/credit hours in payment period}}{\text{Clock/credit hours in program's academic year definition}}$$

A single disbursement cannot exceed 50% of the annual award. A minimum of 26 weeks of instruction is needed to meet the minimum academic year definition requirements (versus 30 for credit-hour programs).

Formula 5A Summary

Correspondence programs nonterm correspondence component. For residential portion, use formula 4 to calculate payment periods and amounts. The schedule for the submission of lessons must reflect a workload of at least 12 hours of preparation per week of instructional time.

Step 1: Determine Enrollment Status

Enrollment status is never more than half time

Step 2: Calculate Pell COA

Full time, full academic year costs (for applicable components)

Cost for program or enrollment period not equal to academic year prorated according to the following formula:

For tuition and fees:

$$\text{Costs} \times \frac{\text{Credit hours in program's definition of academic year}}{\text{Credit hours to which costs apply}}$$

Step 3: Determine Annual Award

Annual award taken from half-time Disbursement Schedule

Step 4: Determine Payment Periods

Length of payment period measured in credit hours.

The first payment period is the period of time in which the student completes the lesser of the first half of the academic year or the first half of the program. (First payment can be made only after the student has completed 25% of the lessons or otherwise completed 25% of the work scheduled, whichever comes last.)

The second payment period is the period of time in which the student completes the lesser of the second half of the academic year or the second half of the program. (Second payment may be made only after the student has submitted 75% of the lessons or otherwise completed 75% of the work scheduled, whichever comes last.)

Step 5: Calculate Payment for a Payment Period

Annual award is multiplied by two fractions:

$$1) \quad \frac{\text{Weeks of instructional time for a full-time student to complete credit hours in program}}{\text{Weeks of instructional time in program's academic year definition}}$$

OR

$$\frac{\text{Weeks of instructional time for a full-time student to complete credit hours in academic year}}{\text{Weeks of instructional time in program's academic year definition}}$$

OR

One (1)

2) The results of the first multiplication are multiplied by:

$$\frac{\text{Credit hours in payment period}}{\text{Credit hours in program's academic year definition}}$$

Note: A single disbursement can't exceed 50% of the annual award.

Formula 5B Summary

Programs of study by correspondence, term correspondence component. During each term, the written schedule for the submission of lessons must reflect a workload of at least 30 hours of preparation per semester hour or at least 20 hours of preparation per quarter hour.

Step 1: Determine Enrollment Status

Enrollment status is never more than half time

Step 2: Calculate Pell COA

Full time, full academic year costs (for applicable components)

Cost for program or enrollment period not equal to academic year prorated according to the following formula:

For tuition and fees:

$$\text{Costs} \times \frac{\text{Credit hours in program's definition of academic year}}{\text{Credit hours to which costs apply}}$$

Step 3: Determine Annual Award

Annual award taken from half-time or less than half time Disbursement Schedule

Step 4: Determine Payment Periods

Length of payment period is the academic term.

Step 5: Calculate Payment for a Payment Period

Annual award multiplied by:

$$\frac{\text{Weeks of instructional time in the term}}{\text{Weeks of instructional time in program's academic year definition}}$$

When there is a residential portion in a term-based correspondence program, Formula 3 is used to calculate the student's payment for a payment period for the residential portion.

A single disbursement cannot exceed 50% of the annual award.

Calculating ACG and National SMART Grants

CHAPTER 4

In this Chapter we will illustrate the amounts a student may receive under the ACG and National SMART Grant programs and show how to determine the correct grant award for each payment period. While these programs share some requirements, they are two separate programs with a number of different requirements. For more detail on ACG and National SMART Grant criteria and eligibility, see Volume 1, Student Eligibility. For more on payment periods, see Chapter 1 of this volume, and for cost of attendance, see Chapter 3 of this volume.

In general, a full-time student may be eligible for two ACG Scheduled Awards: one each for the first and second academic years of the student's enrollment in any ACG-eligible program. A full-time student may be eligible for two National SMART Grant Scheduled Awards: one each for the third and fourth academic years of the student's enrollment in any National SMART Grant-eligible program. A student may never receive more than two ACG or two National SMART Grant Scheduled Awards throughout the student's undergraduate education.

The rules for calculating an ACG or National SMART Grant disbursement for a payment period are identical to the Pell calculations we described in the previous chapter. Like Pell, ACGs and National SMART Grants use a Scheduled Award. However, there are key differences between the Scheduled Award for ACGs and National SMART Grants and the Scheduled Award for Pell. A student's ACG or National SMART Grant Scheduled Award is based only on completing the respective academic year of the student's ACG or National SMART Grant-eligible program.

However, a Pell Scheduled Award is for completing an academic year within an award year. For instance, a student who enrolls in the spring of one year could receive the first half of an ACG Scheduled Award for an academic year in that term and the second half of the ACG Scheduled Award for that academic year in the following fall term, even though the terms take place in two different award years.

The maximum ACG or National SMART Scheduled Award for a particular student depends on the academic year in which the student is enrolled during the student's undergraduate education in eligible programs of study and the availability of funds for all eligible students during the award year. For the ACG Program, the Scheduled Award may be up to the authorized maximum awards of:

- \$750 during the first academic year that an eligible student is enrolled in any ACG eligible program at any school; and

Chapter 4 Highlights

- Academic year definition
- Academic year progression for all eligible programs
- Academic year progression for programs eligible to calculate payments under Formula 1
- Calculating an ACG/National SMART Grant for a payment period
- Summer/Crossover periods
- Transfer Students

Academic Year

Higher Education Act; Section 481(a)
34 CFR 668.3

Annual establishment of ACG/National SMART Grant maximum Scheduled Awards

34 CFR 691.2(d)
34 CFR 691.62

ACG and National SMART Grant Scheduled Awards will be established for each award year based on the available funding. The Department has determined for the 2007-2008 award year, that the Scheduled Awards will not need to be reduced from the authorized maximum awards.

ACG and National SMART Grant Eligible Programs

For ACGs, an eligible program must meet the FSA eligible program requirements and lead to an associate's degree or a bachelor's degree; be a two-academic-year program acceptable for full credit toward a bachelor's degree; or be a graduate degree program that includes at least 3 academic years of undergraduate education. For National SMART Grants, an eligible program must meet the FSA eligible program requirements and lead to a bachelor's degree in an eligible major or be a graduate degree program in an eligible major that includes at least 3 academic years of undergraduate education.

The eligible program differences may affect the award for which a student qualifies. For example, it is possible for a student to complete two academic years in an ACG-eligible program but not immediately qualify as being in the third academic year of a National SMART Grant eligible program. In this case, a student declares a National SMART Grant eligible major at the end of the student's second academic year. The student's school performs a degree audit at that time and determines that only 36 semester hours from the prior two years apply towards the student's National SMART Grant eligible program. As a result, the student is considered to be enrolled in the second year of the National SMART Grant-eligible program and is not yet eligible for a National SMART Grant. We will discuss additional considerations related to this issue later in this chapter.

- \$1,300 during the second academic year that an eligible student is enrolled in any ACG eligible program at any school.

For the National SMART Grant Program, the Scheduled Award may be up to the authorized maximum awards of:

- \$4,000 during the third academic year that an eligible student is enrolled in any National SMART Grant eligible program at any school; and
- \$4,000 during the fourth academic year that an eligible student is enrolled in any National SMART Grant eligible program at any school.

Generally, once a student completes an academic year in an ACG or National SMART Grant eligible program, the student may never receive an ACG or National SMART Grant for that academic year. This requirement is applicable regardless of whether the student received any portion of the award during that academic year. For example, a student completes her second academic year in an ACG eligible program going only part-time. Since a student must be enrolled full-time to be eligible for ACG (or National SMART Grant), she was not eligible for an ACG during her second academic year and never will be eligible for a second-year ACG award. While this principle is generally true, there are considerations that may affect its implementation discussed later in this chapter.

ACADEMIC YEAR PROGRESSION: GENERAL REQUIREMENTS

For purposes of ACGs and National SMART Grants, a student's academic year progression is not based on the student's enrollment in each ACG- or National SMART Grant-eligible program separately, but rather is based on all ACG- and National SMART Grant-eligible programs in which a student has enrolled over the course of the student's undergraduate education.

Academic year

Your school must define the academic year in weeks of instruction and credit or clock hours for each eligible program for which you intend to award ACGs or National SMART Grants. The definition must meet the minimum FSA standards and be the same one used for all other FSA programs. See Chapter 1 of this volume for more on academic year.

To determine the ACG or National SMART Grant Scheduled Award for which a student is eligible, you need to determine how many academic years the student has completed while attending an ACG or National SMART Grant eligible program of study. Generally, to do this, one compares the academic year definition for a student's program of study to the number of credit or clock hours earned by the student and the weeks of instruction attended by the student in ACG-

Academic Year Progression

34 CFR 691.6
DCL GEN-06-18

Case Studies

For detailed case studies on academic year progression see Appendix A to this chapter, posted on the same webpage as Vol. 3 on IFAP.

eligible programs or in National SMART Grant-eligible programs. Remember, for a student to progress from one academic year to the next, a student must complete the minimum number of credit or clock hours AND the minimum number of weeks of instruction in the academic year.

Academic year progression for all eligible programs: exact accounting

In general, a school determines a student's academic year progression during the student's attendance for the first and second academic years in ACG-eligible programs at all schools. Similarly, a school determines a student's academic year progression during the student's attendance for the third and fourth academic years in National SMART Grant-eligible programs at all schools.

Thus, a student's academic year progression is not based on the student's enrollment in each eligible program separately, but rather it is based on all eligible programs in which a student has enrolled over the course of the student's undergraduate education.

A school must determine whether a student's previous enrollment, as measured in both weeks of instruction and credit or clock hours, affects the student's eligibility for an ACG and National SMART Grant in an academic year. For example, a student completes 24 semester hours over three 15-week semesters enrolled in an ACG-eligible program at a school by attending full-time one term and half-time for two terms. Over the three semesters the student has thus completed the 24 semester hours and 30 weeks of instruction of her first academic year. Even though she attended on a full-time basis for only one of the semesters and received only half of the first-year ACG, the student is no longer eligible as a first-year student at any school since the student has completed both the hours and weeks of instruction of the first academic year of enrollment in an ACG-eligible program. Thus, the student would never be eligible to receive the second half of the first-year ACG.

In determining the credit or clock hours of an academic year completed, a school must use the number of credit or clock hours earned by a student at that school or at any other postsecondary schools if those credit or clock hours will be accepted to meet a part of the requirements for the student's ACG- or National SMART Grant-eligible program.

Credits or clock hours earned by a student based on, for example, Advanced Placement (AP) coursework or tests, International Baccalaureate (IB) coursework or tests, testing out, life experiences, or enrollment in an ineligible program or as a nonregular student, must also be included in determining progression in the credit or clock hour component of the academic year if the school uses those credits or clock hours to meet a part of the requirements of the student's eligible program. However, there are no weeks of instruction associated with receiving these credits or clock hours.

Rate of Progression

It is possible for a student to be starting one measure of a new academic year in hours or weeks of instruction while completing the other measure for the prior academic year. For example, Diane attends 18 semester hours per 15-week semester for 4 semesters in a program with an academic year of 24 semester hours and 30 weeks of instruction. At the end of the fourth semester she has accrued the 72 semester hours, thus completing the hours for three academic years. However, while she has completed the hours of three academic years, under an exact accounting, she is considered to be entering the third academic year because she has only attended 60 weeks of instruction. Thus, when she begins her fifth semester, she will begin the hours of a fourth academic year, but the weeks of instruction of her third academic year. In her fifth semester she is considered to be in her third academic year. Remember, when tracking academic year progression for the ACG and National SMART Grant programs, you are tracking progression through the defined academic year in weeks of instruction and hours rather than grade level.

Hours without Weeks

When performing an exact accounting of a student's academic year progression, credits or clock-hours for Advanced Placement (AP) coursework or tests, International Baccalaureate (IB) coursework or tests, testing out, life experiences, enrollment in an ineligible program or as a nonregular student do not have weeks of instruction associated with them. For instance, if a student initially enrolls with more than one academic year of these credits, the student would still be placed in the first academic year because the credits carry no weeks of instruction.

Academic year progression for programs eligible to use Formula 1: assumption method (applicable only to the 2006-2007 and 2007-2008 award years)

Applicable only for the 2006-2007 and 2007-2008 award years, the Secretary provided guidance in Dear Colleague letter GEN-06-18 governing ACG- and National SMART Grant-eligible programs for which a school may calculate payments for payment periods under Formula 1.

Unlike schools with nonterm and nonstandard term programs, schools with programs qualifying for Formula 1 payment calculations have not generally had to monitor their students' completion of the weeks of instruction and credit hours of an FSA academic year. This guidance was intended to relieve these schools' administrative burden during the two initial award years of implementing the ACG and National SMART Grant programs.

Under this guidance, a school is not required to do an exact accounting of a student's academic year progression and may assume that a student has completed the weeks of instruction in the academic year for each increment of the student's credit hours in the academic year. For example, a student who completed 24 semester hours is considered to also have completed 30 weeks of instruction for a program with an academic year of 24 semester hours and 30 weeks of instruction.

In making this determination under the assumption method, any fractions of an academic year are not rounded to include the next term or academic year. For example, a student who completed 27 semester hours is considered to also have completed 33.75 weeks of instruction for a program with an academic year of 24 semester hours and 30 weeks of instruction ($27 \text{ hours earned} \times 30 \text{ weeks of instruction in academic year} / 24 \text{ hours in academic year}$).

A school need not consider whether the credits were earned while enrolled in an ACG- or National SMART Grant-eligible program or were credits earned by a student from AP coursework or tests, IB coursework or tests, testing out, life experiences, or enrollment in an ineligible program or as a nonregular student.

A school may use the assumption method on a student-by-student basis, for the same student for different terms, or for transfer credits but not credits subsequently earned at the school.

Student request for an exact accounting

A school using the assumption method must provide an exact accounting for a student who requests that such a determination be made or who questions whether he or she has completed an academic year.

Degree audits and prior payments

Generally, a school considers all of the hours a student earns to apply to the student's degree program until such time as the school may perform a degree audit to determine the hours that are applicable to the student's degree program. The school is not considered to have erred by relying on the student's progress prior to the degree audit in determining the student's academic year progression for an ACG or National SMART Grant, even though some of the student's prior coursework is no longer considered to be applicable to the student's academic year progression in an ACG or National SMART Grant eligible program.

Based on a degree audit a student may be reclassified to an academic year prior to an academic year for which the student has received payment. The student is not required to return awards for any academic year subsequent to the student's reclassified standing in this circumstance. However, the student may not regain eligibility for any academic year prior to a year for which payment has been received since the student is considered to have completed the academic years in an eligible program through the years for which payment has been received.

Degree Audits and Prior Payments

Once a student receives an award for a particular academic year, the student's eligibility in the earlier years is considered to have elapsed since eligibility is based on attendance in all eligible programs at all schools. For example, Anthony received a third-year National SMART Grant award. A degree audit at the end of his third academic year determined that he only has applicable credits to be in the second academic year of his National SMART Grant-eligible degree program. While there is no repayment of the third-year award, Anthony does not become eligible for a fourth-year National SMART Grant until he has completed the necessary additional credit hours and weeks of instruction of at least 3 academic years in his National SMART Grant-eligible program. Since a student cannot go back to academic years prior to a year for which the student received a disbursement, Anthony cannot be considered a second-year student eligible for his remaining ACG eligibility since the second academic year of an ACG-eligible program must be considered to have elapsed by his receipt of a third-academic-year National SMART Grant.

Determining Academic Year Progression				
Payment Formula Used for Eligible Program	Academic Year Based on <i>Actual</i> Weeks of Instruction and Hours	May <i>Assume</i> Weeks Based on Hours (2006-07 and 2007-08)	May <i>Assume</i> Weeks Based on Accepted Hours for Transfer Students	Must Determine <i>Actual</i> Academic Year Standing if Student Requests
Formula 1	Yes	Yes	Yes	Yes
Formula 3, but eligible to use Formula 1	Yes	Yes	Yes	Yes
Formulas 2, 3 and 4	Yes	No	Yes	Yes, for transfer students

ACADEMIC YEAR PROGRESSION: ADDITIONAL CONSIDERATIONS

Transfer students

Preamble, November 1, 2006 final regulations (71 FR 64404-64405)
34 CFR 691.65

Transfer students

A school is responsible for determining whether any previous enrollment by a student as measured in weeks of instruction and hours affects the student's eligibility for an academic year. A school may always document a student's attendance in ACG- and National SMART Grant eligible programs at all the schools a transfer student attended to do an exact accounting of the student's academic year progression. An exact accounting is always considered the best method of determining a student's academic year progression.

In addition, any school may assume a transfer student's academic year progression in weeks of instruction based on the credits accepted on transfer into an ACG- or National SMART Grant-eligible program in lieu of performing an exact accounting of a transfer student's academic year progression in ACG- and National SMART Grant-eligible programs at other schools. However, a school must provide an exact accounting for a student who requests that such a determination be made or who questions whether he or she has completed an academic year.

Generally, to the extent a determination does not conflict with information related to grants previously received, when determining the appropriate academic year for a transfer student, the school may rely on the transfer credits accepted, along with the estimated number of weeks of instruction completed in proportion to the academic year of the student's ACG- or National SMART Grant eligible program at the school to which the student transferred. To determine the estimated number of weeks of instruction, the school may use the following formula:

$$\frac{\text{hours accepted on transfer} * \text{weeks of instruction in academic year}}{\text{hours in academic year}}$$

Note that any fractions of an academic year are not rounded to include the next term or academic year.

A student may have previously received an ACG or National SMART Grant for an academic year, or a portion of one. The student's school must consider the student to have completed an eligible program through that academic year, or that portion of an academic year, in weeks of instruction and hours, unless the school has information to the contrary.

However, a school may not be aware that the student completed an academic year in an ACG- or National SMART Grant-eligible program at another school for which he has been paid or does not have information confirming such completion. In this case, the second school may determine the student's academic year progression based on the credits accepted on transfer and the assumed weeks of

instruction. While we do not require schools to track this information, a school must take it into account if it has the information.

In determining the academic year of a transfer student, you need not follow the same policy as is used for assessing weeks of instruction in the student's program of study at your school. For example, you may assume the weeks of instruction based on a student's transfer credits, but pursue an exact accounting of the student's academic year progression going forward in his or her program at your school.

Summer terms (Formula 1 and 2 programs)

For a program with a single summer term that is eligible to calculate payments using Formula 1 or 2, the current regulations provide that a school may treat the summer term as though it is the same fraction of the weeks of an academic year as the fraction used to calculate a payment for a payment period. To use this option, the school must apply it to all students enrolled in the program unless a student is requesting an exact accounting of his academic year progression.

Under this option, for an eligible program offered in semester hours or trimesters with a single summer term that provides at least 12 semester or trimester hours of coursework, the summer is considered to be one-half of an academic year in weeks of instruction or, if the academic year is defined to include the summer term, one-third of an academic year in weeks of instruction. For an eligible program offered in quarters with a single summer term that provides at least 12 quarter hours of coursework, one-third of an academic year in weeks of instruction or, if the academic year is defined to include the summer term, one-fourth of an academic year in weeks of instruction.

Extension of ACG and National SMART Grant eligibility (applicable only to the 2006-7 and 2007-8 award years)

Generally, a student who has completed the second academic year of an ACG-eligible two-year program is not eligible for an ACG. Similarly, a student who has completed the fourth academic year of a National SMART Grant-eligible program is not eligible for a National SMART Grant.

However, for the 2006-2007 and 2007-2008 award years, we consider a student's second academic year for an ACG or fourth academic year for a National SMART Grant to end when the student has completed the credits required for completion of that academic program, as published in the school's official academic publications. A student may only receive one second-year ACG or one fourth-year National SMART Grant.

For example, a student is enrolled in an associate degree program requiring 60 semester hours to complete. The program has semesters with 15 weeks of instruction and defines its academic year as 24 semester hours and 30 weeks of instruction. The student did not

Summer Terms
34 CFR 691.6

Extension of ACG and National SMART Grant Eligibility
DCL GEN-06-18

receive a Federal Pell Grant while earning 48 semester hours over the first four semesters in her program in the award years prior to the 2007-2008 award year and has not received a second-year ACG award even though the student has a 3.0 GPA for the first academic year of attendance. In her fifth semester in the fall of 2007 she is receiving a Federal Pell Grant and may receive half of her second-year ACG award even though the student has completed the weeks of instruction and credit hours of a second academic year.

Grade level and defining an academic year

Schools often define a program's academic year based on the minimum FSA standards. Traditionally, schools have set a higher standard for grade level progression. For instance, a 4-year baccalaureate program might require 120 semester credits for completion and expect a student to earn 30 credit hours to progress from the first to second grade level. Similarly, a 2-year associate degree program that requires 90 quarter hours for completion might adopt a standard of 45 quarter hours for a student to progress from the first to the second grade level. For Stafford loans, you are already using a grade level progression. Though you are not required to do so, you may find it convenient to define the academic year to the same standard as grade level to facilitate making ACG and National SMART Grant awards. In determining whether to define the hours of your academic year as the same standard as grade-level progression, there are a number of issues you may want to consider such as the following:

- The program's grade level standards need to be in equal increments since you must use the same academic year definition across all academic years of the program.
- An individual student's eligibility for a grant may be affected by adopting a different standard. A student's eligibility for the next academic year's award may be delayed by redefining the academic year in hours to coincide with grade-level increments rather than retaining a definition in accordance with the minimum standards.
- The academic year definition affects the determinations of enrollment status for nonterm programs and programs with nonstandard terms. It does not affect the definition of full-time enrollment status for semesters, trimesters, and quarters where full-time must be defined as not less than 12 semester or quarter hours.
- The academic year is also used for FFEL/DL loan proration (the denominator in the loan proration fraction is the number of credit hours in the school's academic year definition). If you change the hours of your academic year definition from 24 semester hours to 30 semester hours, then you must also change the denominator for loan proration, which may impact loan eligibility.
- Grade level may still not synchronize with an individual student's academic year progression depending on an individual student's circumstances.

Academic Year Progression and Grade Level examples

Example 1

Sophia enrolls in Chernivtsi Institute as a full-time student taking 12 semester hours in both the fall and spring semester hours and receives a first-year ACG. Chernivtsi defined the hours component of its academic year to match its 30-semester-hour grade level increments. When Sophia enrolls for 12 hours in the fall term, she will not be eligible for a second-year ACG since she will not have completed the 30 semester hours of the first academic year even though she has completed the 30 weeks of instruction in the first academic year. In her second spring term, she is at second year grade level and is also starting her second academic year. She enrolls full-time and is eligible for a second-year ACG award since she has a 3.1 GPA for the 36 hours of coursework completed in the three previous terms that constituted completing her first academic year.

Example 2

Jackie initially enrolls in Rock Creek College as a full-time student taking 15 semester hours in the fall and spring terms in a 120-hour biology degree program. She also has 30 credits from an ACG-ineligible program upon enrollment. Rock Creek defines its academic year as 30 semester hours and 30 weeks of instruction; the 30 hours match its grade level increments. In determining ACG and National SMART Grant eligibility, the College does an exact accounting of Jackie's academic year progression. For the first two terms, although she is classified as a sophomore, she is eligible for a first-year ACG award since her transfer credits have no weeks associated with them. At the beginning of her second fall term, she is a junior but receives a second-year ACG award. For her last two terms, she is a senior but receives her third-year National SMART Grant.

Grade Level and Defining an Academic Year examples

Example 1

Potter Lake College defines the academic year of Pamela's eligible program as 24 semester hours for progression from one academic year to the next across the program. The college is considering defining its academic year to match the college's grade level policy. However, the college defines grade level 2 as having completed 30 semester hours and grade level 3 as having completed 66 semester hours. Since a defined academic year for a program always has the same number of hours and the grade level increments are not equal, the College cannot define academic year to coincide with grade levels.

Example 2

McCreery College offers a program with an academic calendar of fall and spring semesters, each 14 and 16 weeks of instruction in length respectively, and a summer term of 6 weeks of instruction. McCreery must use Formula 3 to calculate payments since the college defines full-time for the summer term as less than 12 semester hours since the school uses the minimum allowed enrollment status for the summer term. If McCreery changes its academic year from the minimum 24 semester hours to 30 semester hours to match grade-level progression, the minimum full-time standard for the summer term would change from 5 semester hours to 6 semester hours. The change in the academic year definition would not change the full-time enrollment status of 12 semester hours for the semesters.

Hours without weeks

There are several additional considerations in the treatment of “credits without weeks” such as those awarded for AP coursework or tests, IB coursework or tests, testing out, life experiences, or enrollment in an ineligible program or as a nonregular student, because these credits generally carry no weeks of instruction and some categories of these credits can’t be used to calculate the required GPA.

Generally, under an exact accounting, a student’s academic year progression will lag behind the student’s credit or clock hours if these hours include hours without weeks. For example, a student entering college with 24 semester hours of AP credits may have completed the hours necessary for the first academic year but would not have the weeks of instruction for the first academic year. The student would, therefore, be considered a first-year student.

Under the assumption method of determining academic year progression for Formula 1-eligible programs for the 2006-2007 and 2007-2008 award years, a student would be considered to have completed weeks of instruction proportional to these credits.

Under the assumptions method, while credits from enrollment in an ineligible program or as a nonregular student generally will have grades, for credits without weeks based on AP coursework or tests, IB coursework or tests, testing out, or life experiences, there are no grades. If a student has an academic year of credits from these sources and thus also was considered to have the first academic year of weeks of instruction, the student would still not have a GPA to qualify for a second-year ACG award.

Similarly, if a student brought two academic years of credits from these sources to a National SMART Grant-eligible program and thus also was considered to have the two academic years of weeks of instruction, the student would not have a cumulative GPA to qualify for a payment in the student’s first payment period of enrollment in the third academic year. If some or all of the credits without weeks were from enrollment in an ineligible program or as a nonregular student, the school generally would be able to calculate a GPA.

National SMART Grant eligibility and academic year progression

A student’s progression to National SMART Grant eligibility is not dependent on the prior receipt of an ACG award. For example, a student may progress through the first two academic years of his undergraduate education without receiving an ACG award. In his third academic year in an eligible program he may then qualify for a National SMART Grant.

Academic Year and Transfer Credits example

Michelle transfers to Terrapin College with 12 credits accepted on transfer into an ACG-eligible program. She has received all of her first-year ACG Scheduled Award. Terrapin defines its academic year as 24 semester hours and 30 weeks of instruction. Her ISIR shows that she received a first-year Scheduled Award, but Terrapin has no information confirming she completed an academic year while enrolled in an ACG-eligible program because her prior school's transcript does not indicate whether she was enrolled in a degree program. Terrapin, therefore, may consider her to be in her first academic year and not yet eligible for a second academic year ACG Scheduled Award.

However, Michelle challenges this determination and provides Terrapin information confirming her completion of a first academic year in an ACG-eligible program at the prior school. She is now considered to be in her second academic year since academic year progression is generally measured based on attendance in all eligible programs at all schools. Since she has a 3.4 GPA in the 12 hours accepted on transfer, she is eligible for a second-year award in her first term at Terrapin.

Weeks of Instruction and Credits without Weeks examples

Example 1

Eddie graduates from high school in May of 2007 and begins attendance at Shaw College in the fall. Eddie has 25 semester hours of CLEP credit, and Shaw College defines Eddie's program's academic year as 24 semester hours and 30 weeks of instruction.

Shaw's policy is to track actual weeks of instruction to measure a student's academic year progression. Since CLEP credits have neither weeks of instruction nor grades associated with them, even though Eddie has enough credits to complete his 1st academic year, he is still considered to be in his 1st academic year for ACG purposes.

Example 2

Drew graduates from high school in May of 2007 and begins attendance at Woolridge University in the fall. Drew has 45 AP credits, all with a score of 3 or higher. Woolridge defines academic year of Drew's program as 24 semester hours and 30 weeks of instruction.

If Woolridge uses assumed weeks, Drew would have enough credits and weeks to be in his second academic year. However, AP credits do not have a grade associated with them, regardless of their test scores, so Drew cannot receive a second-year ACG, as he did not have a 3.0 or higher GPA in the program at the point he had enough credits to complete his first academic year. Drew is also not able to receive 1st year ACG, as his incoming credits and assumed weeks are sufficient to be considered to have already completed his 1st academic year. If Woolridge chooses to use actual weeks, Drew would be eligible for a 1st year ACG. Woolridge could switch to assumed weeks once Drew has completed his second term, but Drew would then be considered to be in his third academic year and would not be eligible for a second year ACG.

CALCULATING A PAYMENT FOR A PAYMENT PERIOD

Calculating a payment for a payment period

34 CFR 691.63 and 691.76(b)

As previously noted, the requirements for calculating an ACG or National SMART Grant payment for a payment period are exactly the same as Federal Pell Grant program requirements and use the same formulas as the Pell Grant program. ACG and National SMART Grant Formulas 1, 2, 3, and 4 are identical to the corresponding Pell formulas. The school disburses an ACG or National SMART Grant, like Pell, over the hours and weeks of instruction in an eligible program's academic year as defined by the school.

As with Pell Grants, ACG and National SMART Grant Scheduled Awards are divided into at least two payments based on the payment periods in an academic year. The calculation formula you use depends on the academic calendar of a student's eligible program and would be the same formula used to calculate payments of Pell Grants for that academic program. Refer to Chapter 3 of this volume on Pell Grants for a more detailed explanation of these formulas.

A student's payment for a payment period is calculated based on the coursework in the student's ACG or National SMART Grant-eligible program. For a National SMART Grant, the coursework in the payment period may include the courses in the eligible major or other courses that make up the student's eligible program, or both. If a student's payment is calculated based on taking courses in the student's National SMART Grant program without any courses in the student's eligible major, the school ensure that the student's courses are necessary for the student to complete the student's National SMART Grant eligible program, and in the case of a student with a double major, with only one major being a National SMART Grant eligible major, the student's eligible program includes the coursework for both majors as well as the other courses that make up the eligible program.

Packaging

While a student's payment for a payment period is calculated exactly the same way as the student's Federal Pell Grant, unlike Pell, both ACGs and National SMART Grants are reduced to eliminate an overaward. For more details on how to package ACGs and National SMART Grants along with other FSA, see Chapter 7 of this volume.

Remaining eligibility

A student may have remaining eligibility from a Scheduled Award upon completing the academic year for that award, either because the award amounts were reduced in the packaging process to prevent an overaward or because the student was not otherwise eligible to receive a payment in one or more terms (for instance, if the student was enrolled less than full-time or was temporarily ineligible for National SMART Grant due to a low GPA). In such cases, the student generally

may not receive any of the remaining award amount in a subsequent payment period at any school.

Payment period with two academic years

A student may be completing one academic year in credit or clock hours and weeks of instruction while beginning the next academic year during the same payment period. In this circumstance, the Scheduled Award applicable to the payment period is the award for the academic year being completed. No adjustment is made to the payment period calculation; it is calculated as though all of the weeks and hours of the payment period were part of the applicable Scheduled Award's academic year.

Remaining eligibility in a different award year

The payment periods of a student's Scheduled Award for a particular academic year may fall in two different award years. If the amount of the Scheduled Award for an academic year changes between award years based on the funds available for awards, the school must determine the percentage of the Scheduled Award used in the prior award year to determine the percentage of the Scheduled Award that is available in the subsequent award year.

For example, a student receives \$2,000 from a third academic year National SMART Grant Scheduled Award of \$4,000. The student thus has used 50 percent of the third-year Scheduled Award ($\$2,000/\$4,000 = 50\%$). Due to a reduction of the Scheduled Award to \$3,000 in the subsequent award year, the student may only receive 50 percent of the \$3,000 third academic year Scheduled Award in the subsequent award year, or \$1,500.

Transfer student attending more than one school in an academic year

A student may transfer from a school to a second school during an academic year. The second school may pay a grant only for that portion of the academic year of the student's ACG- or National SMART Grant-eligible program in which the student enrolls at the second school. The payments must be adjusted to ensure that the grant does not exceed the student's Scheduled Award for that academic year. A school must take into account any change in the Scheduled Award for that academic year in determining that the student does not receive more than 100 percent of the Scheduled Award.

Payment Period with Two Academic Years Example

Dan attended the fall and spring semesters at Swampoodle University during his first academic year as a three-quarter-time student and earned 18 semester hours.

Swampoodle defines the academic year of Dan's ACG-eligible program as 24 semester hours and 30 weeks of instruction. In his second fall semester, he registers for 12 hours as a full-time student. Although Dan has completed the weeks of instruction of his first academic year, he still needs to complete 6 semester hours of his first academic year.

Swampoodle must, therefore, determine Dan's payment for the second fall term based on his first-year Scheduled Award. Although only 6 semester hours are applicable to the first academic year, Dan receives a full payment of 1/2 of his first academic year ACG Scheduled Award since he has the remaining eligibility.

If Dan had received all of his Scheduled Award in the first two terms, e.g., he registered and was paid for 24 semester hours but did not complete all of those hours, his payment in the second fall term would be zero since he would still be completing his first academic year in that term but would have no remaining eligibility.

Lump sum payments

You may pay a student ACG or National SMART Grant funds in one lump sum for all prior payment periods for which the student was eligible within the same award year. The student must have completed the prior payment period as a full-time student.

Basic Calculation Case: student progress matches academic year progression

Basic Case: Student progress matches academic year progression

Babineaux Community College defines the academic year for Nate's ACG and National SMART Grant eligible program as 24 semester hours and 30 weeks of instruction. The program has fall and spring semester hours, each 15 weeks of instruction in length. Babineaux uses Formula One to calculate payments for payment periods and determines academic year progression based on an exact accounting, i.e., it does not assume weeks of instruction based on hours completed.

In his first year (2007-2008), Nate is enrolled for 12 credits in the fall semester, and 12 credits in the spring semester. He continues this pattern of enrollment for the next several years.

Babineaux awards Nate 1/2 of a first-year ACG Scheduled Award for each of the first and second semester hours during which he completes his first academic year. Similar payments are made for each succeeding semester from his second-year ACG and third- and fourth-year National SMART Grant Scheduled Awards. As long as receiving these amounts would not create an overaward, Nate would receive the full payment amounts for each semester as shown below.

Although for 2007-2008 there is provision for a student to earn National SMART Grant funds after their fourth academic year, students may only ever receive one fourth academic year National SMART Grant, so in Nate's 5th academic year, he is not eligible for further National SMART Grant funds, as he has already received his fourth academic year National SMART Grant.

	Fall		Spring		
2007-2008	12 credit hours	1st half ACG (Year1) \$375	12 credit hours	2nd half ACG (Year1) \$375	24 credits and 30 weeks accumulated, 1st academic year completed
	15 weeks of instructional time		15 weeks of instructional time		
	First academic year				
2008-2009	12 credit hours	1st half ACG (Year2) \$650	12 credit hours	2nd half ACG (Year2) \$650	48 credits and 60 weeks accumulated, 2nd academic year completed
	15 weeks of instructional time		15 weeks of instructional time		
	Second academic year				
2009-2010	12 credit hours	1st half National SMART (Year3) \$2000	12 credit hours	2nd half National SMART (Year3) \$2000	72 credits and 90 weeks accumulated, 3rd academic year completed
	15 weeks of instructional time		15 weeks of instructional time		
	Third academic year				
2010-2011	12 credit hours	1st half National SMART (Year4) \$2000	12 credit hours	2nd half National SMART (Year4) \$2000	96 credits and 90 weeks accumulated, 4th academic year completed
	15 weeks of instructional time		15 weeks of instructional time		
	Fourth academic year				
2011-2012	12 credit hours	No longer National SMART eligible	12 credit hours	No longer National SMART eligible	120 credits and 120 weeks accumulated, 5th academic year and program completed
	15 weeks of instructional time		15 weeks of instructional time		
	Fifth academic year				

Calculation case: assumption method

Gallery Technical Institute (GTI) defines the academic year as 24 semester hours and 30 weeks of instruction for Chuck's National SMART Grant-eligible program. The program has fall and spring semester hours, each 15 weeks of instruction in length, and is 126 credits in length. Gallery uses Formula 1 to calculate payments for payment periods. Under the guidance applicable for the 2006-2007 and 2007-2008 award years in Dear Colleague Letter GEN-06-18, Gallery assumes weeks of instruction based on hours completed.

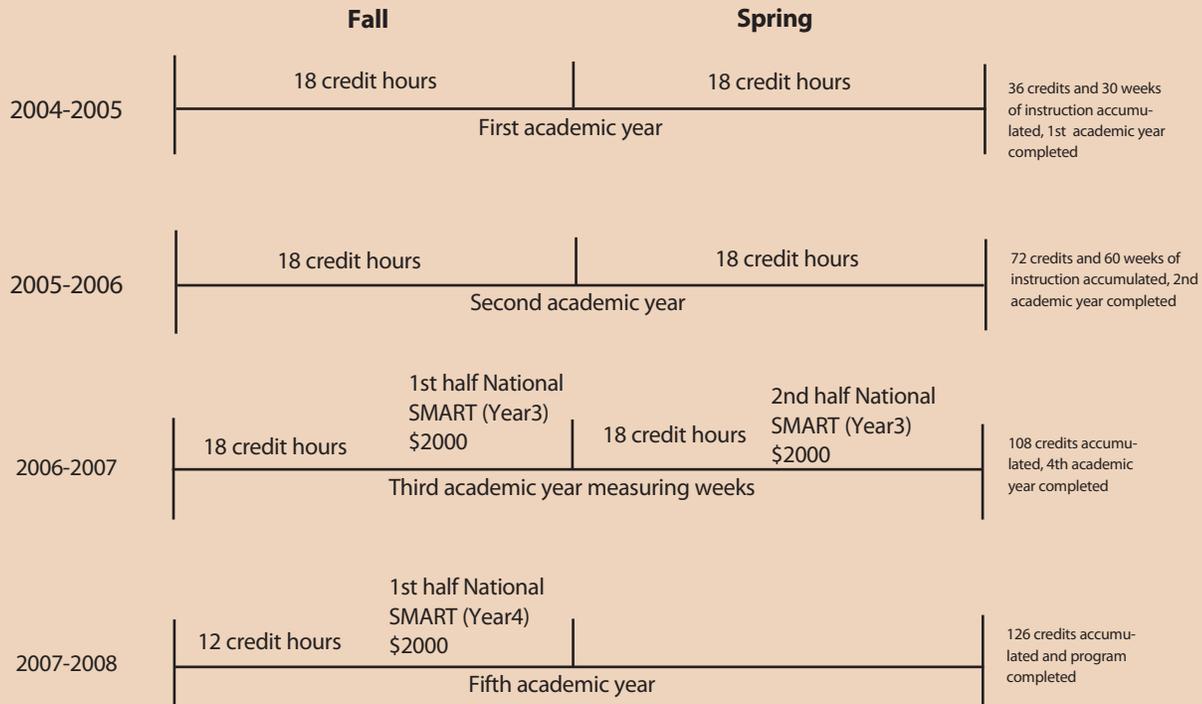
In his first year (2004-2005), Chuck enrolls for 18 semester hours in the fall semester and 18 hours in the spring semester. After he completes the Spring 2004-2005 semester, Chuck has accumulated 36 semester hours, which is enough to complete his 1st academic year. In the fall of 2005-2006, Chuck returns and attends for 18 semester hours. After this semester he has accumulated 54 semester hours. Since GTI assumes that he has enough weeks of instruction to go along with the semester hours necessary to complete his second year (60 weeks), then Chuck can be considered to have completed his second academic year. After completing the 2005-2006 spring term, Chuck now has accumulated 72 semester hours and is considered to have completed his third academic year with 72 semester hours and an assumed 90 weeks of instruction.

In the 2006-2007 terms Chuck receives his fourth academic year National SMART Grant Scheduled Award, 1/2 in the fall semester and, because he only has 90 semester hours through the fall semester, 1/2 in the spring semester. He is no longer eligible for any ACG or National SMART Grant awards after the 2006-2007 award year.

	Fall	Spring	
2004-2005	18 credit hours	18 credit hours	36 credits completed and 45 weeks of instruction assumed, 1st academic year completed
First academic year			
2005-2006	18 credit hours	18 credit hours	72 credits completed and 90 weeks of instruction assumed, 2nd and 3rd academic years completed
Second and third academic years			
2006-2007	18 credit hours	18 credit hours	108 credits completed and 135 weeks of instruction assumed, 4th academic year completed
1st half National SMART (Year4) \$2000		2nd half National SMART (Year4) \$2000	
Fourth academic year			
2007-2008	18 credit hours		126 credits completed and program completed
Fifth academic year			

Calculation case: exact accounting instead of assumption method

Under the same circumstances as the prior example, since GTI knows that Chuck will enroll in the spring 2007-2008 semester, the Financial Aid Director decides that GTI will do an exact accounting of academic year progression as schools are free to do on a student-by-student basis under the Dear Colleague letter guidance. Why do this? The Aid Director is aware that Chuck will not have the weeks of instruction to be considered in his fourth academic year at the start of the fall 2006 term. Chuck will only have completed 60 weeks of instruction by the start of the fall 2006 term. Therefore, his National SMART Grant for 2006-2007 is his third academic year Scheduled Award. When Chuck completes his program in the fall 2007-2008 term he can receive 1/2 of his fourth academic year National SMART Grant Scheduled Award. Thus, based on an exact accounting Chuck gets a total of 1 and 1/2 National SMART Grant Scheduled Awards instead of just one under the assumption method.



SUMMER TERMS & OTHER CROSSOVER PAYMENT PERIODS

Payment periods that span two award years

As with a student's Pell Grant, if the student is enrolled in a payment period that spans two award years, the entire payment period must be considered, for ACG and National SMART Grant purposes, to occur in one award year. If more than six months of the payment period occurs within one award year, you must consider the payment period to occur in that award year. You pay the student with funds from the award year in which the student's payment period is considered to occur with the payment calculated based on the relevant academic year's Scheduled Award for that award year.

You must assign the payment for an ACG or National SMART Grant to the same award year as the student's Pell Grant. Make sure that the assignment does not result in paying a student more than their ACG or National SMART Grant Scheduled Award for the academic year of their program of study.

Enrollment status for summer terms

Students must always be enrolled full-time to receive ACGs and National SMART Grants, even during summer.

At a traditional calendar school with a nonstandard term for summer, you may define full-time summer enrollment as less than 12 credit hours for ACG or National SMART Grant purposes if the nonstandard term minimum enrollment status calculation would allow a lower full-time status than the minimum for a semester, trimester, or quarter. That definition would apply to all FSA programs. Defining full-time for summer as at least 12 credit hours, may allow a school to calculate payments for payment periods using Formula 1 or 2 even though the summer term is a nonstandard term.

RECALCULATIONS

When determining enrollment status for ACGs and National SMART Grants, you must use the same recalculation policy that you use for Pell for term-based programs. If you set a recalculation (census) date for enrollment status, it must be the same date as for Pell. For example, if your school sets a census date of 10 days into the term and a student drops below full-time on that date, then the student is not eligible for an ACG or National SMART Grant for that term. For more detail on the requirements related to recalculations, see Chapter 3 of this volume.

Payment periods that span two award years

34 CFR 691.64

Different Calculation Dates

It is possible for Pell and an ACG or National SMART Grant to be calculated on different dates and have different applicable enrollment statuses for the same term. A school may not initially calculate an ACG or National SMART Grant until after its census date while it calculated the student's Pell Grant prior to the census date (See Chapter 3 of this volume for a discussion of initial calculations).

For both Pell and an ACG or National SMART Grant, the enrollment status is the status at the time the student's award is being initially calculated. For a student whose Pell award is calculated as full-time before the school's census date who then dropped to less than full-time when ACG or National SMART Grant eligibility is determined, the student would not be eligible for an ACG or National SMART Grant for the payment period even though the student remains eligible for a full-time Pell payment.

Stafford/PLUS Loan Periods and Amounts

The rules for awarding Stafford and PLUS loans are different than for Pell Grants and other FSA programs. Annual loan limits vary by grade level, and there are aggregate limits on the total amount that may be borrowed at one time. Also, the “loan period” and the disbursements within that period may not always correspond to the payment periods that you’re using for Pell Grants. Finally, the requirement to prorate Stafford loan limits is different than the requirements for calculating Pell Grants.

A borrower's eligibility for a Stafford or PLUS Loan is calculated differently than the Pell Grant. There is no fixed table such as the Pell Grant Payment and Disbursement Schedules that determines award amounts. Stafford Loans have annual and aggregate limits that are the same for all students at a given grade level and dependency status. This chapter will describe these loan limits and how they apply to the academic year in different types of programs.

Since you must determine a borrower's eligibility for Stafford/PLUS loans in combination with other sources of aid, we'll discuss this topic in further detail in Chapter 6 on packaging.

LOAN PERIODS, ACADEMIC TERMS, & PROGRAM LENGTH

It's important to define the loan period (sometimes referred to as the *period of enrollment*) at the outset, because the length of the loan period will determine the timing and amount of disbursements. This discussion assumes that your school has already established its academic measurements. If you have not already done so, see Chapter 1 for a discussion of eligible programs, academic years, payment periods, and conversion of clock hours/credit hours.

If a program uses standard terms, such as semesters, trimesters, or quarters, the loan period must coincide with one or more of its academic terms. The *minimum* loan period is a single academic term. (For a discussion of academic terms as used in awarding aid, see Volume 3, Chapter 3) As an example, if a student will be enrolled in the fall semester only and will skip the spring semester, you may certify a loan for that term alone. (Remember, however, that the loan amount must be based on the reduced costs and EFC for that term, rather than for the full academic year.)

CHAPTER 5 HIGHLIGHTS:

Measurements of academic and loan periods

- Loan periods, academic terms, & program length
- Scheduled Academic Year (SAY) may be used for credit-hour programs with standard terms.
- Borrower-Based Academic Year (BBAY) may be used as an alternative to an SAY for standard term credit-hour programs also offered in an SAY
- BBAY must be used for clock-hour, nonterm, and nonstandard-term programs, and for standard-term credit-hour programs without an SAY.

Annual Loan Limits

- Stafford limits for dependent undergraduates
- Stafford limits for independent undergraduates & dependent undergraduates whose parents can't get PLUS
- Undergraduate limits based on grade level
- Undergraduate limits must be prorated for programs less than an academic year or remaining portion of a program less than an academic year
- Stafford limits for graduate and professional students
- Stafford limits for teacher certification coursework

Aggregate Loan Limits

- Loan information provided through “Financial Aid History” on SAR, ISIR, and on NSLDS Web site.
- NSLDS now identifies underlying amounts for FFEL as well as Direct Consolidation Loans.

Period of enrollment (loan period)

The period of enrollment for which a Stafford or PLUS loan is intended. The period of enrollment must coincide with an academic period established by the school for which institutional charges are generally assessed (e.g., semester, trimester, quarter, length of the student's program or academic year). The period of enrollment is also referred to as the loan period.

34 CFR 682.200(b)

34 CFR 685.102(b)

Academic Year

See Volume 3, Chapter 1 for a discussion of academic year requirements.

Minimum and Maximum Loan Periods

→ Maximum = generally school's academic year but not more than 12 months.

→ Minimum (standard term programs) = one academic term.

→ Minimum (clock-hour, nonterm, and nonstandard term programs) = lesser of academic year, program length, or remaining portion of academic program.

Simultaneous FFEL and DL at the same school

34 CFR 685.300(a)(8)

A school may simultaneously participate in both the FFEL and DL programs, but student or parent borrowers may not receive the same type of loan (i.e. Stafford or PLUS) for the same period of enrollment. For example, a student may not receive Stafford loans from both the FFEL and DL programs at the same school for the same period of enrollment. However, a graduate/professional student may receive a Stafford loan from one program and a PLUS loan from the other program for the same loan period.

Stafford/PLUS at multiple schools

Unlike Pell Grants, it is possible for a student who is separately enrolled and eligible at multiple schools to get a Stafford (and for a graduate/professional student or parent to receive a PLUS) at more than one school for the same period. The schools that the student is attending are responsible for coordinating to make sure that the total amount of the loans the student receives does not exceed the applicable annual loan limit. In addition, the schools must ensure that there is no duplication of non-institutional costs when determining the student's cost of attendance. (Note that loan funds awarded at one school are not to be included as estimated financial assistance by any other school the student is attending when determining the student's loan eligibility for the same period.)

Loan periods for all other programs, such as nonterm or nonstandard term programs, are based on the length of the *program* or the length of the *Title IV academic year*. These loan periods also apply to programs that are a mixture of standard terms and nonstandard terms not offered in a traditional academic calendar. The **minimum** loan period for such programs is the shortest of:

- *The Title IV academic year as defined by the school.* (At least 30 weeks of instructional time for credit-hour programs and 26 weeks for clock-hour programs, and, for undergraduate programs, at least 900 clock hours, 24 semester hours, or 36 quarter hours.)
- *The length of the student's program at the school for programs of less than an academic year.*
- *The remaining portion of the student's program when the program exceeds the academic year.*

The **maximum** loan period is generally the school's academic year but cannot exceed a 12-month period. However, you can have more than one loan in an academic year up to the annual loan limit.

ACADEMIC YEAR & LOAN LIMITS

The academic year is used as the basis for the student's annual loan limits. (The award year concept for Pell and the Campus-based programs is not a factor for Stafford and PLUS loans.)

Depending on the program, a student who has reached the annual loan limit cannot receive another Stafford Loan until he or she either begins another academic year, or progresses within an academic year to a grade level with a higher annual loan limit.

The loan period is often equivalent to an academic year, but there are also many situations where this is not the case. In this section, we'll discuss how you can match the student's loan periods to his/her enrollment and your school's academic calendar. (If you are not familiar with the definition of an academic year, see Chapter 1 of this Volume.)

Two types of academic years for annual loan limits: SAY and BBAY

There are two types of academic years that may be used to monitor annual loan limits for Stafford loans: a Scheduled Academic Year (SAY) or a Borrower-Based Academic Year (BBAY). (Note that although there is no annual loan limit for PLUS loans, PLUS loans are awarded for the same SAY or BBAY period that is used for Stafford loans.) An SAY corresponds to a traditional academic year calendar that is published in a school's catalogue or other materials (for example, fall and spring semesters, or fall, winter, and spring quarters). An SAY is a fixed period of time that begins and ends at the same time each year. A BBAY does not have fixed beginning and ending dates. Instead, it "floats" with a student's (or group of

students') attendance and progression in a program of study.

Standard-term, credit-hour programs that are offered in an SAY (that is, a traditional academic year calendar) also have the option of using a BBAY. Standard-term, credit-hour programs that are not offered in an SAY must use a BBAY. Clock-hour, nonterm, and nonstandard-term programs must also use a BBAY. However, there are significant differences between the BBAY for standard-term, credit-hour programs, and the BBAY for clock-hour, nonterm, and nonstandard-term programs.

Standard-term, credit-hour programs using a traditional academic year calendar: Scheduled Academic Year

As noted above, an SAY corresponds to a traditional academic year calendar, and usually begins and ends at the same time each calendar year (for example, beginning on the first day of the fall semester and ending on the last day of the spring semester). An SAY may include one or more terms that a student does not attend. Summer terms are generally not considered to be part of the SAY, but for loan limit purposes they may be treated as “trailers” or “headers” to the SAY, as explained below. An SAY must meet the Title IV requirements for an academic year, as described in Chapter 1.

For loan limit purposes, a summer term may be treated as a “trailer” to the preceding SAY or as a “header” to the following SAY. Summer minisessions can be grouped together as a single trailer or header term, or they can be treated separately and assigned to different SAYs. (See Chapters 1 and 3 for treatment of minisessions as payment periods and in determining Pell payments.) If the summer minisessions are grouped and treated as a single term, the summer cost of attendance cannot include costs for a minisession for which the student is not expected to be enrolled.

Your school has the option to establish a policy that designates its summer term as either a trailer or header to the SAY for all students. You can also choose to make different designations for different educational programs, or for different students, as long as you ensure that there is no overlap in academic years. Note that a fixed designation of the summer term can limit a student’s eligibility. For instance, if you always treat your summer term as a trailer to a preceding fall-spring SAY, a student who receives the full annual loan limit for fall-spring would have no remaining loan eligibility for summer.

The annual loan limit applies to the SAY, plus the summer trailer or header. Once the calendar period associated with all of the terms in the SAY and the summer header or trailer (if any) has elapsed, a student regains eligibility for a new annual loan limit.

Standard-term, credit-hour programs using a traditional academic year calendar: Borrower-Based Academic Year

If a standard-term, credit-hour program is offered in a traditional academic year calendar (SAY), you have the option of using a BBAY as

an alternative to the SAY for monitoring annual loan limits for an individual student. Unlike an SAY, a BBAY is not a fixed period that begins and ends at the same time each year. Instead, a BBAY's beginning and ending dates depend on the individual student's enrollment.

For standard-term, credit-hour programs offered in a traditional academic year calendar, a BBAY must include the same number of terms as the SAY that would otherwise be used (not including any summer "trailer" or "header"). For example, if the SAY includes three quarters (fall, winter, spring), a BBAY would consist of any three consecutive terms. A BBAY may include terms the student does not attend if the student could have enrolled **at least half time** in those terms, but (unlike an SAY) it must begin with a term in which the student is actually enrolled. Also, any minisessions (summer or otherwise) that run consecutively within a term **must** be combined and treated as a single term. Like an SAY, a BBAY must meet the minimum Title IV requirements for an academic year. However, a BBAY that includes a summer term may include fewer than 30 weeks (or, for clock hour programs, 26 weeks of instructional time) of instructional time or fewer credit hours than the minimum number required for an SAY. This is because a summer term may be shorter than a standard term in an SAY, but is recognized as academically equivalent to a standard term when used as one of the terms in a BBAY. (NOTE: This exception applies only to a BBAY used as an alternative to an SAY for a standard term, credit hour program that is also offered in a traditional academic year calendar.)

You may use BBAYs for all students, only for students in certain programs, or on a student-by-student basis. For example, you could use a BBAY for students enrolled in a program that begins in a term other than the first term of the SAY. You can even alternate BBAYs and SAYs for a student, provided the academic years don't overlap. This treatment may allow a student to receive another loan sooner than would be allowed under an SAY standard. For instance, if you normally use an SAY consisting of Fall and Spring semesters with a Summer trailer, a student who received the maximum annual loan limit for Fall-Spring could not receive another loan until the start of a new SAY in the Fall. If the student enrolls for summer and wants a loan, you could choose to switch the student to a BBAY consisting of the Summer and Fall terms. The student could then receive a loan for the Summer term, since Summer would be the start of a new academic year. A school that has these choices for academic year standards must have a written policy that explains how it applies these options when calculating loan eligibility.

As with an SAY, the annual loan limit applies to the BBAY. Once the calendar period associated with all of the terms in the BBAY has elapsed, a student regains eligibility for a new annual loan limit.

Standard-term, credit-hour programs not using a traditional academic year calendar: Borrower-Based Academic Year

If a program is not offered in a traditional academic year calendar (SAY), a BBAY must be used. If the program uses semesters or trimesters, a BBAY generally consists of any two consecutive terms. If the program uses quarters, a BBAY consists of any three consecutive terms. As with the optional BBAY that may be used for programs offered in a traditional academic year calendar, the BBAY may include terms that a student does not attend (as long as the student could have enrolled at least half-time in those terms), but it must begin with a term in which the student is actually enrolled. Unlike the optional BBAY for programs offered in an SAY, there is no exception to the minimum Title IV academic year requirements for a BBAY that includes a summer term: the BBAY for programs that are not offered in a traditional academic calendar must always include enough terms to meet the minimum Title IV academic year requirements for weeks of instructional time.

The annual loan limit applies to the BBAY. Once the calendar period associated with all of the terms in the BBAY has elapsed, a student regains eligibility for a new annual loan limit.

Clock-hour, nonterm credit-hour, and nonstandard term credit-hour programs: Borrower-Based Academic Year

All clock-hour, nonterm, and nonstandard-term programs must use a BBAY that meets the minimum Title IV requirements for an academic year. This requirement also applies to programs that consist of both standard and nonstandard terms and that are not offered in a traditional academic calendar. That is, the BBAY must contain at least the number of weeks of instructional time and hours in the program's Title IV academic year. The Title IV academic year must contain at least 30 weeks of instructional time (or, for clock-hour programs, at least 26 weeks of instructional time) and the appropriate number of credit or clock hours (for undergraduate programs, at least 24 semester or trimester hours, 36 quarter hours, or 900 clock hours; for graduate programs, the number of hours a student would complete under the school's full-time standard in the weeks of the Title IV academic year, which must be a minimum of 30 weeks, or, for clock-hour programs, at least 26 weeks). The BBAY begins when a student enrolls and does not end until the student has completed the number of hours **and** the number of weeks in the academic year.

Because a student must successfully complete the minimum number of hours and weeks in an academic year before a new BBAY begins, a student's enrollment status may affect how soon the student regains eligibility for a new annual loan limit. For example, a student who is attending part-time will take longer to complete a BBAY than a full-time student. (In contrast, an SAY or BBAY for a standard term, credit-hour program ends when the *calendar period* associated with the terms in the SAY or BBAY has elapsed, regardless of how many credit hours or weeks of instruction the student completed during the SAY or BBAY.)

Clock-hour, nonterm and nonstandard BBAYs based on full-time progress

In many clock-hour, nonterm and nonstandard-term programs, students are allowed to progress at an individual pace. For example, a school that defines its academic year as 900 clock hours and 26 weeks of instructional time offers a 900 clock-hour program that most students complete in 26 weeks. However, one student might complete 900 clock hours in 22 weeks, and another in 30 weeks. You do not have to prorate the loan limit for the occasional student who completes the program in less than 26 weeks. (Note that this policy applies only to programs that are exactly one academic year in length. If a program is longer than an academic year, proration may be required for a loan covering the remaining portion of the program if a student completes more than the minimum number of hours during the first 26 weeks of instructional time. See loan limit proration example 3 on p. 3-95.)

Standard Term, Credit Hour Programs using a traditional academic year calendar: SAY

The Springfield Academy offers a two-year program measured in semesters and awarding credit hours. It defines its Title IV academic year in accordance with the minimum requirements and uses an SAY that provides 30 weeks of instruction and 24 semester hours, and includes two semesters (Fall and Spring), each 15 weeks of instructional time in length. Springfield Academy also offers a Summer session that it treats as a “trailer” to the SAY.

Most of Springfield’s students do not attend the Summer session, so the aid office typically certifies Stafford loans for a period of enrollment that starts with the Fall semester (August 27) and concludes at the end of the Spring semester (May 2). However, there are some first-year students who decide to enroll in the Summer term in order to complete their studies sooner. The annual loan limit applies to the Fall through Spring SAY, plus the Summer trailer. Students who receive the maximum annual loan amount for Fall-Spring have no loan eligibility for summer and may not borrow again until the start of the next SAY in the Fall.

Academic Year for loan limit purposes = 2 semesters + summer trailer

<u>Fall</u>		<u>Spring</u>		<u>Summer</u>
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Year 1: SAY + Summer Trailer

Year 2: SAY + Summer Trailer

Clock-hour, Nonterm, and Nonstandard Term program: BBAY

Example 1: Clock-hour Program

Springfield Academy has an 1800 clock-hour program with 60 weeks of instructional time, and defines its academic year as 900 clock hours and 26 weeks of instructional time. The BBAY always begins with the student’s actual enrollment date. An enrolling student may receive two Federal Stafford Loans during the program (provided all eligibility criteria are met) because the program exceeds one academic year. The period of enrollment for the first loan would be the time it will take the student to successfully complete (pass) 900 clock hours and 26 weeks. The period for the second loan would be the time it takes to successfully complete the final 900 hours/26 weeks. Note that the student cannot receive the second loan until he/she has successfully completed the first 900 hours of the program AND 30 weeks of instruction.

A student who completes the first 900 hours in less than 30 weeks must still complete 26 weeks of instructional time before a new BBAY begins and the student becomes eligible to receive another loan. Similarly, a student who has completed fewer than 900 clock hours after 26 weeks of instructional time must successfully complete 900 hours before receiving another loan.

Example 2: Nonterm credit hour program

A school offers a 48 semester hour program with a defined academic year of 24 semester hours and 30 weeks of instructional time. As with the clock-hour program in example 1, a student could receive two loans for this program. The period of enrollment for the first loan would be the time needed for a student to successfully complete the first 24 hours and 30 weeks of instructional time. The period of enrollment for the second loan would be the time needed to complete the remaining hours and weeks of the program. A student must successfully complete (pass) both 24 semester hours AND 30 weeks of instructional time before receiving the second loan.

Example 3: Nonstandard term, credit hour program

A school offers a 72 quarter hour program with 60 weeks of instructional time and a defined academic year of 36 quarter hours and 30 weeks of instructional time. Courses are offered in 5-week terms; a full-time student would be expected to complete six quarter hours in each term. As with examples 1 and 2, a student could receive two loans, one for the first 36 hours and 30 weeks, and another for the remaining hours and weeks of the program.

Although this program uses terms and measures academic progress in credit hours, the terms are nonstandard terms. A student does not become eligible for the second loan until he or she has completed both 36 quarter hours and 30 weeks of instructional time, regardless of the number of terms that have elapsed. For instance, a student who completes six quarter hours during each of the first five terms of the program, but only successfully completes (passes) three quarter hours of the six quarter hours in the sixth term, must complete an additional three quarter hours before receiving the second loan.

Standard Term, Credit-Hour programs using a traditional Academic Year calendar: BBAY

Examples 1a through 1c illustrate the optional use of a BBAY for a program that is offered in an SAY consisting of two semesters, Fall and Spring, each 15 weeks of instructional time in length. (Note that in each example, the first BBAY is the same as the SAY.)

In example 1a, the initial Fall and Spring terms could be considered either an SAY or BBAY. If the student attends the Summer session at the school, the aid administrator can elect to treat the Summer term and the next Fall as a BBAY for the student. In that case, the following Spring and Summer would also constitute a BBAY. The maximum loan limit for an academic year applies to each BBAY. If these were the first three years of study for a dependent student and the student progressed a grade level each academic year, he/she would be eligible for up to the maximum Stafford amounts of \$3,500, \$4,500 and \$5,500 for the respective academic years.

A student doesn't have to attend all of the terms in a BBAY, but the BBAY cannot begin with a term that the student doesn't attend. In example 1b, the student is not enrolled in the second term (Fall) of BBAY #2. In example 1c, if the student does not attend a term that otherwise would have been the beginning of a BBAY (in this case, Spring), then the student's next BBAY cannot begin until the next term that the student attends. As with example 1a, the annual loan limit applies to each BBAY.

The same concepts apply to quarter-term programs. For instance, in example 2, the Fall, Winter, and Spring terms constitute the school's SAY. If the student attends the Summer session at the school, it can be the first term of a BBAY that includes the following Fall and Winter terms

1. BBAY where SAY contains 2 semesters

1a.

Fall	Spring	Summer	Fall	Spring	Summer
Year 1: SAY or BBAY		Year 2: BBAY		Year 3: BBAY	

1b.

Fall	Spring	Summer	Fall <small>(not enrolled)</small>	Spring	Summer
Year 1: SAY or BB		Year 2: BBAY		Year 3: BBAY	

1c.

Fall	Spring	Summer	Fall	Spring <small>(not enrolled)</small>	Summer	Fall
Year 1: SAY or BBAY		Year 2: BBAY		Year 3: BBAY		

2. BBAY where SAY contains 3 quarters

Fall	Winter	Spring	Summer	Fall	Winter
Year 1: SAY or BBAY			Year 2: BBAY		

Standard Term, Credit-Hour programs not using a traditional Academic Year calendar: BBAY

Springfield Academy also has a program that measures academic progress in credit hours and uses 15-week semesters, but is not offered in a traditional academic year calendar (SAY). New students begin the program each month, and a 15-week semester begins at that time for that cohort of students. The school must use a BBAY to monitor annual loan limits. A BBAY consists of any two consecutive semesters, beginning with a semester in which a student is enrolled:

Semester #1 (begins program)	Semester #2	Semester #3	Semester #4 (not enrolled)	Semester #5	Semester #6
Year 1: BBAY		Year 2: BBAY		Year 3: BBAY	

Stafford Loan Limits

Beginning July 1, 2007, some but not all annual loan limits increase for loans disbursed on or after that date. You may package or certify/originate before July 1, but may not disburse loans based on the increased loan limits until July 1, 2007.

HEA Sec. 425(a)(1)(A)

HEA Sec. 428(b)(1)(A)

HEA Sec. 428H(d)

FFEL — 34 CFR 682.204 and 682.201(a)(3)

DL — 34 CFR 685.203

DCL GEN 06-02

ANNUAL LOAN LIMITS

Stafford Loans have annual loan limits, based on the student's dependency status and grade level. There are higher unsubsidized Stafford annual loan limits for some health professions students, and special loan limits for certain students who are not enrolled in a degree or certificate program. In some cases, the annual loan limits must be prorated (reduced). The annual loan limits are the maximum amounts that a student may receive for an academic year.

Annual Loan Limits: Basic Principles

- Annual loan limits are for an academic year.
- For a standard term credit hour program at a school with a traditional academic calendar, you may use either a Scheduled Academic Year (SAY; usually Fall-Spring with a separate summer session) or a Borrower Based Academic Year (BBAY) that varies from the student norm (such as Summer-Fall). You may also use both the SAY and the BBAY for an individual student at different times during the student's enrollment.
- For a standard-term, credit-hour program at a school that does not have a traditional academic calendar, you must use a BBAY.
- The loan period can be less than the academic year in some cases.
- For a clock-hour, nonterm or nonstandard-term program, or for a program that combines standard and nonstandard terms not offered in a traditional academic calendar, you must use a BBAY.
- In clock-hour, nonterm and nonstandard-term programs, a borrower must successfully complete the weeks of instructional time and credit/clock hours in the program's Title IV academic year before the borrower is eligible for a new annual loan limit.
- The student's maximum annual loan limit increases as the student progresses to higher grade levels.
- In a standard-term program using credit hours, the student will become eligible for a higher loan amount within an academic year if he/she progresses to the next grade level during the academic year.

Subsidized and unsubsidized loans

There are two types of loans in the Stafford program: subsidized and unsubsidized. The federal government pays the interest on a subsidized student loan during in-school status, the grace period, and during authorized deferment periods. The student is responsible for paying the interest on an unsubsidized student loan during all periods.

Example: additional unsub for independent undergraduate

Dottie is a first-year independent undergraduate student at Ferrar's Institute. Her COA is \$9,500, her EFC is \$1,800, and she is receiving a \$2,000 Pell Grant. Dottie qualifies for a subsidized Stafford Loan of \$3,500. She may also receive the maximum additional unsubsidized Stafford Loan amount of \$4,000 (\$2,200 to cover her unmet need, plus \$1,800 to replace the EFC). Her total loan amount in subsidized and unsubsidized Stafford Loans is \$7,500.

Stafford limits for a dependent undergraduate student

Beginning July 1, 2007, you may disburse Stafford loans for undergraduate students for the new increased limits: \$3,500 for a *first-year student*, and \$4,500 for a *second-year student*. The annual loan limit remains at \$5,500 for *third-, fourth-, or fifth-year undergraduates*. You may package or certify/originate based on the higher limits earlier, but may not disburse any loan based on the higher limits until July 1. These loan limits represent the total of all subsidized and unsubsidized Stafford Loans a dependent undergraduate student may borrow at each level of study, for a single academic year.

Increased unsubsidized Stafford limits for independent students and dependent students whose parents can't get PLUS

Independent undergraduate students may borrow unsubsidized loans with additional loan limits. The additional loan limits also apply to dependent undergraduate students whose parents are unable to borrow PLUS loans due to adverse credit or other documented exceptional circumstances. The following unsubsidized loan amounts may be added to the borrower's combined subsidized and unsubsidized loan limits. An independent undergraduate student enrolled in a program of study that is at least an academic year in length may borrow additional unsubsidized loan amounts not to exceed an annual total of:

- up to \$4,000 for a *first- or second-year student*; or
- up to \$5,000 for a *third-, fourth-, or fifth-year undergraduate*.

The subsidized portion of the annual loan limit may not exceed the overall annual loan limit for a dependent student. For example, an independent student in the second year of study would be eligible to borrow a total of \$8,500 in subsidized and unsubsidized Stafford loans, but no more than \$4,500 of this total may be in the form of a subsidized Stafford loan.

Grade level progression between different academic years

As shown above, the annual loan limit for Stafford Loans increases as a student progresses in his/her studies. Generally, a student's grade level for loan limit purposes is set according to the school's academic standards. Note that progression to a higher grade level

New annual amount for same grade level

For standard-term programs, if a student is enrolled at the same grade level after a full academic year has elapsed, the student may be eligible for a new annual maximum amount. For instance, if the student maintains satisfactory academic progress, he or she could conceivably receive two \$3,500 Stafford loans while completing the first year of the program.

If the student is maintaining satisfactory academic progress, your school is not permitted to have a general policy that limits the number of times the student can receive the maximum annual loan limit at one grade level. A school may refuse to certify/originate a loan, or may certify/originate a loan for an amount less than the borrower's maximum eligibility, only on a case-by-base basis. (See "refusing to originate or certify a loan" in Volume 4, Chapter 1.)

Additional Unsubsidized Stafford

Dependent students whose parents are unable to borrow PLUS loans due to adverse credit or other exceptional circumstances may receive additional unsubsidized Stafford loans for the same amount as independent undergraduate students. The increased loan amounts do not substitute entirely for the amount a parent may borrow under the PLUS program, which may be up to the difference between COA and EFA. As a result, you should examine the parent's ability to borrow a PLUS loan using an endorser who does not have an adverse credit history before certifying or originating additional unsubsidized loan amounts for the dependent student.

Before certifying or originating a loan for increased loan amounts, you must document the basis of the dependent student's eligibility. Some basic guidelines for making this determination include the following:

- The parent's unwillingness to borrow a PLUS does not make the dependent student eligible.
- A school's decision not to participate in the PLUS program does not make the dependent student eligible.
- The aid administrator's belief that a parent should not borrow a PLUS does not make the dependent student eligible.
- Only one parent must apply for a PLUS and be denied based on adverse credit. However, if both parents apply independently and one is approved and the other denied, the dependent student is not eligible for the increased loan amounts.
- The parent's denial of a PLUS loan based on adverse credit in one year does not support the dependent's eligibility in subsequent years.
- The dependent student may become eligible at any time during an academic year if a parent has first been approved and then later denied a PLUS based on a subsequent application. Under these circumstances, any previous PLUS funds received during the same period of enrollment are treated as estimated financial assistance in determining the student's remaining eligibility for additional unsubsidized loan amounts.

The dependent student may also be eligible for increased unsubsidized loan amounts if you determine and document that other **exceptional** circumstances exist that will prevent a parent from borrowing a PLUS loan. The regulations provide examples, but not an exhaustive list, of the exceptional circumstances that might be used to document the dependent student's eligibility:

- The parent is incarcerated.
- The parent's whereabouts are unknown.
- The parent has filed for bankruptcy and has provided a letter from the bankruptcy court stating that as a condition of the bankruptcy filing, the parent may not incur any additional debt.
- The parent's income is limited to public assistance or disability benefits and you have documented that the parent would not be able to repay the PLUS loan.
- in the DL Program, you have examined the family financial information and documented the parent's likely inability to repay the PLUS loan due to an existing debt burden or the parent's expected income-to-debt ratio, or
- in the FFEL Program, you have evidence that a lender that makes loans to students and parents of students at your school has denied a PLUS loan or will not make a PLUS loan to a parent under its lending policy due to the parent's existing debt burden, income-to-debt ratio, likely inability to repay, or other credit standards or factors the lender has elected to adopt as provided for under the regulations.
- The parent of a dependent student is not a U.S. citizen or permanent resident, or is not able to provide evidence from the U.S. Citizenship and Immigration Service that he or she is in the United States for other than a temporary purpose with the intention of becoming a citizen or permanent resident.

If a dependent student is determined to be eligible for additional unsubsidized loan amounts under exceptional circumstances, you must re-examine and document that these exceptional circumstances continue to apply before certifying or originating additional unsubsidized loan amounts for the dependent in a subsequent year.

Monitoring Annual Loan Limits: SAY and BBAY

SAY (Standard Term, Credit Hour Programs)	BBAY (Standard Term, Credit Hour Programs)	BBAY (Clock-hour, Nonterm, & Nonstandard Term Programs)
<ul style="list-style-type: none"> ➤ Consists of a traditional academic calendar with at least two semesters or three quarters ➤ Begins/ends at same time each year ➤ Must meet statutory requirements for an academic year ➤ Student regains eligibility for new annual loan limit after SAY calendar period has elapsed ➤ Total of all loans received within SAY (including summer trailer/header) may not exceed annual loan limit ➤ After original loan, student may receive additional loans during same SAY if: <ul style="list-style-type: none"> • Student did not receive maximum annual loan amount and has remaining eligibility; • Student progresses to grade level with higher annual loan limit; or • Student changes from dependent to independent ➤ Summer term may be "trailer" or "header" per: <ul style="list-style-type: none"> • Strict policy; • By program; or • Case by case, by student ➤ Summer minisessions may be combined and treated as single trailer/header, or assigned to different SAYs (affects all Title IV) 	<p>All standard term, credit hour programs:</p> <ul style="list-style-type: none"> ➤ Floats with student's enrollment ➤ Student regains eligibility for new annual loan limit after BBAY calendar period has elapsed ➤ Total of all loans received within BBAY may not exceed annual loan limit ➤ After original loan, student may receive additional loans during same BBAY if: <ul style="list-style-type: none"> • Student did not receive maximum annual loan amount and has remaining eligibility; • Student progresses to grade level with higher annual loan limit; or • Student changes from dependent to independent ➤ Must begin with term in which student is actually enrolled ➤ May include terms student does not attend if student could have enrolled at least half-time ➤ Minisessions (summer or otherwise) must be combined with each other or with other terms and treated as a single standard term (affects all Title IV) <ul style="list-style-type: none"> • Student need not enroll in each minisession, but must have been able to enroll at least half-time in the combined term ➤ Programs offered in SAY: May use BBAY for: <ul style="list-style-type: none"> • All students; • Certain students; or • Certain programs ➤ May alternate SAY and BBAY for a student if academic years do not overlap ➤ Length of BBAY must equal number of terms in SAY (excluding summer trailer/header) ➤ Number of hours/weeks in BBAY need not meet Title IV minimum if BBAY includes summer term ➤ Programs not offered in SAY: <ul style="list-style-type: none"> ➤ Must use BBAY ➤ BBAY consists of: <ul style="list-style-type: none"> • At least 2 consecutive semesters or trimesters; or • At least 3 consecutive quarters ➤ BBAY must meet Title IV minimum for hours/weeks 	<ul style="list-style-type: none"> ➤ Floats with student's enrollment ➤ BBAY must meet minimum Title IV requirements for academic year ➤ Begins with student's enrollment ➤ Student regains eligibility for new annual loan limit only after successfully completing minimum number of weeks and clock/credit hours in the program's defined Title IV academic year ➤ Student does not progress to next grade level until completion of BBAY ➤ After original loan, student may receive additional loans within a BBAY only if: <ul style="list-style-type: none"> • Student did not receive maximum loan amount and has remaining eligibility; or • Student changes from dependent to independent ➤ Also applies to programs that mix nonstandard terms and standard terms and that do not have an SAY

does not always coincide with the beginning of a new academic year for loan limit purposes. For example, a student in a standard-term, credit-hour program using semesters who completes only 12 semester hours during the first academic year of a 2-year program could receive another loan when the calendar period associated with that academic year has elapsed, but the student will still be classified as a first-year undergraduate at the start of the second academic year.

In contrast, progression to a higher grade level and the beginning of a new academic year for loan limit purposes always happen at the same time for a student in a clock-hour, nonterm or nonstandard-term program. A student who is enrolled in such a program must successfully complete the weeks and hours in the program's Title IV academic year, i.e., at least 30 weeks of instructional time (or, for clock-hour programs, at least 26 weeks) and the academic credit, in order to advance to the next grade level. For instance, a first-year student in a 2-year nonterm program who earns 36 quarter-credits over 24 weeks of instructional time cannot progress to the next grade level until another 6 weeks of instructional time are completed.

If a program can normally be completed in one year of full-time study, a student in that program can never receive more than the 1st-year annual loan limit in any given year, no matter how long it takes the student to finish. (Similarly, a student in a two-year program can never receive more than the 2nd-year annual loan limit for an academic year.)

Grade level progression within the same academic year

In standard term programs, a student who has already borrowed up to the annual limit within an academic year can receive additional loan funds if the student progresses to a grade level with a higher annual loan limit during that same academic year.

For instance, if a dependent student was classified as a 2nd-year student in the fall, he/she might have received as much as \$2,250 in the first Stafford disbursement. If the student achieved 3rd-year academic status based on the coursework completed in the fall semester, the student would now be eligible for the \$5,500 Stafford annual limit. If the student had sufficient financial need, you could disburse the difference between the amount the student already received and the new annual limit in the spring term (\$5,500 minus \$2,250 = \$3,250).

In all cases, the student may borrow the difference between the amount already borrowed within the academic year and the student's new loan limit. Usually, the increase in the loan amount can be made as an adjustment to the student's existing loan rather than making a new loan. Note that for a clock-hour, nonterm or nonstandard-term program, the student will never progress to a higher grade level within an academic year. In a clock-hour, nonterm or nonstandard-term program that is longer than an academic year, the student moves to a higher grade level only when he or she completes the BBAY.

Grade level progression

While the law defines minimum coursework for an academic year, it doesn't define how much coursework a student must complete to progress from one grade level to another. Unless a student's program of study or a school's academic standards clearly specify when this grade-level progression takes place, a reasonable approach would be to base grade levels on the number of credits required for the program, divided by the number of academic years it takes a typical student to earn that number of credits. For instance, if your school has a baccalaureate program that requires 120 semester hours of work and is typically completed in four academic years, then you might use a standard of 30 hours completed at each grade level.

Annual loan limits for students who transfer or change programs

The annual loan limits are based on an academic year. If a student transfers from one school to another school or changes to a different program at the same school and there is an overlap of academic years, this overlap may affect the amount that the student is eligible to borrow at the new school or for the new program.

An overlap in academic years exists if the academic year at the new school or for the new program begins before the calendar end date of the academic year at the prior school or program. A school may obtain documentation from the prior school of the specific beginning and ending dates for the prior academic year, or may consider the prior academic year to have begun with the starting date of the student's most recent loan period (as shown in NSLDS) and to have ended 30 calendar weeks later. (However, if the most recent loan period was more than 30 calendar weeks in length, the new school must consider the academic year at the prior school to have ended on the last date of the prior loan period.) Although the examples below involve students who transfer from one school to another school, the same principles would apply in the case of students who change programs within the same school.

Transfer from Graduate to Undergraduate program during an academic year

If a student transfers from a graduate program to an undergraduate program in the middle of an academic year, the undergraduate loan limit for the student's grade level applies, but amounts previously borrowed at the graduate level within the same academic year do not count against the undergraduate annual loan limit. The total amount awarded for the academic year may not exceed the higher (grad/professional) annual loan limit.

Standard-term programs

If a student enrolls in a *program with standard terms* after already having taken out a loan at another school with an overlapping academic year, the student initially may not receive more than the annual loan limit minus the amount received at the prior school. However, the student may borrow again for a subsequent term within the same academic year at the new school if the term begins after the end of the academic year at the prior school. For a subsequent term that begins after the end of the prior school's academic year, but within the initial academic year at the new school, the student may borrow up to the difference between the applicable annual loan limit and the amount already received for the new school's academic year.

Loan limits and work in a prior certificate program

A school may not link two stand-alone 1-year programs by making one a prerequisite for admission to the other so that students beginning the second 1-year program could be classified as second-year students for loan limit purposes. However, hours or credits earned in a prior certificate program could be used to classify a transfer student at a grade level higher than grade level 1, if the student transfers into a program that is greater than one academic year in length and the new school accepts a year's worth of credits/hours from the prior program. For instance, if a school admits a transfer student from a certificate program and accepts 900 clock hours that the student earned towards its 1500-hour program, the student could be eligible for the 2nd-year loan limits if other students in the program are eligible for 2nd-year loan limits after completing the first 900 hours of the program.

For example, a student receives a \$2,000 Stafford loan at School A for a loan period from May 1 to August 31. The student, a dependent undergraduate, transfers to a program at School B in September and is admitted at grade level 2. The student requests a loan for the Fall and Spring semesters (September-May). School B makes a determination that the academic year at School A ended on November 27 (30 weeks after the start of the loan period at School A). Because the academic year at School B begins before the end of the academic year at School A, the student may initially receive only up to a maximum of \$1,500 for the Fall semester at School B. This amount represents the difference between the annual loan limit (\$3,500) and the amount received at School A (\$2,000) for the overlapping academic year period. At the start of the Spring semester in January (after the end of the academic year at School A), the student may borrow up to an additional \$2,000, the difference between the annual loan limit and the amount already borrowed for the Fall-Spring academic year at School B. (As an alternative, School B could choose to place the

student on a BBAY schedule beginning with the Spring semester. The student would then be eligible to borrow up to the full annual loan limit for a Spring-Summer BBAY.)

Clock-hour, nonterm, and nonstandard term programs

If a student enrolls in a clock-hour, nonterm, or nonstandard term program after already having taken out a loan at another school with an overlapping academic year, the student is restricted to the original annual loan limit until the completion of the first academic year at the new school.

For example, a student receives the first disbursement (\$1,750) of a Stafford loan at School A for a loan period from April 1 to December 31. The student, a dependent undergraduate, leaves school A in June and transfers to an 1800 clock-hour program at School B. Because the academic years at the two schools overlap, the maximum loan amount that the student may receive for the first academic year of the program at School B (900 clock hours and 30 weeks of instructional time) is \$1,750, the difference between the first-year annual loan limit (\$3,500) and the amount received at School A (\$1,750).

Transfers & grade level

If you're awarding a Stafford loan to a student who is transferring from a program at another school to a program at your school that is greater than one academic year in length, you may use the loan limits for a student in the 2nd-year or higher level of study if your school classifies the student at that level based on the number of academic credits it accepts from the prior school, or based on the granting of advance standing in the new program. Note, however, that if an associate or bachelor's degree is required for entry into a program at your school, you *must* use the 3rd-year loan limits for a student who transfers to that program.

Note that the "Eligibility and Certification Approval Report" lists "1-year" as the highest educational program offered by the school if its longest program is 1 year or more, but less than two years in length. Students in programs longer than 1 year can be paid as 2nd year students even though the ECAR lists the school's highest offering as "1-year." For instance, if a student is enrolled in a 1500-hour program, he/she would be eligible for the 2nd-year loan limits after completing 900 clock hours and 30 weeks of instruction (or, for clock-hour programs, at least 26 weeks). However, the loan limit would have to be prorated for the remaining hours of the student's program.

Stafford Loan limits for graduate and professional students

The subsidized loan limit for a graduate or professional student is \$8,500 per academic year. The additional unsubsidized loan limit for graduate or professional students is \$12,000 per academic year, effective for loans first disbursed on or after July 1, 2007. (See the box on page 3-91 for a discussion of situations where a program combines graduate and undergraduate study, or a student with a degree is pursuing an undergraduate program.)

Increasing the loan amount when student changes grade level during the academic year

There may be two ways to make this change:

1. Certify/originate a new loan at the new grade level for the applicable amount (the difference between the new loan limit and the amount of the first loan). The loan period for the new loan must correspond to the term(s) during which the student qualifies for the higher loan limit (that is, it may not include a prior term when the student was classified at a lower grade level). If the new loan period is for a single term, the loan must be disbursed in two installments. (The school could also choose to cancel any pending disbursements of the first loan and certify/originate a new loan for an amount equal to the canceled disbursements of the first loan plus the additional amount for which the student is eligible due to the grade level change.)
2. Adjust the amount of the current loan. For FFEL, contact the lender to determine whether an increased loan amount due to grade level progression within an academic year may be processed as an adjustment without a new loan certification. For Direct Loans, change the grade level in the loan record and increase the amount of the existing loan to the new amount. For both loan programs, if the increased amount is for a single term (for example, a spring semester), it must be disbursed in two equal installments, one at the beginning of the term and one at the midpoint.

With either option, the increased loan amount must be calculated using only the costs and estimated financial assistance for the term(s) during which the student qualifies for the higher loan limit.

Increasing the loan amount when student changes dependency status during the academic year

For any type of educational program (whether term-based or nonterm, credit-hour or clock-hour), a dependent student who has already borrowed up to the annual loan limit within an academic year can receive additional loan funds if his or her dependency status changes to independent during that same academic year.

Remedial work & grade level

Remedial coursework can be counted towards the student's grade level progression, but only if the school's written and officially approved academic grade level progression policy specifies that remedial coursework can be counted for this purpose. Example: A school requires that the student complete 30 semester hours to progress to second-year grade level, and specifies that up to 10 of the hours may be in the form of remedial coursework.

Graduate & professional cites

FFEL grad/prof limits:

34 CFR 682.204(a)(5), (c)(2), and (d)(5)

DL grad/prof limits:

34 CFR 685.203(a)(5), (b), and (c)(2)(v)

Definition of graduate/professional student:

- is enrolled in a program that is above the baccalaureate level or leads to a first professional degree,
- has completed the equivalent of at least 3 academic years of full-time study at an institution of higher education (either before entrance to the program or as part of the program itself), and
- is not receiving Title IV aid as an undergraduate student for the period of enrollment.

The regulations define a graduate/professional student as a student who is enrolled in a post baccalaureate or professional program *and* has completed the equivalent of 3 academic years of full-time study at an institution of higher education. (Also, note that a student who is receiving Title IV aid as an undergraduate student can't be considered a graduate/professional student for that same period of enrollment.)

There are several rules to consider if a student is simultaneously taking undergraduate and graduate courses. A student in an undergraduate program can't get the graduate loan limits based on taking graduate coursework as a part of the undergraduate program. In contrast, a graduate student who is taking some undergraduate coursework is eligible for the graduate loan limits if the student is enrolled at least 1/2-time in courses (either graduate or undergraduate) that can be applied to the graduate program requirements. However, the student must already be admitted into the graduate program—a student with a bachelor's degree who is taking preparatory work for graduate school (or whose full admission to the graduate program is contingent upon completion of certain undergraduate courses) is not eligible for graduate loan limits.

PLUS Loan limits for Parents

The total PLUS Loan amount borrowed by one parent or borrowed separately by more than one parent (including a non-custodial parent) may not exceed the student's estimated cost of attendance minus other financial aid awarded for the period of enrollment. This is the only borrowing limit for PLUS Loans. For more on borrower eligibility, see Volume 1, Chapter 6.

PLUS Loan limits for graduate and professional students

Graduate/Professional PLUS loans may be made for up to the student's cost of attendance minus other estimated financial assistance under both the Direct and FFEL loan programs. Therefore, a graduate/professional student has additional PLUS eligibility beyond the maximum subsidized and unsubsidized loan limits.

The standard requirements of the PLUS loan program are the same for student borrowers as they were (and remain) for parent borrowers. There are also two new requirements that student borrowers must meet in addition to the existing PLUS requirements:

1) the student must complete the FAFSA.

2) the schools must determine the maximum annual subsidized and/or unsubsidized Stafford loan amount that the student is eligible to receive. In addition, we recommend that the school counsel the student on the advantages of Stafford loans over PLUS loans. However, the student is not required to receive Stafford loan funds as a condition for being allowed to apply for or be awarded a PLUS loan.

Graduate and Professional PLUS for Students

HEA Sec. 428(b)

DCL GEN-06-02

Grad/Professional PLUS loans were authorized by the Higher Education Reconciliation Act of 2005, effective July 1, 2006.

Graduate vs. Undergraduate limits: special cases

- **Combined undergraduate/graduate programs.**

Some programs combine undergraduate and graduate study, where the first years of the program are undergraduate study and the final years of the program are graduate study. For instance, in a 5-year program leading to a graduate or professional degree, the school may define the first 3 or 4 years of study as being undergraduate level.

- **Students returning for second baccalaureate degree.**

If a student with a baccalaureate degree enrolls in another baccalaureate program, his/her loan limits would be based on the amount of work that the school counts towards satisfying the requirements of the new program. For instance, if your school decides to accept 30 semester hours of a student's work in her previous baccalaureate program towards the requirements for a BS in Chemistry at your school and 30 semester hours are the amount needed to progress in grade level, then the student would be eligible for second-year undergraduate loan limits.

- **Undergraduate student with graduate degree.**

In some cases, a student who previously received undergraduate and graduate degrees returns to school to complete a second undergraduate program. Only the loans that the student received for the first undergraduate program are included in determining the student's remaining eligibility for loans for the second undergraduate program, up to the undergraduate aggregate limits.

Although loans received for graduate study are not counted toward a student's undergraduate aggregate loan limit, the combined loan amounts received for undergraduate and graduate programs may not exceed the total allowable aggregate loan limits. For more on combined loan limits, see page 3-101.

- **BA or AA but not a grad/professional student.** A student who has an associate or baccalaureate degree that is required for admission into a program, but is not a graduate or professional student, may borrow up to the highest undergraduate annual loan limit (\$5,500 for a dependent student; additional \$5,000 in unsubsidized Stafford for an independent student or a dependent student whose parent is not eligible for PLUS), subject to the undergraduate aggregate loan limits.

Preparatory & teacher certification coursework

In Volume 1, Chapter 6, we discussed three instances in which a student may receive a Stafford loan for coursework that is not part of an eligible program. If the student and the academic program meet the conditions described in that Volume, the annual loan limits are:

- **Preparatory coursework required for enrollment in an undergraduate degree or certificate program—course of study not to exceed 12 consecutive months:** \$2,625 subsidized/unsubsidized Stafford for a dependent student; and \$4,000 additional unsub Stafford for an independent student or a dependent student whose parent is not eligible for PLUS.

- **Preparatory coursework required for enrollment in a graduate or professional program:** \$5,500 subsidized/unsubsidized Stafford for a dependent student; and \$7,000 additional unsubsidized Stafford for an independent student or a dependent student whose parent is not eligible for PLUS.

- **Coursework necessary for state certification (or professional credential) required for teaching—students who already have a baccalaureate degree:** \$5,500 in subsidized Stafford Loans and \$7,000 additional in unsubsidized Stafford Loans.

Stafford Loan proration

FFEL: 34 CFR 682.204(a), (d)

Direct Loans: 34 CFR 685.203(a), (c)

When and when not to prorate

You must prorate a Stafford Loan limit for an undergraduate program if:

- the academic program is shorter than an academic year; or
- the student's remaining period of study is shorter than an academic year.

Stafford Loan limits are prorated only in these two situations. Loan limits are not prorated based on a student's enrollment status, such as when a student is enrolled less than full-time or is enrolled for a period of less than a full academic year that is not a remaining period of study. In addition, Stafford Loan limits are not prorated for students enrolled in graduate or professional level programs.

Loan proration requirements also do not apply to loans made to students taking preparatory coursework or coursework necessary for teacher certification. The annual loan limit must be prorated only when a student is enrolled in a program or remaining portion of a program that is shorter than an academic year. Students taking preparatory coursework or coursework needed for teacher certification are not enrolled in a program.

Note on fractions and decimals for prorating Stafford Loans

It is acceptable to convert the fraction to a decimal and then multiply the annual loan limit by the decimal, but this conversion is not a requirement. You may still choose to multiply the annual loan limit by the original fraction. However, you should be consistent in the method you use, since the fraction and decimal calculations sometimes result in slightly different prorated loan limits. (The decimal method will generally—if not always—result in an amount that is equal to or slightly higher than the amount calculated using the original fraction.)

PRORATING ANNUAL LOAN LIMITS FOR STAFFORD LOANS (UNDERGRADUATE ONLY)

The annual maximum loan amount an undergraduate student may borrow must be prorated in certain situations:

- when the student is enrolled in a program that is shorter than a full academic year; and
- when the student is enrolled in a program that is one academic year or more in length, but is in a remaining period of study that is shorter than a full academic year.

Please bear in mind that loan limit proration determines the maximum loan amount that a student may borrow for a program or remaining balance of a program, not the loan amount that the student actually receives. In some cases, the actual loan amount that a student is eligible to receive (based on costs, EFC, and other aid) may be less than the prorated loan limit.

Prorating loan limits for programs of study shorter than a full academic year

If an academic program is shorter than a full academic year in length, you must multiply the applicable loan limit(s) by the *lesser* of —

Semester, trimester, quarter or clock hours enrolled in program

Semester, trimester, quarter or clock hours in academic year

or

Weeks enrolled in program

Weeks in the academic year (at least 30, or, for clock-hour programs, at least 26)

The result is the prorated annual loan limit for that program. (You may express these fractions as decimals to see more easily which is less or to calculate the prorated limit.)

Prorating loan limits for remaining periods of study shorter than an academic year

You must also prorate loan limits for students enrolled in remaining periods of study shorter than an academic year. This circumstance can occur when a student is enrolled in a program that is one academic year or more in length, but the remaining period of study needed to complete the program will be shorter than an academic year.

Proration is required only when it is known in advance that a student will be enrolled for a final period of study that is shorter than an academic year. If a student originally enrolls for a final period of study that is a full academic year in length, but completes the program early in less than a full academic year, it is not necessary to retroactively prorate the annual loan limit.

In a *standard-term, credit-hour* program, a remaining period of study is considered shorter than an academic year if the remaining period contains fewer terms than the number of terms covered by the school's Title IV academic year. (For programs that are offered in a Scheduled Academic Year, the number of terms covered in the school's Title IV academic year usually does not include any summer "header" or "trailer" term.) For example, a student who is enrolled in a 4-year program that is offered in a Scheduled Academic Year consisting of three quarters plus a summer "trailer" has completed four academic years of study and received four Stafford Loans. The student needs to attend an additional quarter term to complete the program requirements. The final quarter term would fall in a new academic year, and thus the loan maximum would have to be prorated, because the remaining period of study (a single quarter) is less than a full academic year. As another example, a student who is enrolled in a 2-year program without a Scheduled Academic Year where the Title IV academic year covers two 15-week semesters has completed two academic years of study, but needs to return for an additional semester to complete the program requirements. Again, the loan limit would have to be prorated if the student receives a loan for the final semester.

In a *clock-hour, nonterm, or nonstandard-term* program, a remaining period of study is considered less than an academic year if the remaining period consists of fewer clock or credit hours than the program's defined Title IV academic year.

In each of the cases where there is a remaining portion less than an academic year, the annual loan limit for the student's grade level is multiplied by the following fraction to determine the prorated loan limit:

$$\frac{\text{Semester, trimester, quarter or clock hours enrolled in program}}{\text{Semester, trimester, quarter or clock hours in academic year}}$$

Unlike proration for programs that are shorter than an academic year, there is no comparison of weeks and hours. *Only the credit or clock hours that the student is scheduled to attend or is actually attending at the time of certification or origination are used in the calculation.*

Using school's definition of academic year if > FSA minimum

A school may choose to define its academic year as longer in weeks or hours than the minimum statutory requirements. If so, then it's the school's standard – not the statutory minimum – that applies when determining whether a program or a final period of study is shorter than an academic year.

Proration examples for programs shorter than an academic year

Example 1

Program = 400
clock hrs, 12
weeks of instructional
time

Academic year = 900 clock hrs, 26 weeks of
instructional time

Jill is a dependent student enrolled in a 12-week program at Hancock Career College. HCC defines the academic year for this program as 900 clock hours providing 26 weeks of instructional time. Measured in clock hours, Jill's program is 400 clock hours long.

To determine the maximum loan amount she can borrow, convert the fractions based on weeks ($12/26 = .46$) and hours ($400/900 = .44$) to decimals. Multiply the smaller decimal (.44) by the first-year annual loan limit: $\$3,500 \times .44 = \$1,540$. The maximum combined subsidized and unsubsidized loan amount Jill can borrow for the program is \$1,540.

Example 2

Program = 24 quarter hours, 20
weeks of instructional time

Academic year = 36 credit hrs,
30 weeks of instructional time

Morgan is an independent student enrolled in a program at Hancock Career College that provides 24 quarter hours and 20 weeks of instructional time. HCC defines the academic year for this program as 36 quarter hours and 30 weeks of instructional time. To determine the maximum loan amount she can borrow, convert the fractions based on weeks ($20/30 = .67$) and quarter hours ($24/36 = .67$) to decimals. Multiply the smaller decimal (in this case, both are .67) by the first-year annual loan limits for subsidized and unsubsidized Stafford:

$$\$7,500 \times .67 = \$5,025 \text{ total Stafford}$$

$$\$3,500 \times .67 = \$2,345 \text{ subsidized}$$

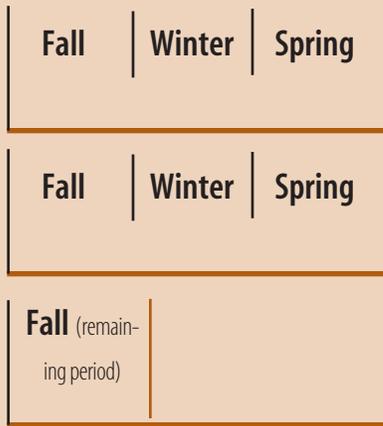
The maximum combined subsidized and unsubsidized Stafford amount Morgan can borrow for the program is \$5,025, with the subsidized loan amount limited to \$2,345.

Loan Limit Proration example for remaining period of study shorter than an academic year

Example 1

Academic year contains 3 quarters

Remaining period = 1 quarter



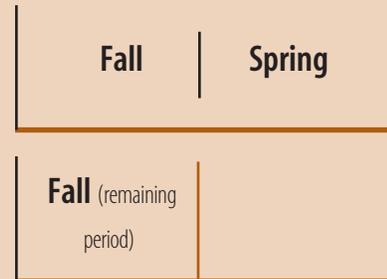
Rudy has attended 6 quarters in a 2-year program at Beulah Community College, but to finish the program, he needs to attend an additional quarter as a half-time student (6 quarter hours). Rudy is a dependent undergraduate student, and BCC defines its academic year (covering three quarters) as 36 quarter hours and 30 weeks of instructional time.

To determine the prorated Stafford loan limit, convert the fraction based on the hours that Rudy is expected to attend and the hours in the academic year to a decimal ($6/36 = .17$). Multiply this decimal by the second-year undergraduate annual loan limit: $\$4,500 \times .17 = \765 .

Example 2

Academic year contains 2 semesters

Remaining period = 1 semester



Rudy transfers to a BA program at Lacy Springs College. By taking 18 hours a semester, he will be able to graduate in the Fall term of his second year. Rudy is a dependent undergraduate student, and Lacy Springs defines its academic year (covering two semesters) as 24 credit hours and 30 weeks of instructional time.

To determine the prorated Stafford loan limit, convert the fraction based on credit hours to a decimal ($18/24 = .75$). Multiply this decimal by the fourth-year undergraduate annual loan limit: $\$5,500 \times .75 = \$4,125$.

Example 3

Program = 1800 clock hours

Academic year = 900 clock hours and 30 weeks of instructional time

Year 1: Student completes 1050 clock hours in 26 weeks
Year 2: 750 clock hours remaining in program

Knox Career College has an 1800 clock-hour program and defines its academic year as 900 clock hours and 26 weeks of instructional time. Sally, a dependent undergraduate student, successfully completes the first 900 clock hours of the program in 26 weeks of instructional time. However, she must complete an additional four weeks of instructional time before she may receive a second loan. After 26 weeks of instructional time have elapsed, Sally has successfully completed 1050 clock hours. She may then receive a second loan, but the loan limit must be prorated based on the number of clock hours remaining in her program at this point.

To determine the prorated loan limit for Sally's second loan, convert the fraction based on the clock hours remaining to a decimal ($750/900 = .83$). Multiply this decimal by the second-year undergraduate annual loan limit:

$$\$4,500 \times .83 = \$2,905$$

Proration example for remaining period of study with a scheduled period of non-enrollment

O'Donnell Institute has an academic year that covers three quarters: fall, winter, and spring. Milton will be enrolling in the fall and spring quarters, but not the winter quarter, and will graduate at the end of the spring quarter.

Because the fall quarter is in the same academic year as Milton final quarter, it is part of the final period of study, even though there is a term between the final quarter and the fall quarter in which he will not enroll. O'Donnell Institute may award Milton a single loan for the fall and spring quarters (costs for the winter quarter must be excluded), or separate loans for fall and spring. In either case, the annual loan limit must be prorated. (Note that if Milton decided to enroll for the winter quarter on a less-than-half-time basis, his remaining period of study — three terms — would be equal to a full academic year and proration would not be required for a loan covering the fall and spring quarters.)

Fall	Winter	Spring
enrolled	not enrolled	enrolled

Aggregate Loan Limits

FFEL: 34 CFR 682.204(b), (e)

DL: 34 CFR 685.203(d), (e)

Effect of change in student status on aggregate loan limits

In some cases, a student may qualify for higher loan limits, but then lose the eligibility for the higher limits. This situation could occur because a dependent student's parent received a PLUS loan after having been denied in previous years, and the student therefore could no longer borrow at the independent student loan levels, or because a student with a graduate degree entered an undergraduate degree program.

In these cases, you only count the loan amounts that the student would have received under his/her current eligibility as an undergraduate or dependent student against the applicable undergraduate aggregate loan limit.

For instance, if a dependent student was treated as an independent student for loan limit purposes and received additional unsubsidized Stafford amounts for the first 3 years at your school because a parent was denied a PLUS loan for each of those years, but a parent was eligible to borrow PLUS for the student's fourth year, the student would be eligible for the following Stafford amounts:

1st year (independent student loan limit) = \$7,500

2nd year (independent student loan limit) = \$8,500

3rd year (independent student loan limit) = \$10,500

4th year (dependent student loan limit) = \$5,500

The additional unsubsidized Stafford Loan amount of \$13,000 that the student received in the first three years of the undergraduate program is not counted against the \$23,000 dependent undergraduate aggregate loan limit. Excluding the additional unsubsidized amount, the student received only \$13,500 for the first three years. The student may therefore receive the entire 4th year maximum loan amount, even though the student's total outstanding Stafford Loan amount is \$32,000.

Resolving negative information in NSLDS

If you can document that the student is eligible for FSA funds despite the information shown on NSLDS, you may award and disburse aid. An example would be if the NSLDS Financial Aid History page of the SAR or ISIR shows that the student has a defaulted loan, but you have obtained documentation from the holder of the loan that the borrower had made "satisfactory arrangements to repay."

GEN-96-13, Q&A 37

AGGREGATE LOAN LIMITS

A borrower who has reached his or her aggregate borrowing limit may not receive additional loans. Once the loans are repaid, in full or in part, the borrower may apply for additional Stafford Loans. Although certain *annual* loan limits have increased for loans disbursed on or after July 1, 2007, no *aggregate* loan limits have increased.

The maximum outstanding **total subsidized and unsubsidized** Stafford Loan debt is:

- \$23,000 for a dependent undergraduate student,
- \$46,000 for an independent undergraduate student (or a dependent undergraduate student whose parents do not qualify for PLUS loans). No more than \$23,000 of this aggregate amount may be in the form of subsidized loans.
- \$138,500 for a graduate or professional student (including loans for undergraduate study). No more than \$65,500 of this aggregate amount may be in the form of subsidized loans.

The loan amounts counted towards these maximums include any outstanding amounts borrowed in the form of Stafford Loans or Supplemental Loans for Students program (the discontinued SLS program). In the case of a Consolidation Loan, the outstanding amount of the Consolidation Loan representing any underlying Stafford or SLS loans that were paid off by the Consolidation Loan is counted towards the aggregate Stafford Loan limits.

Checking loan amounts on NSLDS

If a student at your school has FSA loans that were received at other schools, you may need to check the National Student Loan Data System (NSLDS) Web site to make sure the student still has remaining eligibility under the aggregate loan limits.

As long as there is no conflicting information, you may rely on the financial aid history (provided on the ISIR as well as the NSLDS Web site) and the Transfer Student Monitoring process to tell you if a student is about to exceed the aggregate Stafford Loan limits. (The NSLDS financial aid history may affect eligibility for other FSA programs, so it is discussed in more detail in Volume 1, Chapter 3.)

If you need to review your student's loan history on NSLDS, keep in mind that the loan amounts for any Stafford or SLS loans that were once in repayment status may include accrued interest, collection cost, fees, and/or capitalized interest. None of these charges should be included when you're checking to see how much the student has borrowed against the aggregate limits for subsidized Stafford Loans and total Stafford borrowing.

The aggregate loan limits do not include accrued interest and other charges. To avoid counting interest and other charges when determining a student's remaining loan eligibility using NSLDS, use the **aggregate outstanding principal balance (Agg OPB)** shown in NSLDS for each of the student's outstanding Stafford Loans. For instance, if the student has been making payments on a \$3,500 loan and the aggregate outstanding principal balance is now \$3,100, count the \$3,100 towards the student's aggregate loan limit.

Using NSLDS to establish the subsidized and unsubsidized Stafford portions of a Consolidation Loan

The **Agg OPB** shown in NSLDS for a Consolidation Loan may include payoff amounts on the underlying loans that should not be counted toward the aggregate Stafford Loan limits.

The subsidized and unsubsidized amounts of Direct Consolidation Loans have always been reported to NSLDS along with the total loan amount. The specific amounts for underlying subsidized and unsubsidized loans are not available for FFEL Consolidation Loans from private lenders, but NSLDS now provides an estimate of the Subsidized, Unsubsidized, and "Unallocated" amounts included in an FFEL Consolidation Loan.

Since Stafford and Perkins loans are reported to NSLDS, the system will be able to properly categorize those loans. (Perkins Loans are not counted towards the Stafford Loan limits, but loans from the SLS program in the 1980s are included, because SLS was a forerunner of today's unsubsidized Stafford Loan.)

However, the FFEL Consolidation Loan may also include some non-FSA loans that NSLDS can't identify, such as loans from the Health and Human Services (HHS) programs. If NSLDS can't determine from the reported underlying loans whether part of a FFEL Consolidation Loan should be counted in the subsidized or unsubsidized category, it will report that portion as "Unallocated."

Treatment of consolidated Perkins Loans

A consolidated Perkins Loan is not counted toward the aggregate Stafford Loan limits in either the FFEL or Direct Loan program.

When to review "unallocated" amounts for an FFEL Consolidation Loan

Beginning January 1, 2006, you do not have to review unallocated amounts in NSLDS. NSLDS does not add the amount of unallocated loans when triggering the close to or exceeds aggregate limits flags.

NSLDS on the Web

You can review the complete student loan history for your students and generate reports on the NSLDS Web site for aid professionals:

<https://www.nslsdfap.ed.gov/>

NSLDS guides & help center

Guides for Enrollment Reporting, Transfer Student Monitoring and other user documentation are currently posted on IFAP under "Current FSA Publications" or "On Line References."

Also see NSLDS Newsletter #6 on IFAP for more specific information on how the OPB and Agg OPB are calculated in NSLDS.

Technical assistance for NSLDS is available at:

1-800-999-8219

Financial Aid History Requirement & NSLDS

To ensure that a student doesn't exceed the annual and aggregate Stafford Loan limits, the student's FAFSA data is matched with the National Student Loan Data System and the student's loan history is included in the ISIR. If a student transfers to your school, you must inform NSLDS so that it can begin the Transfer Student Monitoring process. More detailed information on how this requirement applies to all of the FSA programs can be found in Volume 1, Chapter 3 of the FSA Handbook.

School's responsibilities for checking NSLDS data

In some instances, because of timing or coding problems by lenders and guaranty agencies, all of the loans that made up a consolidation loan will not be included in the NSLDS. Schools will be responsible only for the data contained in the NSLDS and are not expected to research further or to make assumptions regarding other non PC loans contained in NSLDS.

GEN-96-13, Q&As 54 and 55

HERA Changes to how to handle unallocated amounts in NSLDS

NSLDS Newsletter 11, online at <http://ifap.ed.gov/nslsmaterials/attachments/Newsletter11.pdf>

Example: Consolidation and Stafford Loan Limits

An independent undergraduate student transfers to your school to complete her fourth year of baccalaureate study. She applies for a Stafford Loan and has financial need for the maximum annual loan amount (\$5,500 in subsidized Stafford and \$5,000 in unsubsidized Stafford). Her NSLDS record indicates that she has an Agg OPB of \$24,625 on a Consolidation Loan made by a FFEL lender. Because the undergraduate aggregate subsidized limit is \$23,000, you cannot disburse any subsidized loan funds unless you can determine that the total amount of subsidized Stafford Loans represented in the consolidation amount is less than \$23,000.

The student's loan record shows that her Consolidation Loan was made on August 30, 2006. She previously had three subsidized loans that were paid through consolidation (PC) earlier in July and August. The Disbursed Amounts for her loans are: \$2,625 for her first-year loan, \$3,500 in her second year, and \$5,500 in her third year. The NSLDS record also shows two unsubsidized loans, paid-in-full in July and August, which she received in her second and third years, when she qualified as an independent student.

STAFFORD LOANS (CONSOLIDATED)	STAFFORD LIMIT	REMAINING ELIGIBILITY
Subsidized \$2,625		
Subsidized \$3,500		
Subsidized \$5,500		
TOTAL SUBSIDIZED \$11,625	\$23,000	\$11,375
Unsubsidized..... \$4,000		
Unsubsidized..... \$5,000		
TOTAL SUB + UNSUB \$20,625	\$46,000	\$25,375

Adding the loans up, we can see that the student has received a total of \$11,625 in subsidized Stafford and an overall total of \$20,625 in Stafford funds.* Therefore, you may pay the student her full loan amounts (\$5,500 subsidized and \$5,000 unsubsidized) without exceeding the aggregate Stafford Loan limits for an independent undergraduate.

*There are several possible reasons why the \$25,000 Consolidation Loan is greater than the total Stafford borrowed (\$20,625)— the Consolidation amount may include Perkins or health loans that have been consolidated, or it may include capitalized interest or other charges.

Method used in NSLDS to estimate subsidized and unsubsidized FFEL amounts

- **Calculated Subsidized Agg. OPB**
- **Calculated Unsubsidized Agg. OPB**
- **Calculated Unallocated Agg. OPB**

NSLDS takes the total amount originally disbursed for all of the identified underlying subsidized loans and divides that amount by the originally disbursed amount of the Consolidation Loan, which approximates the percentage of the total original consolidation loan that can be attributed to the subsidized loans. This percentage is then applied to the current outstanding balance of the Consolidation loan with the result being the amount that is included in the NSLDS calculation of the total amount of Subsidized loans for the student.

A similar process is followed to allocate the unsubsidized amount.

NSLDS subtracts the total of the calculated subsidized and unsubsidized outstanding balance amounts from the actual outstanding balance of the consolidation loan. Any balance is considered to be “unallocated.”

NSLDS assumes the amount was borrowed from the FFEL or Direct Loan programs and is included in the total combined balance. However, none of the “unallocated” amount is included in the Subsidized balance as it is unlikely to have come from a Subsidized Loan.

EFFECT OF OVERBORROWING

A student who has inadvertently received more than the annual or aggregate Stafford loan limits is ineligible to receive *any* FSA funds until the overborrowing is resolved. The student can regain eligibility for aid by repaying the amount that exceeded the Stafford annual or aggregate loan limits, or by making satisfactory arrangements with the Stafford lender (or the DL servicer) to repay the excess amount. The holder of the loan may choose to develop a repayment plan that has the borrower reaffirm that he or she will repay the excess according to the terms and timing of the original promissory note. If the inadvertent overborrowing occurred at your school, you should work with the student and the loan holder to ensure that the necessary actions are taken to restore the student’s eligibility.

Once you have documented that the student has either repaid the excess loan amount or has made satisfactory arrangements with the loan holder to repay the excess amount, you may award additional aid. However, the student may or may not be eligible to receive additional Stafford loan funds, depending on the circumstances. For example, a dependent undergraduate who inadvertently exceeded the \$23,000 aggregate Stafford limit could not receive any additional Stafford Loan funds as a dependent undergraduate unless the outstanding debt was paid down below the \$23,000 limit. However, the student could receive additional non-Stafford aid. An independent undergraduate who inadvertently exceeded the \$23,000 subsidized limit (but who has not reached the \$46,000 combined aggregate loan limit for independent undergraduates) could borrow additional unsubsidized Stafford once he or she makes satisfactory arrangements to repay the subsidized amount that exceeds \$23,000. For more on overborrowing and over-awards, see Volume 5.

Consolidation of loan amounts that exceed the annual or aggregate loan limit

If a borrower who inadvertently received more than the annual or aggregate Stafford Loan limits has consolidated the loan(s) that caused the borrower to exceed the loan limit, the consolidation loan is considered to be a satisfactory arrangement to repay the excess amount that restores the borrower’s eligibility for Title IV aid. (Note, however, that consolidation of an amount that exceeded the aggregate Stafford Loan limits does not automatically make a student eligible for additional Stafford Loan funds. See the discussion on this page under “Effect of Overborrowing.”)

Example: Resolving cases of overborrowing

Beth, an independent undergraduate student, is applying for a Stafford Loan for her fifth and final year of baccalaureate study at your college. Beth has remaining loan eligibility under the \$46,000 combined aggregate loan limit for independent undergraduates and at first, she appears to be within the aggregate limit for undergraduate subsidized Stafford Loans.

However, you have recently become aware that Beth previously borrowed Stafford Loans while attending a community college several years prior to coming to your college.

STAFFORD LOANS

Subsidized BANK ONE 1991	\$2,625
Subsidized BANK ONE 1992	\$3,500
Subsidized BANK TWO 1998	\$2,625
Subsidized BANK TWO 1999	\$3,500
Subsidized BANK TWO 2000	\$5,500
Subsidized BANK THREE 2001	\$5,500
TOTAL SUBSIDIZED	\$23,250

In fact, your review of her NSLDS records indicates that Beth has borrowed \$250 in subsidized Stafford Loans in excess of the aggregate undergraduate limit. Because the loan made by BANK THREE was the one that exceeded the loan limit, Beth needs to make arrangements with BANK THREE to repay the amount for which she was not eligible.

When BANK THREE has confirmed that Beth has made satisfactory arrangements to repay the excess loan amount, you may make other FSA awards to Beth, including unsubsidized Stafford Loans.

You can't make a subsidized Stafford Loan to Beth until she has repaid the \$250 that exceeds the aggregate subsidized Stafford Loan limit and further repaid enough of her outstanding balance to be eligible for the Stafford amount that you intend to award to her. (For instance, you could not award her a new \$5,500 Stafford Loan until she has reduced her outstanding balance to \$17,500.)

Annual Limits for Stafford Loans

	<i>Subsidized</i>	<i>Total (subsidized & unsubsidized)</i>
<i>Dependent Undergraduates</i>		
First Year	\$ 3,500	\$ 3,500
Second Year	\$ 4,500	\$ 4,500
Third Year and Beyond	\$ 5,500	\$ 5,500
<i>Independent Undergraduates, etc.</i>		
First Year	\$ 3,500	\$ 7,500
Second Year	\$ 4,500	\$ 8,500
Third Year and Beyond	\$ 5,500	\$ 10,500
<i>Graduate & Professional Students</i>		
All Years of Study	\$ 8,500	\$ 20,500

Note: All undergraduate annual loan amounts are subject to proration.

Aggregate Limits for Stafford Loans

	<i>Subsidized</i>	<i>Total (subsidized & unsubsidized)</i>
<i>Dependent Undergraduates</i>	\$ 23,000	SAME
<i>Independent Undergraduates, etc.</i>	\$ 23,000	\$ 46,000
<i>Graduate & Professional Students</i>	\$ 65,500	\$ 138,500

Note: Certain health professions students may qualify for higher annual & aggregate limits—see discussion at the end of this chapter.

Example: Combined Loan Limits

An independent student receives the following loan amounts for a first undergraduate program and a graduate program:

	First undergraduate program:	Graduate program:	Total:
subsidized	\$20,500	\$45,000	\$65,500
unsubsidized	\$10,000	\$40,000	\$50,000

The student has now enrolled in a second undergraduate program. Only the loans received for the first undergraduate program are counted toward the student's undergraduate aggregate loan limit. Because the total amount received for the first undergraduate program (\$30,500) does not exceed the aggregate loan limit for an independent undergraduate (\$46,000, maximum \$23,000 subsidized), the student has remaining loan eligibility of up to \$15,500 for the second undergraduate program.

However, the loans received for the graduate program must be considered in determining whether the student has exceeded the total aggregate loan limits. In this case, the total subsidized amount already received (\$65,500) is the maximum subsidized amount that a student may receive for undergraduate and graduate study combined. Therefore, the student may receive only unsubsidized loans for the second undergraduate program.

Increased Eligibility for Health Professions Students

The Health Education Assistance Loan (HEAL) Program, a loan program for health professions students administered by the Department of Health and Human Services, was gradually phased out beginning in 1995. The phaseout has now been completed, and no further HEAL Program loans are being made. To replace loan funds that otherwise would have been available under the HEAL Program, certain health professions students may borrow increased unsubsidized Stafford Loan amounts.

With the complete phaseout of HEAL, the Department has removed the earlier restrictions that limited participation to schools that had disbursed HEAL loans in fiscal year 1995 and to students who, as of October 1, 1995, were not HEAL borrowers.

Increased unsubsidized amounts

For any loan period beginning on or after May 1, 1999, schools may award the increased unsubsidized amounts to students who are enrolled at least half-time in a health professions discipline that (1) was eligible under the HEAL Program and (2) is accredited by an approved accrediting agency. (See “Dear Partner” Letter GEN-99-21.) The disciplines that were eligible under the HEAL Program and the approved accrediting agencies for these disciplines are shown in the loan limit chart for the increased unsubsidized amounts on page 3-104. Note that the HEAL Program required a need analysis test, while need analysis (represented by the EFC) is not required for unsubsidized Stafford loans.

NOTE: Foreign schools were not eligible to participate in the HEAL Program, and they may not award the increased unsubsidized Stafford Loan amounts.

Increased annual loan limits

Because the increased annual unsubsidized Stafford Loan limits are intended to replace funds that would have been available previously under the HEAL Program, the annual loan limits for the increased unsubsidized amounts are the same as the HEAL Program annual loan limits. The chart at the end of this chapter shows the annual loan limits for the increased unsubsidized amounts, which vary by discipline and academic year (AY) length, as well as the approved accrediting agency for each discipline.

Increased aggregate loan limits

The combined subsidized/unsubsidized aggregate loan limit for graduate and professional health professions students who are eligible to receive the increased unsubsidized amounts is \$189,125 (not more than \$65,500 of this amount may be in subsidized loans).

Increased unsubsidized loan amounts for naturopathic medicine students

In addition to the health professions disciplines that were eligible under the HEAL Program, domestic schools may also award additional unsubsidized Stafford Loan amounts to students enrolled in certain Naturopathic Medicine programs. To qualify for the additional unsubsidized amounts, the student must be enrolled in a program that leads to a Doctor of Naturopathic Medicine (N.M.D.) degree or a Doctor of Naturopathy (N.D.) degree, and the program must be accredited by the Council on Naturopathic Medical Education (CNME).

The authority to award additional unsubsidized Stafford Loan amounts to eligible Naturopathic Medicine students is effective for any loan period that begins on or after May 1, 2005. The maximum annual additional unsubsidized amount is \$20,000 for a program with an academic year covering nine months, and \$26,667 for a program with an academic year covering 12 months. (For a program with an academic year covering 10 or 11 months, the annual additional unsubsidized loan limit must be prorated as described in the chart on the following page.)

The increased aggregate Stafford Loan limit for eligible Naturopathic Medicine students is \$189,125 (not more than \$65,000 of this amount may be in subsidized loans).

For additional information, see Dear Colleague Letter GEN-05-09.

Effect of transfer to non-health profession program of study

If a student receives the additional Stafford loan amounts on the basis of study in a health profession program, but then leaves that program and enters a program in a different field, the student is no longer eligible for the increased Stafford loan limits. However, the additional loan amounts received on the basis of health professions study are not counted toward the normal aggregate Stafford Loan limit for that student.

Programs Eligible for:

Additional \$20,000 in Unsubsidized Loans for an Academic Year Covering 9 months
Additional \$26,667 in Unsubsidized Loans for an Academic Year Covering 12 months

Doctor of Allopathic Medicine	Accreditation: Liaison Committee on Medical Education
Doctor of Osteopathic Medicine	Accreditation: American Osteopathic Association, Bureau of Professional Education
Doctor of Dentistry	Accreditation: American Dental Association, Commission on Dental Accreditation
Doctor of Veterinary Medicine	Accreditation: American Veterinary Medical Association, Council on Education
Doctor of Optometry	Accreditation: American Optometric Association, Council on Optometric Education
Doctor of Podiatric Medicine	Accreditation: American Podiatric Medical Association, Council on Podiatric Medical Education

Additional \$12,500 in Unsubsidized Loans for an Academic Year Covering 9 months
Additional \$16,667 in Unsubsidized Loans for an Academic Year Covering 12 months

Doctor of Pharmacy	Accreditation: Accreditation Council for Pharmacy Education
Graduate in Public Health	Accreditation: Council on Education for Public Health
Doctor of Chiropractic	Accreditation: Council on Chiropractic Education, Commission on Accreditation
Doctoral Degree in Clinical Psychology	Accreditation: American Psychological Association, Committee on Accreditation
Masters or Doctoral Degree in Health Administration	Accreditation: Accrediting Commission on Education for Health Services Administration

PRORATION OF ANNUAL LOAN LIMIT FOR ACADEMIC YEAR COVERING 10 OR 11-MONTHS: For programs with an academic year covering 10 or 11 months, the annual additional unsubsidized loan limit must be prorated. If the academic year covers 10 or 11 months, the prorated annual loan limit is determined by dividing the applicable loan limit for an academic year covering 9 months by 9, and then multiplying the result by 10 or 11.

EXAMPLE OF ANNUAL LOAN LIMIT: The increased unsubsidized amounts that an eligible health professions student may receive are in addition to the regular Stafford annual loan limits. For example, a student enrolled in a 9-month Doctor of Dentistry program is eligible for the regular Stafford subsidized/unsubsidized annual loan maximum for a graduate/professional student (\$20,500, not more than \$8,500 of which may be subsidized), plus the maximum increased unsubsidized amount of \$20,000, for a total Stafford loan maximum of \$40,500.

Awarding Campus-Based Aid

Your school has more latitude in selecting recipients of its Campus-Based funds than in Pell or Stafford/PLUS. This chapter discusses the criteria that you must consider when selecting Campus-Based recipients, and the amounts that you may award to them. In addition, the student must meet the general eligibility criteria discussed in Volume I, and your Campus-Based awards may not exceed the student's financial need, as described in Chapter 7 on packaging.

GENERAL CAMPUS-BASED AWARD RULES

Selecting independent & part-time students

If any part of a school's FSEOG, FWS, or Federal Perkins Loan allocation is directly or indirectly based on the financial need of independent students or students who are attending part-time, then you must offer a *reasonable proportion* of the FSEOG allocation, the FWS allocation, and the dollar amount of the loans made from the Perkins revolving fund to such students. This requirement includes part-time students at eligible branch campuses as well as part-time students on the home campus. A policy that excludes part-time or independent students is not acceptable.

"Part-time students" also include correspondence students. To be considered enrolled in a program of correspondence study, the student must be enrolled in a degree-seeking program and must have completed and submitted the first lesson.

Uneven costs/unequal disbursements

If the student incurs uneven costs or receives uneven resources during the year and needs extra funds in a particular payment period, you may make unequal disbursements of FSEOG and Perkins. There is no explicit provision for unequal disbursements in FWS. However, because FWS wages are disbursed as work is performed, usually on a weekly or bi-weekly schedule, total disbursement amounts are likely to be different from one payment period to the next. In addition, as we'll discuss in the FWS section, a student may be paid for work performed during certain periods of non-attendance.

Summer school and special sessions

A student who enrolls as a regular student in an eligible program during summer school or a special session may receive Campus-Based aid if he or she meets the same general eligibility requirements that apply to a student enrolled in a regular session. If a student is not enrolled during the summer or special session, the student is not eligible to receive Campus-Based aid during the period of **nonattendance**, except in the case of an FWS job. (See FWS discussion in this chapter.)

CHAPTER 6 HIGHLIGHTS

■ FSEOG:

- Undergraduate only — see Volume 1 for rules.
- Maximum \$4,000, Minimum \$100.
- Priority order for FSEOG recipients is based on Pell eligibility and lowest EFCs.

■ Perkins:

- Undergraduate/graduate eligibility.
- Undergraduate: \$4,000 per year and \$20,000/agg.
- Graduate: \$6,000/year and \$40,000/agg.
- Selection based on exceptional financial need as defined by school.
- Also note Equal Credit Opportunity requirements.

■ FWS

- Undergraduate/graduate eligibility.
- Awards based on academic workloads & other factors, packaged based on net earnings, after taxes and job-related costs are subtracted.
- Student may be employed during certain periods of nonattendance.

■ Related Information:

- See Chapter 7 of this Volume for a discussion of packaging Campus-based aid with other assistance so as not to exceed the student's financial need.
- See Volume 1 for rules on undergraduate vs. graduate status.
- See Volume 4 for rules governing timing of disbursements & general FSA funds management.
- See Volume 6 for information on operating an FWS or Perkins Loan program, including allowable types of employment, JLD and Work-Colleges, due diligence in making Perkins loans, terms of repayment, etc.

Selecting independent and part-time students

34 CFR 674.10(b), 675.10(c), 34 CFR 676.10(b)

FSEOG cites

Selection Procedures 34 CFR 676.10
Frequency of disbursements 34 CFR 676.16(a) and (e)
Minimum and maximum awards 34 CFR 676.20

Award year & payment period

“Award year” is defined as “the period of time from July 1 of one year through June 30 of the following year.”

Institutional Eligibility regulations, 34 CFR 600.2

As discussed in Chapter 1 of this volume, the payment period for a program that uses standard academic terms is a semester, trimester, or quarter. See Chapter 1 for a description of payment periods in programs not using terms or not using standard terms.

Payment period defined: 34 CFR 668.4

Selecting FSEOG Prohibitions

A school would not be in compliance with the Higher Education Act, as amended, and with the FSEOG regulations were it to award FSEOGs on a first-come, first-served basis or were it to arbitrarily set expected EFC benchmarks (cutoffs) from below which it would select FSEOG recipients. Such a practice might exclude otherwise eligible students from the selection process. Furthermore, professional judgment is not an appropriate means of attempting to resolve the indicated circumstance; professional judgment is applicable only to making an adjustment or adjustments to an expected EFC or to a cost of attendance amount, not as a means to circumvent the FSEOG selection policy.

Crossover payment period example

Brian and Brad are enrolled at Scruples Business School in a payment period that begins in June 2006 and ends in August 2006, and both are among those students with the lowest EFCs who will also receive Pell Grants in that payment period. Brian is receiving a 2005-2006 Pell Grant disbursement for that payment period and Brad is receiving a 2006-2007 Pell Grant disbursement for that payment period—both students have met the FSEOG first selection group requirement for that crossover payment period.

AWARDING FSEOG

Award Amounts

The maximum Federal Supplemental Educational Opportunity Grant (FSEOG) for a full academic year is usually \$4,000. However, you may award as much as \$4,400 to a student participating in a study-abroad program that is approved for credit by the home school. The minimum FSEOG amount is \$100, but you may prorate this amount if the student is enrolled for less than an academic year.

The FSEOG maximum award for a student applies to both the Federal share and the required non-federal share. However, when your school has a waiver of the non-federal share, the FSEOG maximum applies to just the FSEOG federal funds. When there is no waiver, the FSEOG federal dollars awarded to a student are considered to be 75 percent of that student’s total FSEOG award and the school must account for the remaining 25 percent non-federal share, regardless of the type of school resources used and the method used to match. For more detail on the requirements of federal and non-federal shares, see Volume 6, Chapter 1.

Selecting FSEOG Recipients

When awarding FSEOG funds for an award year, you must first select students with the lowest expected family contributions (EFC) who will also receive Pell Grants in that award year. This group is known as the FSEOG first selection group. If your school has remaining FSEOG funds after making awards to all Pell Grant recipients for that award year, you must next select students with the lowest EFCs who are not receiving Pell Grants. This group of students is known as the FSEOG second selection group.

A student who will also receive a Pell Grant in that award year is a student who has demonstrated Pell Grant eligibility for the same award year based upon an EFC that you have calculated for the student, or the EFC on the student’s SAR or ISIR.

You must keep documentation of the eligible EFC that was calculated for the student, and you must confirm Pell Grant eligibility prior to disbursement of the FSEOG. If the FSEOG recipient does not actually receive a Pell Grant during the award year, but the documentation shows that the FSEOG award and disbursement was made in good faith, you are not required to recover the FSEOG funds. If the student loses Pell Grant eligibility prior to disbursement of the FSEOG, you must cancel the FSEOG award.

Crossover payment period

Certain flexibilities exist when determining whether a student is considered to be in the FSEOG first selection group during a crossover payment period, that is, a period that begins before July 1 of any award year and ends after July 1 of that same award year. If a student will also receive a Pell Grant during a payment period that occurs in two award years and the student is among those students with the lowest EFCs, the student satisfies the FSEOG first selection group requirements

for the same crossover period regardless of which award year the Pell Grant funds are attributed.

In order to be considered part of the FSEOG first selection group, a student does not necessarily have to receive a Pell Grant in the same crossover payment period. A student can also be awarded FSEOG funds under the FSEOG first selection group requirements during a crossover payment period, from either award year's allocation, as long as the student will also receive a Pell Grant in the award year to which the crossover payment period is attributed for Pell Grant purposes.

Establishing categories of students

Your selection procedures may specify categories of students to ensure that the students in each category have an opportunity to be awarded FSEOG funds. Categories may be based on class standing, enrollment status, program, date of application, or a combination of factors. You may choose to assign a percentage or dollar amount of FSEOG funds to each category; there is no requirement to make the percentage or dollar amount proportional to the need of students in a particular category or even to the number of students in the category.

However, categorization may not be used to exclude certain students or groups of students from consideration. If you know that your school's funds are so limited as to effectively exclude year after year categories that come later in the sequence, your school may not be in compliance with the "reasonably available" provision.

Your school's written selection procedures must ensure that FSEOG recipients are selected on the basis of the lowest EFC and Pell Grant priority requirements over the entire award year. If your school enrolls students as often as monthly or weekly, FSEOG funds can be reserved for use throughout that award year (on the basis of your school's experiences from previous periods), and selection practices can be applied in a manner that would assure a reasonable consistency over the entire award year.

When you use categories to package FSEOG, within each category you must first award the assigned FSEOG funds to students with the lowest EFCs who will also receive a Pell Grant. If FSEOG funds assigned for that category still remain, you must next award FSEOG funds to students in the category with the lowest EFCs who will not receive a Pell Grant.

Frequency & amount of FSEOG disbursements

If you're awarding an FSEOG for a full academic year, you must pay a portion of the grant during each payment period, *even if the student's program doesn't use standard academic terms.* (See Chapter 1 for an explanation of payment periods.)

To determine the amount of each disbursement, you would usually divide the total FSEOG award by the number of payment periods the student will attend. However, you are allowed to pay an FSEOG in unequal amounts if the student has costs or resources that are

Categories of students for FSEOG selection

This guidance is based on Dear Colleague Letter
CB-91-8.

FSEOG Award of less than \$501

The FSEOG award for purposes of being allowed to make a single payment FSEOG award when the award for a full academic year is less than \$501 consists of both the federal share and required nonfederal share (unless your school has a waiver of the nonfederal share).

When there is no waiver, the FSEOG federal dollars awarded to a student are considered to be 75 percent of that student's total FSEOG award and the school must account for the remaining 25 percent non-federal share, regardless of the type of school involved and the method used to match. For more detail on the requirements of federal and non-federal shares, see Volume 6, Chapter 1.

Perkins citations

Selection procedures: 34 CFR 674.10
Exceptional need: 34 CFR 674.10(a)(1)
Must have estimate of Pell eligibility: 34 CFR 674.9(d)
Selection of independent & part-time students:
34 CFR 674.10(b)
Equal credit opportunity: 34 CFR 674.20

Example: Perkins selection procedures

When packaging aid, Barton University first awards Perkins Loans to third-year students whose financial need is at least \$500 after their EFCs, Pell Grants, and any scholarships received have been subtracted from the cost of attendance. Next, the University awards Perkins Loans to second-year students whose financial need is at least \$750. The school continues to award Perkins Loans to such pre-defined groups until the Fund is exhausted or all exceptional financial need is met.

Grad/undergrad status in teacher certification program

A student enrolled in a teacher certification program may be considered either an undergraduate or a graduate student. If a teacher-certification student has already borrowed the maximum aggregate allowed for an undergraduate, but your school considers him/her to be a graduate student, the student is eligible to receive an additional Perkins Loan. At the point the school classifies and treats this student as a graduate student, he/she would only be eligible for graduate level Title IV aid.

Perkins overawards prior to 1999 regulatory revision

Because previous aggregate loan maximums were not tied to the completion of two academic years of undergraduate work, some schools may have inadvertently created an overaward by awarding more than \$8,000 to borrowers who had not completed two undergraduate years. Schools are not required to resolve such overawards if they were made prior to the publication of the revised statutory maximums. (The revised statutory maximums were first published in the Federal Register on July 29, 1999.)

different for different payment periods. There's another exception—if the total amount awarded a student under the FSEOG Program is less than \$501 for an academic year, only one payment is necessary.

You may make payments *within* a payment period in whatever installments will best meet the student's needs.

AWARDING PERKINS LOANS

The maximum amount an undergraduate student may borrow is \$4,000 per award year; the maximum for a graduate or professional student is \$6,000 per award year.

Like Stafford Loans, Perkins also have aggregate loan limits:

- \$8,000 for any student who has not completed two academic years of undergraduate work.
- \$20,000 for an undergraduate student who has completed two academic years and is pursuing a bachelor's degree.
- \$40,000 for a graduate or professional student, including loans borrowed as an undergraduate student.

The aggregate loan limits now include only unpaid principal. (Previously, a student who had borrowed the maximum cumulative amount for a graduate or professional student would not be eligible for another loan even if the student had repaid part or all of the amount he or she had borrowed.)

The annual maximums and aggregate maximums include any amounts borrowed previously under the Federal Perkins Loan Program, including National Direct/Defense Student Loans.

Perkins selection criteria

When awarding Perkins Loans, you must give priority to those students with exceptional financial need, as defined by your school. Your school's Perkins selection procedures must be in writing, uniformly applied, and kept on file at the school. See Volume 2 for record retention and consumer information requirements.

Before you may award a student a Perkins Loan, you must determine the student's Pell Grant eligibility. You may use an unofficial calculation to determine Pell Grant eligibility before a student has filed a *Free Application for Federal Student Aid* (FAFSA). However, your school may not disburse the Perkins Loan until you have received the student's official EFC for that award year (on the student's SAR or ISIR).

Increased loan eligibility to cover higher costs of study abroad

If the reasonable costs of the foreign study program exceed the cost of attending the home school, the awarded Perkins Loan may exceed the annual and/or aggregate loan limits by up to 20%. A

Equal Credit Opportunity Act (ECOA) rules

A school making Perkins loans is subject to the requirements of the ECOA. With only limited exceptions, the ECOA prohibits a lender from considering the applicant's age, race, color, religion, national origin, sex, marital status, or receipt of public assistance when evaluating loan applications. Lenders are not permitted to consider whether the applicant has a telephone, whether the applicant's sources of income are from retirement benefits or part-time employment, or whether the applicant might bear or rear children.

In the case of a "special purpose credit program" that uses financial need as a criteria for the loan, a lender may collect certain borrower information. The Perkins program is considered a special purpose credit program, therefore you "may request and consider, in determining an applicant's eligibility for the program, information regarding the applicant's marital status; alimony, child support, and separate maintenance income; and the spouse's financial resources." This information is collected on the FAFSA.

ECOA regulations: 12 CFR 202

school may disburse a Perkins Loan to a student engaged in a program of study abroad if the student meets all eligibility requirements and is enrolled in an eligible program at the school that will accept credits earned abroad.

AWARDING FEDERAL WORK-STUDY (FWS)

Unlike the other two Campus-Based programs, the FWS Program does not require that priority be given to students who have *exceptional* financial need. However, you must make FWS jobs reasonably available, to the extent of available funds, to all eligible students. Your selection procedures must be in writing, uniformly applied, and kept in your school's files.

There are no specific award limits for FWS earnings, other than the requirement that the amount of the FWS award not exceed the student's financial need. For a full discussion of packaging FWS with other aid, see Chapter 7 in this volume.

When deciding on an appropriate FWS award for a student, you should consider the student's academic workload and any other factors that might affect the hours that a student could work each week.

Basing FWS awards on net work earnings

The *gross* amount of the award is based on the total number of hours to be worked multiplied by the anticipated wage rate. For awarding and packaging purposes, you should use the student's *net* FWS earnings, which exclude taxes and job-related expenses. To determine the student's *net* FWS earnings, you should subtract any job-related costs and non-refundable taxes from the student's *gross* FWS earnings. If you are certain that the student's federal or state taxes paid will be refunded, you should not subtract those taxes paid from the student's gross earnings.

Job-related costs are costs the student incurs because of his or her job. Examples of job-related costs include uniforms, the cost of meals at work, and transportation to and from work. For work during vacation periods, job-related costs can include room and board as long as the FWS student incurs these costs only because of the FWS employment. For example, room and board during the summer *cannot* be

Calculating Maximum Gross Earnings Example

Chris has unmet financial need of \$1,000 at Peterson University. Because Chris has a Social Security tax of 7.65% (that will not be refunded) and \$108 in job-related costs, the school may allow Chris to earn an FWS award amount that is higher than his \$1,000 unmet financial need in order for him to earn the allowable \$1,000 net FWS earnings.

To calculate the FWS award amount to reflect the maximum gross FWS earnings that Chris may earn without the net FWS earnings exceeding the student's \$1,000 financial need, the school must do the following:

1. Add the amount of job-related costs to the amount of his unmet need ($\$108 + \$1,000 = \$1,108$) for a total of \$1,108.
2. Account for the Social Security tax by determining that his net FWS earnings are 92.35% of his gross earnings ($100\% - 7.65\% = 92.35\%$) or (.9235).
3. Divide the total in step 1 by the ratio in step 2 ($\$1,108 / .9235 = \$1,199.78$) for a result of \$1,199.78 (\$1200 after rounding).

Peterson University may give Chris a \$1,200 FWS award and his net FWS earnings will not exceed his \$1,000 unmet financial need.

Taxes and job-related costs cite

34 CFR 675.25(a)

Work during nonattendance

For further information about working during vacation periods or periods of nonattendance, see the discussion of enrollment requirements in Volume 1.

FWS for period preceding study abroad

A student in an eligible program of study abroad may be employed during a period of nonattendance preceding the study abroad if he or she will be continuously enrolled in his or her American school while abroad and if the student's study is part of the American school's own program. In such a case, a student may be employed in a qualified position in the United States, at the American school's branch campus in a foreign country, or at a U.S. government facility abroad.

included in job-related costs if the FWS student also takes summer courses.

Earnings for the next period of enrollment

Many FWS students must pay the bulk of their education costs in the beginning of each period of enrollment, before they have had a chance to earn FWS wages. Therefore, you may allow a student to earn FWS wages to cover educational expenses in the next period of enrollment that your school offers. The student must be planning to enroll in that next period of enrollment and must demonstrate financial need for that period of enrollment. The next period of enrollment is usually the next term, including a summer period, or in the case of summer earnings, the next full academic year.

A student may earn FWS funds for the next period of enrollment during any period of enrollment, including a period of enrollment that is comprised, in whole or in part, of mini-sessions. A student may also earn FWS wages towards the next period of enrollment during a period of nonattendance, as discussed below.

Working during periods of nonattendance

A student may be employed under FWS during a period of nonattendance, such as a summer term, an equivalent vacation period, the full-time work period of a cooperative education program, or an unattended fall or spring semester. To be eligible for this employment, a student must be planning to enroll for the next period of enrollment and must have demonstrated financial need for that period of enrollment. The student's net earnings (earnings minus taxes and job-related costs) during this period of nonattendance must be used to cover expenses associated with his or her financial need for the next period of enrollment.

When a student who had an FWS job in a period of non-attendance fails to enroll in the next academic period, you must be able to demonstrate that the student was eligible for employment and that, at the time the FWS was awarded, you had reason to believe the student intended to enroll in the next period. At a minimum, you must keep a written record in your files showing that the student had accepted the school's offer of admittance for the next period of enrollment. If during the period of nonattendance you learn that the student will no longer enroll in the next period of enrollment, the student must immediately stop working under FWS.

FWS and minisessions

If your school combines a series of mini-sessions or modules into one term (e.g., three summer mini-sessions into one summer semester), an FWS student attending any of the mini-sessions may earn FWS wages at any time throughout that term. You may apply those earnings towards the student's financial need for the mini-session(s) attended and/or the next period of enrollment. You must base the student's financial need for attending the summer term on the period when the student is actually enrolled in the mini-sessions.

The amount of FWS wages a student may earn at any given point in the term does not depend on whether or not the student is enrolled in a mini-session at that point in time. You have some flexibility in deciding with the student how to distribute the hours worked throughout the summer term. (See the example in the sidebar.)

Minisession example

Cohogs University has a summer term made up of three mini-sessions. Ted enrolls in classes for the June and August mini-sessions, but does not enroll in any classes for the July mini-session. Ted has a financial need of \$500 for his attendance in two of the summer mini-sessions. Ted also plans to enroll in the following fall semester and has a remaining need of \$250 for that semester. Ted is given a \$750 FWS award in the summer (\$500 for the two summer mini-sessions and \$250 for the fall semester). Ted knows his June mini-session courses will be very demanding and he will not have time to work. So, Ted earns \$500 during the July mini-session when he has no classes. Ted has classes again in August, but his academic workload is lighter. In August, Ted earns \$250 towards his education costs in the upcoming fall semester.

Packaging Aid

Once you've received the student's FAFSA information (including EFC) and calculated the student's Pell eligibility, you can package the student's aid. The general rule in packaging is that the student's total financial aid and other Estimated Financial Assistance (EFA) must not exceed the student's financial need (Need = Cost minus the EFC). If you discover that the student has other EFA that cause the aid package to exceed the student's need, you must attempt to adjust the aid package to eliminate the overaward. If the overaward can't be eliminated, you must follow the overaward procedures in Volume 5.

In Chapters 3, 4, and 5, we describe how to calculate student awards, based on costs, period of enrollment, and statutory award maximums. Except for Pell Grants, FSA award amounts are also constrained by the other aid that a student receives, known as *estimated financial assistance* (EFA). The general rule is that the student's total aid may not exceed the student's financial need. (Need = Cost of Attendance minus EFC.)

The process of awarding aid without exceeding the student's financial need is traditionally called packaging. Packaging is a process that varies from school to school, depending on the types of scholarship and other aid available at the school, and the characteristics of the student population. Schools may have different packaging philosophies, but they generally try to find the best combination of aid to meet the financial need of the students they serve.

To help you package Federal student aid with your other aid awards, we provide a Packaging module in EDEXpress. You can enter information about your school's student aid programs and set up factors to be considered in packaging, and then use the software to automate the packaging process.

Most schools use some form of packaging software, whether EDEXpress or software from a commercial vendor. You are not required to use EDEXpress to package FSA awards, and you do not have to report the student's aid package to the Common Origination and Disbursement system.

CHAPTER 7 HIGHLIGHTS:

- Related software: EDEXpress Packaging Module
 - Available at <http://www.fsadownload.ed.gov>
- Packaging Principles
 - Pell Grants packaged first; not reduced for other aid.
 - ACG/SMART package may be reduced to eliminate an overaward.
 - Campus-based and Subsidized Stafford Loans based on Pell, eligibility, EFC, and estimated financial assistance.
 - Subsidized Stafford Loans based on Pell, eligibility, EFC, and estimated financial assistance.
 - Unsubsidized Stafford Loans and PLUS based on Pell eligibility and estimated financial assistance.
- Treatment of need-based earnings
- Treatment of other aid: special cases
 - Americorps and veterans educational benefits
 - Vocational rehabilitation assistance
 - Bureau of Indian Affairs grants

Hurricane Information

Special Federal Student Aid awarding/packaging guidance for hurricane affected schools can be found at <http://ifap.ed.gov/eannouncements/katrina.html>

Financial need

$$\begin{array}{r} \text{Cost of Attendance} \\ - \text{EFC} \\ \hline \text{Financial Need} \end{array}$$

Some key points from Chapter 5 (Calculating Stafford/PLUS Awards)

- Before you certify or originate a Stafford Loan, you must determine the student's eligibility for a Pell Grant.
- You may certify or originate a subsidized Stafford Loan only for the amount of student's financial need—the student's costs minus the student's EFC and estimated cost minus financial assistance.
- A student may qualify for a combination of subsidized and unsubsidized Stafford loans.
- If they meet program requirements, the parents of a dependent student can take out a PLUS loan to pay for the student's cost of attendance. There is no fixed loan limit for PLUS loans—the maximum loan amount is based on the student's financial need.
- If the student is independent, or his/her parents can't borrow a PLUS, the student is eligible for additional unsubsidized Stafford amounts.
- Unsubsidized Stafford loans and PLUS loans can be used to replace the EFC, as well as to cover the student's unmet need.
- PLUS Loans are now available to graduate and professional students

Pell can't be used to pay loan

If the student's aid package includes a loan and the package must be adjusted to prevent an overaward, the Pell funds can't be used to pay back the loan—a loan repayment isn't an educational expense.

Estimated Financial Assistance

HEA: Sec. 428(a)(2)(C)(ii)
FFEL: 34 CFR 682.200(b)
DL: 34 CFR 685.102(b)

PELL GRANTS AS FIRST SOURCE OF AID

Pell Grants are considered to be the first source of aid to the student, and packaging FSA funds begins with Pell eligibility. The Department issues Pell payment schedules that base the award solely on the student's cost of attendance, EFC, and enrollment status. As we'll see, aid from the other FSA programs must be awarded to ensure that the student's need is not exceeded, unless certain types of aid are used to replace the EFC, as permitted.

Traditional financial aid practice suggests that you would also adjust non-federal aid awards, if necessary, to ensure that the student's financial need is not exceeded. But it's possible that the student will receive a scholarship or other aid that you can't adjust and is large enough (in combination with the Pell Grant) to exceed the student's need. In this case, the student is still eligible for a Pell Grant based on the payment schedule. However, you can't award any FSA funds other than the Pell Grant.

For instance, the National Collegiate Athletic Association's rules for athletic aid sometimes permit a school to award athletic aid that exceeds the student's need. You must still pay the full Pell Grant to the student, but you may not pay other FSA funds to the student, because his/her financial need has already been met.

PACKAGING RULES FOR ACG/SMART, CAMPUS-BASED AID AND STAFFORD/PLUS LOANS

You should consider a number of things when developing a packaging policy. For instance, some schools give more grant assistance to beginning students, who may have more difficulty adjusting to campus life, increasing the proportion of loans and work-study in subsequent years.

For the Campus-Based programs and other programs where the available funds may not be sufficient to meet every eligible student's need, some schools decide to give a higher proportion of aid to the neediest students. Other schools award funds as an equal proportion of each student's need.

Examples of Estimated Financial Assistance

Estimated Financial Assistance includes any educational benefits paid because of enrollment in postsecondary education, such as:

- the student's Pell Grant eligibility;
- unsubsidized and subsidized Stafford and PLUS (Federal Family Education Loans and Direct Loans);
- Chapter 1607/REAP Benefits;
- long-term loans made by the school, including Federal Perkins Loans (short-term emergency loans are not considered to be Estimated Financial Assistance);
- grants, including Federal Supplemental Educational Opportunity Grants (FSEOGs), ACG/National SMART

grants, state grants, and Reserve Officer Training Corps (ROTC) living allowances;

- scholarships, including athletic scholarships and ROTC scholarships, and scholarships that require future employment but are given in the current year;
- waivers of tuition and fees;
- fellowships or assistantships;
- income from insurance programs that pay for the student's education;
- net income from need-based employment; and
- AmeriCorps funds;
- veterans educational benefits

NOTE:

- You may exclude from Estimated Financial Assistance, up to the amount of any subsidized DL or FFEL that you award to the student when the student received AmeriCorps or Chapter 30 benefits.
- When awarding subsidized DL or FFEL, you may exclude the entire amount of Americorps benefits or Chapter 30 veterans educational benefits from Estimated Financial Assistance.

Many schools use software, such as the Packaging module in EDEExpress, that can be configured to implement the school's packaging philosophy. For instance, in EDEExpress, you can specify the order in which aid sources are to be applied to the student's unmet need, and set overall percentage limits on the amount of gift (grants/scholarships) and self-help aid that will be included in the aid package.

Estimated Financial Assistance

In contrast to Pell, you must take other aid into account when awarding ACG/SMART, campus-based aid, Stafford or PLUS loans. As noted earlier, the other aid that must be considered is called "estimated financial assistance" (EFA).

In general, the term *estimated financial assistance, as defined for the Campus-Based programs, and ACG/National SMART Grants*, refers to aid from the FSA programs, as well as grants, scholarships, loans, and need-based employment that you can reasonably anticipate at the time you award aid to the student, whether the assistance is awarded by the school or by an individual or organization outside the school.

The term *estimated financial assistance* is used in the same way for Stafford/PLUS purposes as for the Campus-Based programs. However, there are differences in the treatment of Americorps Chapter 30 benefits (discussed later in this chapter).

The regulations specify that "estimated financial assistance" is aid that the student will receive for the same period of enrollment as the Stafford or PLUS loan. As noted in Chapter 1, it's usually best to certify a Stafford or PLUS loan for a period that matches the academic year or other period that you're using to award funds from other FSA programs.

Considering grants and subsidized loans first

The law requires aid administrators to find out whether the student is eligible for certain other FSA programs that would reduce the need for borrowing.

If your school participates in the Federal Pell Grant Program, you must include the student's estimated Pell Grant eligibility as Estimated Financial Assistance when making Campus-Based awards, whether or not the student has received the Pell Grant at the time you make your Campus-Based award.

Similarly, you must determine an undergraduate student's Pell Grant eligibility before certifying a subsidized or unsubsidized Stafford Loan for that student. In addition, you may not certify an unsubsidized Stafford Loan without first determining the student's need for a subsidized Stafford Loan. (The difference between subsidized and unsubsidized Stafford Loans is explained in *Chapter 5* of this Volume.) However, if the amount of the subsidized Stafford is \$200 or less and the amount can be included as part of an unsubsidized Stafford Loan, you are not required to certify a separate subsidized loan.

HERA Change to Estimated Financial Assistance

HEA Sec. 480(j), DCL GEN 06-05

If the source of assistance is a State and is designated by the State to offset a specific component of the student's COA, the amount of that assistance may be excluded from both COA and Estimated Financial Assistance. You may exclude such assistance on a student-by-student basis, but if it is excluded, it must be excluded for both COA and Estimated Financial Assistance. If the amount excluded is less than the allowance provided in the student's COA, you must exclude the lesser amount.

Prepaid tuition plans

GEN-06-05, HEA Sec. 480(f) & (j)

prepaid tuition plans, as well as Coverdell education savings accounts and 529 savings accounts are no longer considered EFA; instead, the distribution from the value of the account is considered an asset of the owner of the account, unless the owner of the account is a dependent student. When the owner is a dependent student, the value of the account is excluded from the reported amount of both the student's and parents' assets.

Packaging when choosing not to borrow Stafford

Note that if the student for whom a parent is borrowing a PLUS Loan chooses not to apply for a Stafford Loan, the Stafford Loan amount that the student would have been eligible to receive is *not* counted as estimated financial assistance when determining the amount of the PLUS Loan.

Note that the same principle applies when a graduate/professional student is eligible for Stafford, but chooses to borrow only PLUS. The Stafford amount that the student would have been eligible to receive is not counted as EFA when determining the PLUS amount that the student may borrow.

Requirement to consider grants and sub loans first

34 CFR 682.201(a), 34 CFR 685 200(a)

Use net FWS earnings when packaging

To determine the net amount of a student's FWS earnings that will be available to help pay for the student's costs, you must subtract estimated taxes and job-related costs from the student's gross FWS earnings (see Chapter 6 - Campus-Based Awards).

Basic packaging example

Cost=\$12,500	unmet need 10,000	\$12,500 Cost
	EFC \$2,500	- 2,500 EFC
		\$10,000 Need

Andrew is a dependent student, returning as a sophomore to Lebold College. For academic purposes, Lebold College considers him to be a 2nd-year student. His cost of attendance is \$12,500, and his EFC for the current year is 2500; therefore, the packaging process begins with \$10,000 in unmet need.

Cost=\$12,500	unmet need \$5,700	\$12,500 Cost
	Pell, ACG, WCF \$4,300	- 2,500 EFC
	EFC \$2,500	- 1,600 Pell Grant
		- 1,300 ACG Grant
		- 1,400 Scholarship
		\$ 5,700 Remaining Need

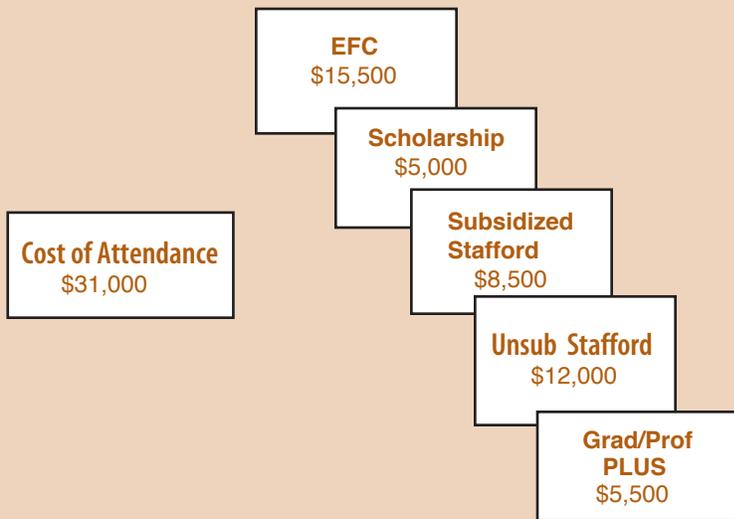
The aid administrator at Lebold College begins by awarding ACG and Pell Grants and applying the outside scholarship before awarding Campus Based aid. Andrew's Estimated Financial Assistance is a \$1,600 Pell, a \$1,300 ACG and a \$1,400 outside scholarship from the Wildwood Conservation Fund, so he has sufficient need for the maximum awards that the aid administrator can make under Lebold's policy for Campus-Based funds: \$800 FSEOG, a \$900 Perkins Loan, and \$1,800 in FWS employment.

Cost=\$12,500	unmet need \$2,200	\$12,500 Cost
	C-B Aid \$3,500	- 2,500 EFC
	Pell & WCF \$3,000	- 1,600 Pell Grant
	EFC \$2,500	- 1,300 ACG Grant
		- 1,400 Scholarship
		- 800 FSEOG
		- 900 Perkins
		- 1,800 FWS
		\$ 2,200 Remaining Need

The aid administrator at Lebold College finishes the packaging process by awarding Title IV loans available to meet Andrew's need. As a 2nd-year student, Andrew's Stafford loan limit is \$4,500. Because his remaining need is \$2,200, he can receive that amount as a subsidized Stafford Loan. If he chooses, he can borrow up to \$2,300 unsubsidized Stafford to partially cover the EFC. Since he is a dependent student, his parents can borrow up to the remaining amount of the EFC in the form of a PLUS Loan. As an alternative to Andrew borrowing an additional \$2,300 in unsubsidized Stafford, his parents could borrow that full amount in a PLUS.

Graduate/Professional PLUS Packaging Example

Kent enrolls in a graduate-level program at Falcon University with a total Cost of Attendance \$31,000. Kent has already been awarded a graduate scholarship of \$5,000. Kent is a graduate student, so his annual loan limit is \$20,500 (maximum \$8,500 subsidized). Kent is eligible to receive a subsidized Stafford loan of \$8,500. Kent now has \$2,000 in remaining need. Next, he can receive \$12,000 in unsubsidized Stafford (\$2,000 in need and \$10,000 partially covering the EFC) Finally, Kent can receive a PLUS loan for \$5,500 to cover the remaining portion of the EFC.



Using Loan Funds to Replace the EFC: Dependent example

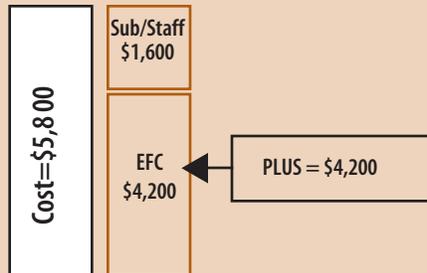
Darien is a first-year dependent student at Bald Eagle Community College. His cost of attendance is \$5,800 and his ISIR shows that he has an EFC of 4,200, so his financial need is \$1,600. Darien's EFC makes him ineligible for a Pell Grant, and BECC does not participate in the Campus-Based programs. The Stafford annual loan limit for a first year dependent student is \$3,500. Darien qualifies for a \$1,600 subsidized Stafford loan, and has no remaining need.

\$ 5,800	Cost
- 4,200	EFC
\$ 1,600	Need

Since an unsubsidized Stafford Loan can replace the EFC and Darien hasn't reached the Stafford annual loan limit, he can borrow an additional \$1,900 in the form of an unsubsidized Stafford Loan to cover part of the EFC. (\$3,500 Stafford annual loan limit - \$1,600 subsidized Stafford Loan=\$1,900 unsubsidized Stafford eligibility.) Darien could borrow \$1,900 in unsub Stafford to partially cover the EFC. His parents could then borrow \$2,300 in PLUS to cover the remaining EFC. Alternately, his parents could borrow up to \$4,200 in the form of a PLUS loan.

\$ 5,800	Cost
- 1,600	Sub Stafford
- 1,900	Unsub Stafford
- 2,300	PLUS
\$ 0	Need

Replaces EFC



Using Loan Funds to Replace the EFC: Independent example

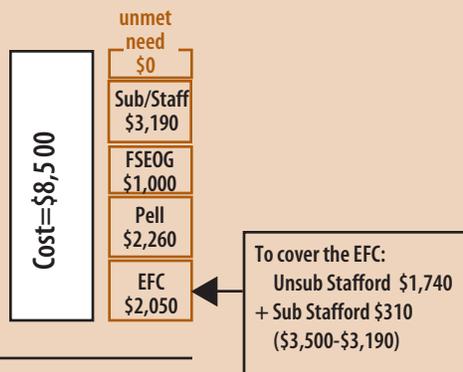
Holly Beth enrolls in Vincent Technical College as a 1st-year independent student with an \$8,500 cost of attendance and VTC has received an ISIR for her with an EFC of 2,050. She is eligible for a \$2,260 Pell Grant and VTC also awards her a \$1,000 FSEOG. Her remaining need is \$3,190, so she can receive that amount in a subsidized Stafford Loan (the maximum subsidized Stafford loan for a 1st-year student is \$3,500).

\$ 8,500	Cost
- 2,050	EFC
\$ 6,450	Need

Since Holly Beth is an independent student, she can take out an additional unsubsidized Stafford loan to replace the EFC, and as "self-help" to meet the EFC. Thus, VTC is able to award Holly Beth an additional \$2,050 in unsubsidized Stafford Loan funds (\$1,740 in unsubsidized Stafford and \$310 in subsidized Stafford).

\$ 8,500	Cost
- 2,260	Pell Grant
- 1,000	FSEOG
- 3,190	Sub Stafford
- 2,050	Unsub Stafford
\$ 0	Need

Unmet Need + EFC



Packaging Graduate/Professional PLUS

A PLUS loan does not count against a graduate/professional student's unsubsidized Stafford annual or aggregate loan limits.

For a dependent student, you may certify a PLUS and disburse Parent PLUS funds without determining the student's Pell Grant and subsidized Stafford Loan eligibility. Determining Pell eligibility is not relevant for Grad PLUS, but (unlike Parent PLUS) your school must determine a grad/professional student's maximum subsidized/unsubsidized Stafford eligibility before the student applies for PLUS.

Substituting unsubsidized loans for the EFC

A school may substitute certain types of loans for the student's expected family contribution (EFC). Generally, loans that may replace the student's EFC include unsubsidized Stafford Loans, PLUS Loans, state loans, private education loans, and any other non need based loans. If these loans are used to substitute for EFC, loan amounts that exceed the EFC are counted as estimated financial assistance.

You must package Campus-Based funds and subsidized Stafford loans before unsubsidized loans; as such, treatment of unsubsidized loans only becomes a factor when awarding unsubsidized Stafford and PLUS loans. When awarding Stafford/PLUS loans, unsubsidized loan amounts are only counted in *estimated financial assistance* if they exceed the EFC.

COUNTING NEED-BASED EARNINGS AS ESTIMATED FINANCIAL ASSISTANCE

The treatment of earnings from a job sometimes presents a problem—should the earnings be reported as income in need analysis or should they be counted as a form of student aid in the packaging process?

Net earnings from *need-based employment* are considered to be student aid. "Need-based employment" means employment that is awarded by the school itself or by another organization to a student on the basis of financial need to meet educational expenses for the award year. Only income from *need-based* employment may be considered as student aid. A Federal Work-Study job is clearly a form of need-based student aid. Employment with a state is considered to be student aid if that employment is based on the student's financial need for assistance to pay for educational expenses.

Non-need-based earnings are not to be considered as a resource for the current award year because they will be reported as income on the Free Application for Federal Student Aid (FAFSA) for the subsequent award year and will be used in calculating the future EFC. An example of non-need-based employment would be a job a student locates on her own with a private employer such as a local grocery store. Another example would be a job cleaning the labs in the Chemistry Department on campus, if the Chemistry Department hired the student using non-need-based criteria and funds.

CROSSOVER PERIODS

Crossover periods are payment, award, or loan periods that overlap two award years. In general, you may choose which award year EFC to use for a student, with two exceptions: When more than six months of a Pell Grant or ACG/SMART grant recipient's payment period falls into one award year, the payment period must be placed in that year, and when awarding FWS to a student not attending classes, the EFC for the next period of enrollment must be used.

The following chart summarizes the key flexibilities and options in handling crossover payment periods in the major Title IV programs. Note that for the award year selected, the student must have an official EFC calculated by the CPS, and for a Pell Grant the CPS must also have processed a valid SAR or ISIR.

Crossover in Pell

For more detail on calculating Pell awards in crossover, summer, minisession, and transfer situations, see Volume 3, Chapter 3.

EFCs for periods other than 9 months

For detail on how to handle FFEL, Direct Loans, and Campus-Based Programs that are based on an enrollment period of other than 9 months, see Alternate EFCs in Chapter 3 of Volume 1 of the FSA Handbook.

Handling Crossover Periods for Title IV Programs						
FSA Program	Applicable crossover period	Choice of award year EFC?	Use same award year EFC for all students in crossover period?	Use same award year, EFC, COA, and need to award a student other aid from FSA?	Use funds from the same award year as EFC?	Choice of academic year for annual loan limit regardless of award year EFC used?
Pell Grant	Payment period	Yes, unless more than 6 months of payment period is in one award year	No	Not applicable	Yes	Not applicable
ACG/National SMART	Payment period	Yes	No	Yes, except for Pell Grant	No, disbursement from award year in which Pell Grant was received	Not applicable
Perkins	Payment period	Yes	No	Yes, except for Pell Grant	No	Yes, but it is an award year limit. Choice still applies regardless of the disbursement award year
FWS	Award period	Yes, if student attending classes. (If student not attending, must use EFC for next period of enrollment)	No	Yes, except for Pell Grant	No, disbursement from award year in which hours were worked	Not applicable
FSEOG	Payment period	Yes	No	Yes, except for Pell Grant	No	Not applicable
FFEL/DL	Loan Period	Yes	No	Yes, except for Pell Grant	Not applicable	Yes, for term-based credit-hour programs using SAY. Not relevant for BBAY.

Veterans and Americorps benefits

The definition of “estimated financial assistance” in the FFEL and DL regulations includes veterans *active duty benefits* (veterans’ educational benefits paid under Chapter 30, 31, 32, and 35 of Title 38) and *national service education awards or post-service benefits* under title I of the National and Community Service Act of 1990 (AmeriCorps). An exception in the HEA to the above is that Chapter 30 is not considered Estimated Financial Assistance when determining eligibility for a subsidized Stafford loan.

FFEL: 34 CFR 682.200

DL: 34 CFR 685.102

Your school may exclude a portion of a subsidized Stafford loan from resources, not to exceed the amount of Chapter 30 veterans benefits or Americorps benefits, is described in the General Provisions for the Campus-Based programs.

34 CFR 673.5(c)(4)

Treatment of Combat Pay

GEN-05-16, Q&A # 17

PACKAGING VETERANS BENEFITS, AMERICORPS, VOCATIONAL REHABILITATION FUNDS, & BIA GRANTS

Veterans and Americorps benefits

For FSA purposes, veterans education benefits are treated as estimated financial assistance (EFA), not as income, and therefore are not reported as income on the FAFSA. Americorps benefits are also considered Estimated Financial Assistance. However, you may exclude as EFA a portion of any subsidized DL or FFEL loan that is equal to or less than the amount of the student’s Chapter 30 Montgomery GI Bill benefits and/or Americorps benefits paid for the cost of attendance.

Note that the income earned from the Veterans Affairs Student Work-Study Allowance Program (VASWSAP) is not treated as a veterans education benefit, so it is *not* considered estimated financial assistance. It should be reported as untaxed income (not income earned from work) on the FAFSA.

Chapter 30 Montgomery GI Bill benefits and Americorps benefits are *not* included in estimated financial assistance when determining eligibility for *subsidized* Stafford loans, but they *are* included for *unsubsidized* Stafford loans.

Noneducational veterans benefits are not counted as estimated financial assistance. Noneducational veterans benefits include Death Pension and Dependency and Indemnity Compensation (DIC) benefits, and income from the Veterans Affairs Student Work-Study Allowance Program (VASWSAP). The student must report these noneducational benefits as nontaxable income on the FAFSA.

Packaging example: Veteran educational benefits exclusion

Penny is a first-year, independent undergraduate student with an EFC of 1800, a Pell Grant of \$2,560, and Chapter 30 Montgomery GI Bill benefits of \$9,600. She enrolls in a four-year program at Frisson College, where her need is \$13,100 (\$14,900 COA - 1800 EFC). After considering her Pell grant and GI Bill benefits, Penny's remaining need is \$940, so it appears that she is eligible for a subsidized Stafford loan for that amount.

	\$14,900 COA
less	<u>\$1,800 EFC</u>
	\$13,100 Need
less	<u>\$2,560 Pell Grant</u>
	\$10,540
less	<u>\$9,600 Ch 30 VA Benefits</u>
	\$940 remaining need

However, Chapter 30 veterans' benefits do not count as Estimated Financial Assistance for subsidized loans. Penny's need less her Pell Grant without consideration for the Chapter 30 VA benefits produces a need of \$10,540. As a 1st year independent undergraduate student, she can receive the full annual maximum of \$3,500. At this point her aid package includes the following:

	\$13,100 need
less	<u>\$ 2,560 Pell</u>
	\$10,540
less	<u>\$3,500 Subsidized Stafford</u>
	\$7,040 remaining need

Frisson can now consider her for Campus-Based aid if they choose to exclude the subsidized loan (up to and not to exceed the amount of the VA active-duty benefits). For example Penny has \$13,100 remaining need, less her \$2,560 Pell Grant, less \$9,600 in VA benefits:

	\$13,100 Need
less	<u>\$2,560 Pell</u>
	\$10,540
less	<u>\$9,600 VA Benefits</u>
	\$940 Remaining need
less	\$940 FSEOG

So, Penny's aid package totals as below:

	\$2,560 Pell
	\$9,600 VA Benefits
	\$ 940 FSEOG
	<u>\$3,500 Subsidized Stafford</u>
	\$16,600

Even though Penny's assistance now totals \$16,600 (more than her COA of \$14,900), which exceeds her need AND her cost of attendance, this is not considered an overaward or overpayment.

Vocational rehabilitation funds

If you have a student who qualifies for both FSA funds and for vocational rehabilitation assistance funds, you should determine the student's package exclusive of both the costs related to the student's disability and anticipated vocational rehabilitation assistance. In this way, the student with disabilities will be offered the same aid package as a student who is in the same financial situation but who doesn't have disabilities; the student with disabilities will also receive the maximum amount of vocational rehabilitation aid to which he or she is entitled. If the vocational rehabilitation agency doesn't fully meet the student's disability costs, you may wish to include the unmet disability expenses in the student's cost of attendance, and increase his or her aid award.

Although the vocational rehabilitation funds shouldn't be considered estimated financial assistance when you initially package aid for the student, you must coordinate funds available from the vocational rehabilitation agency and from institutional, state, and federal student financial assistance programs to prevent an overaward. The amount of assistance from the vocational rehabilitation agency must be documented in the student's file.

Coordination with Bureau of Indian Affairs grants

When packaging campus-based aid for a student who is or may be eligible for a Bureau of Indian Affairs (BIA) grant, you must first develop a financial aid package without considering any BIA funds. If the total aid package—after BIA funds are added—does not exceed the student's need, no adjustment may be made to the aid package. If the total package plus the BIA grant does exceed need, you must eliminate the excess in the following sequence: loans, work-study awards, and grants other than Pell Grants. (You may *not* reduce a Pell Grant or BIA grant.) You may alter this sequence of reductions upon the student's request if you believe it would benefit the student. We encourage you to consult with area officials in charge of BIA postsecondary financial aid when packaging FSA funds with BIA grants.

Reserve Educational Assistance Program (REAP or Chapter 1607

A new veterans education benefit program referred to as REAP or Chapter 1607 was signed into law on October 28, 2004. It is for reservists who serve on active duty on or after September 11, 2001, under Title 10 U.S.C. for a contingency operation and who serve at least 90 consecutive days or more. National Guard members also are eligible if their active duty is under section 502(f), Title 32 U.S.C. and they serve for 90 consecutive days when authorized by the President or Secretary of Defense for a national emergency and that active duty is supported by federal funds. Disabled members who are injured or have an illness or disease incurred or aggravated in the line of duty and who are released from active duty before completing 90 consecutive days are also eligible. The U.S. Department of Defense will identify contingency operations that qualify for benefits under Chapter 1607.

Vocational rehabilitation agreements with state agencies

Some state vocational rehabilitation agencies have established agreements with schools that specify how vocational rehabilitation assistance will be coordinated with other forms of financial aid. Check with your school's vocational rehabilitation coordinator to see if it has such an agreement.

Vocational Rehabilitation Packaging

Trevor has \$4,000 in vocational rehabilitation aid for the 07-08 academic year. At Friedman University, Trevor has a COA of \$5,000. He is eligible for a \$4,000 Pell Grant. Friedman must coordinate funding with the vocational rehabilitation agency to ensure that Trevor's total financial aid package, including both Title IV and vocational rehabilitation, does not exceed his need. Trevor has \$2,000 of disability costs that are not met by his vocational rehabilitation award, so \$2,000 may be added to his COA.

BIA Grants

34 CFR 673.6

Packaging Byrd Scholarships with other FSA funds

Under Byrd regulations that took effect in September 1993, the State Education Agency awarding the Byrd Scholarship must ensure that the total amount of federal financial aid awarded to the Byrd Scholar does not exceed the scholar's total cost of attendance. If any federal loans are part of the scholar's financial aid package, they must be reduced prior to reducing the Byrd Scholarship. If the scholar is receiving a Pell Grant, though, the Byrd Scholarship must be reduced prior to reducing the Pell Grant. Section 419 J of the Higher Education Act, as amended, states that a Federal Pell Grant must not be reduced on the basis of the receipt of a Byrd Scholarship.

**Reserve Educational Assistance Program
(REAP/Chapter 1607)**

DCL GEN-05-16

As with all veterans benefits, Chapter 1607 benefits are not taxable and will not be used in the EFC calculation. However, Chapter 1607 benefits are considered EFA under the Campus-Based regulations (34 CFR 673.5) and under the FFEL and the Direct Loan Program regulations (34 CFR 682.200 and 34 CFR 685.102).

A school must account for REAP/Chapter 1607 benefits as “estimated financial assistance,” beginning with the 2005-2006 award year, excluding retroactive payments made for previous award years.

Campus-based overaward thresholds

Campus-based aid need not be reduced if the overaward doesn't exceed \$300, which is the overaward threshold for all Campus-based programs. Note that the \$300 threshold is allowed only if an overaward occurs after Campus-based aid has been packaged and the school was unaware, the student would receive additional funds.

The threshold does not allow a school to deliberately award Campus-based aid that, in combination with other resources, exceeds the student's financial need. (see Volume 5 - Overawards, Overpayments, & Withdrawal Calculations.)

ACG/SMART Overaward limitation

HEA 401A(d)(1)(B)(i)

34 CFR 691.62(c)

TREATMENT OF OVERAWARDS

If, at any time during the award period, the student receives additional Estimated Financial Assistance that were not considered in calculating the student's eligibility for Campus-Based and/or ACG/SMART aid and if the Estimate Financial Assistance combined with the expected financial aid will exceed the student's need, the amount in excess of the student's need is considered an overaward.

The treatment of overawards in the Stafford/PLUS programs depends on whether the loans have been fully disbursed. See Chapter 1 of *Volume 5* of the *FSA Handbook* for a full discussion of overawards.

There is a \$300 overaward tolerance for the Campus-Based programs. If the student's package is overawarded by \$300 or less (as a result of a late outside award, not the school's awarding methodology) and Campus Based funds are part of the package, you can consider the student to not be overawarded; however, this overaward tolerance does not apply if the student has a ACG/SMART grant as part of his/her aid package.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Assumptions for case studies 1 through 12

- Students enroll in a 124-semester-hour bachelor’s degree program with an academic year of 24 semester hours and 30 weeks of instructional time.
- The educational program consists of two semesters, fall and spring, with 15 weeks of instructional time each and the summer term is 10 weeks of instructional time in length with full-time equal to 12 semester hours.
- A student is considered to advance in grade level based on earning 30 semester hours.
- Students meet all student eligibility requirements for any term apart from academic year progression.
- All assumptions concerning weeks, apart from credits accepted on transfer, apply only to traditional-calendar, standard-term programs.
- Case study charts show the credit hours and weeks of instructional time completed in each term plus the total accumulated by the end of the term in parentheses.

Chart for identifying academic years

The following chart provides a look-up table for determining the academic year of a student based on the weeks of instructional time and semester hours completed. For example, a student who has completed 30 weeks of instructional time and 24 credits but not completed either 60 credits or 48 credits, would be in his or her second academic year, while another student who has completed 120 weeks of instructional time and 96 credits is no longer eligible due to being beyond his or her fourth academic year except as provided in Dear Colleague letter GEN-06-18. Under DCL GEN-06-18, for the 2006-7 and 2007-8 award years, the student’s fourth year of eligibility is considered to extend until the student completes his or her degree program to the extent the student has remaining eligibility from a fourth-year award.

Academic Year Progression				
Weeks of Instructional Time and Semester-Hour Credits				
Element Completed	<30 weeks*	≥30 but <60 weeks*	≥60 but <90 weeks*	≥90 but <120 weeks*
<24* credits	AY 1	AY 1	AY 1	AY 1
≥24 but <48* credits	AY 1	AY 2	AY 2	AY 2
≥48 but <72* credits	AY 1	AY 2	AY 3	AY 3
≥72 but <96* credits	AY 1	AY 2	AY 3	AY 4
* Note that if a student meets or exceeds the maximum in one measure but not the other, the student has not progressed to the next academic year until both measures are met or exceeded.				

Case Study 1: Tom

Institution does an exact accounting (§691.6 (a), (b), and (c))

- Tom graduates from high school with no postsecondary credits, e.g., AP/IB or colleges courses taken as a nonregular student.
- He attends full-time for 9 semesters and the summer between his second and third fall/spring semesters; 4 hours in semester 10.
- He declares a major in topology and foundations (CIP code 27.0105) at the beginning of his third semester.

Point illustrated

- Summer term only counts as 10 weeks of instructional time and delays the start of the fourth academic year for a National SMART Grant to his seventh semester.

Notes

- Entering semester 3, Tom has accrued 24 credits over 30 weeks of instructional time. He is still a freshman because he has not accrued 30 credits, but he is eligible for second-year ACG because his 24 credits and 30 weeks of instructional time completed in the first two semesters constitute his first full title IV academic year in any eligible program.
- After attending the 10-week summer session, he earns 12 credits but over fewer weeks than a regular semester contains. As a result, by the time he begins semester 6, he has completed three academic years of credits ($3 * 24 = 72$), but has less than three academic years in weeks of instructional time (85 instead of 90 ($3 * 30 = 90$)). Since he is not yet in his fourth academic year, he cannot move to the fourth-year grant level, but he has already exhausted his third-year Scheduled Award. He, therefore, may not receive a National SMART Grant disbursement for semester 6.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 1: Tom

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12	15	Freshman	ACG 1	
Semester 2	12 (24)	15 (30)	Freshman	ACG 1	
Summer 1					
Semester 3	12 (36)	15 (45)	Freshman	ACG 2	Declares major
Semester 4	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 2	12 (60)	10 (70)	Sophomore	NSG 3	
Semester 5	12 (72)	15 (85)	Junior	NSG 3	
Semester 6	12 (84)	15 (100)	Junior		
Summer 3					
Semester 7	12 (96)	15 (115)	Junior	NSG 4	
Semester 8	12 (108)	15 (130)	Senior	NSG 4	
Summer 4					
Semester 9	12 (120)	15 (145)	Senior		
Semester 10	4 (124)	15 (160)	Senior		Pell < half-time
Summer 5					

Case Study 2: Margaret

Institution does an exact accounting (§691.6 (a), (b), and (c))

- Margaret graduates from high school with no postsecondary credits.
- She attends half-time for semesters 1 to 4 and then full-time for 8 semesters; 4 hours in semester 13.
- She declares a major in pathology (CIP code 26.0910) at the beginning of her third semester.

Point illustrated

- Duration of eligibility continues even in payment periods for which a student is not eligible. Margaret never receives a first academic year award since she does not attend full-time during the period when she completes her first academic year in credits and weeks.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 2: Margaret

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	6	15	Freshman		< full-time
Semester 2	6 (12)	15 (30)	Freshman		< full-time
Summer 1					
Semester 3	6 (18)	15 (45)	Freshman		< full-time Declares major
Semester 4	6 (24)	15 (60)	Freshman		< full-time
Summer 2					
Semester 5	12 (36)	15 (75)	Freshman	ACG 2	
Semester 6	12 (48)	15 (90)	Sophomore	ACG 2	
Summer 3					
Semester 7	12 (60)	15 (105)	Sophomore	NSG 3	
Semester 8	12 (72)	15 (120)	Junior	NSG 3	
Summer 4					
Semester 9	12 (84)	15 (135)	Junior	NSG 4	
Semester 10	12 (96)	15 (150)	Junior	NSG 4	
Summer 5					
Semester 11	12 (108)	15 (165)	Senior		
Semester 12	12 (120)	15 (180)	Senior		
Summer 6					
Semester 13	4 (124)	15 (195)	Senior		Pell < half-time

Case Study 3: Joan

Institution does an exact accounting except assume weeks for summer (§691.6(d); applicable only to programs using Formula 1 or Formula 2)

- Joan graduates from high school with no postsecondary credits.
- She attends full-time for 10 semesters and the summer between her second and third fall/spring semesters.
- She declares a major in solid state physics (CIP code 40.0808) at the beginning of her third semester.

Point illustrated

- To the extent the institution does not do an exact accounting of the weeks of instructional time for summer, the institution may consider the 10-week summer term to count as 15 weeks of instructional time in determining Joan's academic year progression based on summer being treated as $\frac{1}{2}$ of an academic year in weeks of instructional time under §691.6(d) of the current program regulations.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 3: Joan

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12	15	Freshman	ACG 1	
Semester 2	12 (24)	15 (30)	Freshman	ACG 1	
Summer 1					
Semester 3	12 (36)	15 (45)	Freshman	ACG 2	Declares major
Semester 4	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 2	12 (60)	15 (75)	Sophomore	NSG 3	Summer = 15 wk
Semester 5	12 (72)	15 (90)	Junior	NSG 3	
Semester 6	12 (84)	15 (105)	Junior	NSG 4	
Summer 3					
Semester 7	12 (96)	15 (120)	Junior	NSG 4	
Semester 8	12 (108)	15 (135)	Senior		
Summer 4					
Semester 9	12 (120)	15 (150)	Senior		
Semester 10	12 (132)	15 (165)	Senior		Pell < half-time because she only needs 4 credits to complete degree

Case Study 4: Lee

Institution assumes weeks based on counting terms (§691.6 (d) and private-letter guidance for 6-7 and 7-8 award years)

- Lee graduates from high school with no postsecondary credits.
- He attends full-time for 10 semesters and the summer between his second and third fall/spring semesters.
- He declares a major in naval architecture (CIP code 14.2201) at the beginning of his third semester.

Point illustrated

- To the extent the institution does not do an exact accounting of the weeks of instructional time for summer, under §691.6 (d) of the program regulations, the institution is able to treat summer as an equivalent term to the fall and spring terms in weeks of instructional time.
- By counting weeks based on terms attended the institution assumes any term is $\frac{1}{2}$ of an academic year, Lee receives credit for 15 weeks of instructional time for attending a summer term. His fourth-year National SMART Grant starts in the sixth semester unlike Tom whose fourth year did not start until his seventh semester.
- Note: If the program used payment Formula 2 and had a 14-week semester and a 15-week semester, each term, including summer, would count as 14.5 weeks of instructional time, i.e., $\frac{1}{2}$ of the fall through spring terms. Since no two terms can equal more than 29 weeks, you would not round up the fraction. Alternatively, under §691.6 (d) may treat summer as one-half of an academic year, 15 weeks, while the fall and spring terms would count as 14.5.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 4: Lee

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12	15	Freshman	ACG 1	
Semester 2	12 (24)	15 (30)	Freshman	ACG 1	
Summer 1					
Semester 3	12 (36)	15 (45)	Freshman	ACG 2	Declares major
Semester 4	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 2	12 (60)	15 (75)	Sophomore	NSG 3	10-wk summer term credited as 15 wks
Semester 5	12 (72)	15 (90)	Junior	NSG 3	
Semester 6	12 (84)	15 (105)	Junior	NSG 4	
Summer 3					
Semester 7	12 (96)	15 (120)	Junior	NSG 4	
Semester 8	12 (108)	15 (135)	Senior		
Summer 4					
Semester 9	12 (120)	15 (150)	Senior		
Semester 10	12 (132)	15 (165)	Senior		Pell < half-time

Case Study 5: Denise

Institution assumes weeks of i.t. based on hours (DCL GEN-06-18 for 6-7 and 7-8 award years)

- Denise graduates from high school with no postsecondary credits.
- She attends full-time for 9 semesters and the summer between her second and third fall/spring semesters; 4 hours in semester 10.
- She declares a major in neuropharmacology (CIP code 26.1003) in her third semester.

Point illustrated

- By assuming weeks of instructional time based on credit hours earned, 15 weeks of instructional time are attributed to the 12 hours earned in the 10-week summer term.
- The hours completed in the tenth semester equate to fewer weeks of instructional time.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 5: Denise

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12	15	Freshman	ACG 1	
Semester 2	12 (24)	15 (30)	Freshman	ACG 1	
Summer 1					
Semester 3	12 (36)	15 (45)	Freshman	ACG 2	Declares major
Semester 4	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 2	12 (60)	15 (75)	Sophomore	NSG 3	12 hrs of summer credited as 15 wks
Semester 5	12 (72)	15 (90)	Junior	NSG 3	
Semester 6	12 (84)	15 (105)	Junior	NSG 4	
Summer 3					
Semester 7	12 (96)	15 (120)	Junior	NSG 4	
Semester 8	12 (108)	15 (135)	Senior		
Summer 4					
Semester 9	12 (120)	15 (150)	Senior		
Semester 10	4 (124)	5 (155)	Senior		-Pell < half-time - Hours equate to only 5 weeks (4/24 * 30 = 5)

Case Study 6: George

Institution assumes weeks of i.t. based on hours (DCL GEN-06-18 for 6-7 and 7-8 award years)

- George graduates from high school with no postsecondary credits.
- He attends full-time for 9 semesters and the summer between his second and third fall/spring semesters; 4 hours in semester 10.
- He declares a major in hazardous materials management (CIP code 15.0508) in his eighth semester.

Points illustrated

- The delay in declaring a major affects George's National SMART Grant eligibility.
- By assuming weeks of instructional time based on credit hours earned, 15 weeks of instructional time are attributed to the 12 hours earned in the 10-week summer term.
- The hours completed in the tenth semester justify fewer weeks of instructional time.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 6: George

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12	15	Freshman	ACG 1	
Semester 2	12 (24)	15 (30)	Freshman	ACG 1	
Summer 1					
Semester 3	12 (36)	15 (45)	Freshman	ACG 2	
Semester 4	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 2	12 (60)	15 (75)	Sophomore		12 hours of summer credited as 15 wks
Semester 5	12 (72)	15 (90)	Junior		
Semester 6	12 (84)	15 (105)	Junior		
Summer 3					
Semester 7	12 (96)	15 (120)	Junior		
Semester 8	12 (108)	15 (135)	Senior	NSG 4	Declares major
Summer 4					
Semester 9	12 (120)	15 (150)	Senior	NSG 4	
Semester 10	4 (124)	5 (155)	Senior		- Pell < half-time - Hours equate to only 5 weeks (4/24 * 30 = 5)

Case Study 7: Cecilia

Institution does an exact accounting except transfer credits (§691.6(a), (b), and (c); Preamble, November 1, 2006 final regulations (71 FR 64404-64405))

- Cecilia transfers in 24 credits from a prior institution and received half of an ACG first-year Scheduled Award.
- She attends full-time for 8 semesters and 4 hours for the ninth semester.
- She declares a major in microbial and eukaryotic genetics (CIP code 26.0803) at the beginning of her third semester.

Points illustrated

- The institution assumes weeks of instructional time based on credits accepted on transfer. Therefore, Cecilia is considered to be in her second academic year for ACG in her first semester because the 24 credits accepted on transfer also equate to having completed 30 weeks of instructional time.
- Her GPA for second-year eligibility must be based on the grades of the credits accepted on transfer.
- The receipt of the ACG first-year award is not relevant to determining her academic year at her new institution. If she had received a portion of a second-year award but the institution accepted less than 24 credits on transfer, the institution would be required to consider her a second-year student. The GPA would be based on the credits accepted on transfer.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 7: Cecilia

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12 (36)	15 (45)	Freshman	ACG 2	Assume 30 wks
Semester 2	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 1					
Semester 3	12 (60)	15 (75)	Sophomore	NSG 3	Declares major
Semester 4	12 (72)	15 (90)	Junior	NSG 3	
Summer 2					
Semester 5	12 (84)	15 (105)	Junior	NSG 4	
Semester 6	12 (96)	15 (120)	Junior	NSG 4	
Summer 3					
Semester 7	12 (108)	15 (135)	Senior		
Semester 8	12 (120)	15 (150)	Senior		
Summer 4					
Semester 9	4 (124)	15 (165)	Senior		Pell < half-time

Case Study 8: Mary Beth

Institution does an exact accounting (§691.6(a), (b), and (c))

- Mary Beth starts college with 24 AP credits.
- She attends full-time for 8 semesters and 4 hours in the ninth semester.
- She declares a major in paleontology (CIP code 40.0604) at the beginning of her third semester.

Points illustrated

- AP credit counts toward completion of the credit hours of an academic year, but, since AP credit is not earned as part of attending an ACG or National SMART Grant eligible program, it does not have weeks of instructional time associated with the credits.
- Though Mary Beth has completed the first year in hours for academic year progression at the beginning of her enrollment, her weeks of instructional time mean she is in her first academic year on her first two semesters with a similar affect on her subsequent terms.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 8: Mary Beth

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12 (36)	15	Freshman	ACG 1	No wks for AP credit
Semester 2	12 (48)	15 (30)	Sophomore	ACG 1	
Summer 1					
Semester 3	12 (60)	15 (45)	Sophomore	ACG 2	Declares major
Semester 4	12 (72)	15 (60)	Junior	ACG 2	
Summer 2					
Semester 5	12 (84)	15 (75)	Junior	NSG 3	
Semester 6	12 (96)	15 (90)	Junior	NSG 3	
Summer 3					
Semester 7	12 (108)	15 (105)	Senior	NSG 4	
Semester 8	12 (120)	15 (120)	Senior	NSG 4	
Summer 4					
Semester 9	4 (124)	15 (135)	Senior		Pell < half-time

Case Study 9: Gabriel

Institution assumes weeks based on credits (DCL GEN-06-18 for 6-7 and 7-8 award years)

- Gabriel starts college with 24 AP credits.
- He attends full-time for 8 semesters and 4 hours in the ninth semester.
- He declares a major in paleontology (CIP code 40.0604) at the beginning of his third semester.

Points illustrated

- AP credit counts toward completion of the credit hours of an academic year; and by assuming weeks of instructional time based on the credits earned towards the ACG or National SMART Grant eligible program under the interim guidance in the DCL, Gabriel is assumed to have completed 30 weeks of instructional time.
- In his first term, Gabriel is considered to be in his second academic year for ACG with similar effects on subsequent eligibility.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 9: Gabriel

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	12 (36)	15 (45)	Freshman	ACG 2	30 wks for AP credit
Semester 2	12 (48)	15 (60)	Sophomore	ACG 2	
Summer 1					
Semester 3	12 (60)	15 (75)	Sophomore	NSG 3	Declares major
Semester 4	12 (72)	15 (90)	Junior	NSG 3	
Summer 2					
Semester 5	12 (84)	15 (105)	Junior	NSG 4	
Semester 6	12 (96)	15 (120)	Junior	NSG 4	
Summer 3					
Semester 7	12 (108)	15 (135)	Senior		
Semester 8	12 (120)	15 (150)	Senior		
Summer 4					
Semester 9	4 (124)	15 (165)	Senior		Pell < half-time

Case Study 10: Justin

Institutions do an exact accounting (§691.6(a), (b), and (c))

- Justin starts college with 30 AP credits.
- He attends full-time for 2 semesters at Crystal City College and receives an associate degree.
- He transfers to Pentagon City University, which accepts both the AP credits and the 30 credits earned at CCC.
- He declares a major in toxicology (CIP code 26.1004) at the beginning of his enrollment at PCU.

Points illustrated

- AP credit counts toward completion of the credit hours of an academic year, but, since AP credit is not earned as part of attending an ACG or National SMART Grant eligible program, it does not have weeks of instructional time associated with the credits.
- Because PCU is aware that 30 credits are AP credits, the institution considers Justin to be in his second academic year when he starts.

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 10: Justin

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	15 (45)	15	Sophomore	ACG 1	
Semester 2	15 (60)	15 (30)	Sophomore	ACG 1	
----- Transfers -----					
Summer 1					
Semester 3	15 (75)	15 (45)	Junior	ACG 2	PCU aware of AP Declares major
Semester 4	15 (90)	15 (60)	Junior	ACG 2	
Summer 2					
Semester 5	15 (105)	15 (75)	Senior	NSG 3	
Semester 6	15 (120)	15 (90)	Senior	NSG 3	
Summer 3					
Semester 7	4 (124)	15 (105)	Senior		Pell < half-time

Case Study 11: Joe

Institution does an exact accounting; other institution does exact accounting except assumes weeks for transfer and AP credits (§691.6(a), (b), and (c), Preamble, November 1, 2006 final regulations (transfer credits), and DCL GEN-06-18 (AP credits))

- Joe starts college with 30 AP credits.
- He attends full-time for 2 semesters at Crystal City College and receives an associate degree; CCC does not use DCL and does an exact accounting.
- He transfers to Pentagon City University, which accepts both the AP credits and the 30 credits earned at CCC.
- He declares a major in range science and management (CIP code 01.1106) at the beginning of his enrollment at PCU.

Points illustrated

- AP credits count toward completion of the credit hours of an academic year, but, since AP credit is not earned as part of attending an ACG or National SMART Grant eligible program, it does not have weeks of instructional time associated with the credits at CCC.
- Even though PCU is aware that 30 credits are AP credits, under assumptions using DCL guidance, the AP credits are considered to have weeks of instructional time at PCU and Joe is in his third academic year when he starts at PCU. Based on the 60 transfer and AP credits, PCU assumes Joe started with 75 weeks of instructional time ($60 \text{ [credits transferred/AP]} * 30 \text{ [weeks in ac yr]} / 24 \text{ [credits in ac yr]} = 75$).

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 11: Joe

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	15 (45)	15	Sophomore	ACG 1	Exact accounting; no wks with AP credits
Semester 2	15 (60)	15 (30)	Sophomore	ACG 1	
----- Transfers -----					
Summer 1					
Semester 3	15 (75)	15 (90)	Junior	NSG 3	-PCU aware of AP and assumes weeks for AP and transfer credits -Declares major
Semester 4	15 (90)	15 (105)	Junior	NSG4	
Summer 2					
Semester 5	15 (105)	15 (120)	Senior	NSG 4	
Semester 6	15 (120)	15 (1135)	Senior		
Summer 3					
Semester 7	4 (124)	15 (1150)	Senior		Pell < half-time

Case Study 12: Pat

Institutions do an exact accounting; second institution assumes weeks for transfer credits (§691.6(a), (b), (c) and Preamble, November 1, 2006 final regulations (transfer credits))

- Pat starts college with 30 AP credits.
- She attends full-time for 2 semesters at Crystal City College and receives an associate degree.
- She transfers to Pentagon City University, which accepts the 60 credits earned at CCC.
- She declares a major in artificial intelligence and robotics (CIP code 11.0102) at the beginning of her enrollment at PCU.

Points illustrated

- Because PCU is not aware that 30 credits are AP credits, the institution considers Pat to be in her third academic year when she starts based on credits accepted on transfer under the November 1, 2006 Preamble guidance. Based on the 60 transfer credits, PCU assumes Pat started with 75 weeks of instructional time ($60 \text{ [credits transferred/AP]} * 30 \text{ [weeks in ac yr]} / 24 \text{ [credits in ac yr]} = 75$).

Appendix A: CASE STUDIES: ACG/NSG academic year progression
 Requirements and Guidance for 2006-7 and 2007-8 for programs that qualify to use Formula 1

Case Study 12: Pat

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Semester 1	15 (45)	15	Sophomore	ACG 1	Exact accounting; no wks with AP credits
Semester 2	15 (60)	15 (30)	Sophomore	ACG 1	
----- Transfers -----					
Summer 1					
Semester 3	15 (75)	15 (90)	Junior	NSG 3	PCU <u>not</u> aware of AP* Declares major
Semester 4	15 (90)	15 (105)	Junior	NSG 4	
Summer 2					
Semester 5	15 (105)	15 (120)	Senior	NSG 4	
Semester 6	15 (120)	15 (135)	Senior		
Summer 3					
Semester 7	4 (124)	15 (150)	Senior		Pell < half-time

*Potential issue: NSLDS shows ACG 1 in prior year at CCC.

Assumptions for case study 13

- Students enroll in a 124-semester-hour bachelor’s degree program with an academic year of 24 semester hours and 30 weeks of instructional time.
- The educational program has nonstandard terms of 10 weeks of instructional time and full-time is 8 semester hours ((24*10)/30 = 8).
- A student is considered to advance in grade level based on earning 30 semester hours.
- Students meet all student eligibility requirements for any term apart from academic year progression.
- Case study charts show the credit hours and weeks of instructional time completed in each term plus the total accumulated by the end of the term in parentheses.

Chart for identifying academic years

The following chart provides a look-up table for determining the academic year of a student based on the weeks of instructional time and semester hours completed. For example, a student who has completed 30 weeks of instructional time and 24 credits but not completed either 60 credits or 48 credits, would be in his or her second academic year, while another student who has completed 120 weeks of instructional time and 96 credits is no longer eligible due to being beyond his or her fourth academic year except as provided in Dear Colleague letter GEN-06-18. Under DCL GEN-06-18, for the 2006-7 and 2007-8 award years, the student’s fourth year of eligibility is considered to extend until the student completes his or her degree program to the extent the student has remaining eligibility from a fourth-year award.

Academic Year Progression				
Weeks of Instructional Time and Semester-Hour Credits				
Element Completed	<30 weeks*	≥30 but <60 weeks*	≥60 but <90 weeks*	≥90 but <120 weeks*
<24* credits	AY 1	AY 1	AY 1	AY 1
≥24 but <48* credits	AY 1	AY 2	AY 2	AY 2
≥48 but <72* credits	AY 1	AY 2	AY 3	AY 3
≥72 but <96* credits	AY 1	AY 2	AY 3	AY 4
* Note that if a student meets or exceeds the maximum in one measure but not the other, the student has not progressed to the next academic year until both measures are met or exceeded.				

Case Study 13: Sophia

Institution does an exact accounting except transfer credits (§691.6(a), (b), and (c); Preamble, November 1, 2006 final regulations (71 FR 64404-64405))

- Sophia transfers in 24 credits from a prior institution and received half of an ACG first-year Scheduled Award.
- She attends full-time except for terms 2, 3, 4, and 12.
- She declares a major in environmental biology (CIP code 26.1305) at the beginning of her fifth term.

Points illustrated

- The institution assumes weeks of instructional time based on credits accepted on transfer. Therefore, Sophia is considered to be in her second academic year for ACG in her first semester because the 24 credits accepted on transfer also equate to having completed 30 weeks of instructional time.
- The institution must do an exact accounting of her academic year progression at the institution; the provisions for assuming weeks of instructional time in §691.6(d) and DCL GEN-06-18 do not apply. The GPA for second-year eligibility must be based on the grades of the credits accepted on transfer.
- The receipt of the ACG first-year award is not relevant to determining her academic year at her new institution. If she had received a portion of a second-year award but the institution accepted less than 24 credits on transfer, the institution would be required to consider her a second-year student. The GPA would be based on the credits accepted on transfer or, if doing an exact accounting across attendance at all institutions, the GPA for the coursework completed in the first-year at the prior institution.
- Sophia only receives one-third of her second-year ACG in her initial term since she attends as a less-than-full-time student for the rest of her second academic year and is not eligible.

Case Study 13: Sophia

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Term 1	10 (34)	10 (40)	Freshman	ACG 2	Assume 30 wks for transferred credits
Term 2	5 (39)	10 (50)	Sophomore		<full-time, not eligible
Term 3	5 (44)	10 (60)	Sophomore		<full-time, not eligible
Term 4	5 (49)	10 (70)	Sophomore		<full-time, not eligible
Term 5	10 (59)	10 (80)	Sophomore	NSG 3	Declares major
Term 6	10 (69)	10 (90)	Sophomore	NSG 3	
Term 7	10 (79)	10 (100)	Junior	NSG 3	
Term 8	10 (89)	10 (110)	Junior	NSG 4	
Term 9	10 (99)	10 (120)	Junior	NSG 4	
Term 10	10 (109)	10 (130)	Senior	NSG 4	
Term 11	10 (119)	10 (140)	Senior		
Term 12	5 (124)	10 (150)	Senior		

Assumptions for case study 14

- Students enroll in a 124-semester-hour bachelor’s degree program with an academic year of 24 semester hours and 30 weeks of instructional time.
- The educational program is a nonterm program with payment periods of 12 semester hours and 15 weeks of instructional time.
- A student is considered to advance in grade level based on earning 30 semester hours.
- Students meet all student eligibility requirements for any term apart from academic year progression.
- Case study charts show the credit hours and weeks of instructional time completed in each term plus the total accumulated by the end of the term in parentheses.

Chart for identifying academic years

The following chart provides a look-up table for determining the academic year of a student based on the weeks of instructional time and semester hours completed. For example, a student who has completed 30 weeks of instructional time and 24 credits but not completed either 60 credits or 48 credits, would be in his or her second academic year, while another student who has completed 120 weeks of instructional time and 96 credits is no longer eligible due to being beyond his or her fourth academic year except as provided in Dear Colleague letter GEN-06-18. Under DCL GEN-06-18, for the 2006-7 and 2007-8 award years, the student’s fourth year of eligibility is considered to extend until the student completes his or her degree program to the extent the student has remaining eligibility from a fourth-year award.

Academic Year Progression				
Weeks of Instructional Time and Semester-Hour Credits				
Element Completed	<30 weeks*	≥30 but <60 weeks*	≥60 but <90 weeks*	≥90 but <120 weeks*
<24* credits	AY 1	AY 1	AY 1	AY 1
≥24 but <48* credits	AY 1	AY 2	AY 2	AY 2
≥48 but <72* credits	AY 1	AY 2	AY 3	AY 3
≥72 but <96* credits	AY 1	AY 2	AY 3	AY 4
* Note that if a student meets or exceeds the maximum in one measure but not the other, the student has not progressed to the next academic year until both measures are met or exceeded.				

Case Study 14: Jackie

Institution does an exact accounting except transfer credits (§691.6(a), (b), and (c); Preamble, November 1, 2006 final regulations (71 FR 64404-64405))

- Jackie transfers in 12 semester hours and has received a first-year ACG award for attending a full academic year at the prior institution.
- She attends full-time except for terms 10.
- She declares a major in computer systems analysis (CIP code 11.0501) at the beginning of her fifth term.

Points illustrated

- The institution assumes weeks of instructional time based on credits accepted on transfer. Therefore, upon enrollment Jackie is considered to be in her first academic year for ACG based on the 12 credits accepted on transfer and the attributed 15 weeks of instructional time. In fact, if the institution did an exact accounting of attendance at all institutions, she would be a second-year student and her GPA would be based on the grades of the 12 transferred credits.
- The institution must do an exact accounting of her academic year progression at the institution; the provisions for assuming weeks of instructional time in §691.6(d) and DCL GEN-06-18 do not apply.

Case Study 14: Jackie

Term	Hours (cumulative)	Weeks of i.t. (cumulative)	Grade level	Grants	Notes
Payment period 1	12 (24)	15 (30)	Freshman		Assume 15 wks for transferred credits; no remaining first year eligibility
Payment period 2	12 (36)	15 (45)	Freshman	ACG 2	Declares major
Payment period 3	12 (48)	15 (60)	Sophomore	ACG 2	
Payment period 4	12 (60)	15 (75)	Sophomore	NSG 3	
Payment period 5	12 (72)	15 (90)	Junior	NSG 3	
Payment period 6	12 (84)	15 (105)	Junior	NSG 4	
Payment period 7	12(96)	15 (120)	Junior	NSG 4	
Payment period 8	12 (108)	15 (135)	Senior		
Payment period 9	12 (120)	15 (150)	Senior		
Payment period 10	4 (124)	5 (155)	Senior		