

ACADEMIC AFFAIRS COUNCIL

AGENDA ITEM: 5.E

DATE: June 10, 2015

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SUBJECT: Graduate Full-Time Status

The Board of Regents approved a number of revisions to BOR Policy 2:29 Definition of Credits and Related Institutional Requirements during their April 2015 meeting. The primary issue affecting the policy change revolved around concerns raised with audit findings pertaining to FICA exemption withholdings within the Regental system. As this issue was discussed, graduate deans within the system inquired about the option for further articulating system level requirements related to the credit hours necessary to be classified at full-time status and the distinctions that can be made across Fall, Spring and Summer terms. AAC supported policy language that graduate student course load could be determined by individual campuses and programs.

Following approval by the Board, the system Financial Aid Directors noted a number of concerns when taking this approach which include: 1) adverse impact on financial aid regulations (see Attachment I); 2) full-time status calculations in Colleague; and 2) Clearinghouse reporting. In an effort to assess the DOE’s standing for providing flexibility for programs or institutions clarification was sought from Clare Barger, Senior Institutional Review Specialist with the U.S. Department of Education. Specifically, the DOE representative was asked whether graduate students are required to take the same number of credit hours every semester to be considered full time for financial aid<sup>1</sup>. The following was received in response:

*“Federal regulations (34 CFR 668.2) do not specify a minimum requirement of credit hours per term that a graduate student must take to be considered a full-time graduate student. The regulations only specify a minimum requirement for undergraduate students. Furthermore, the regulations are also silent on the issue of whether a graduate student must take the same number of hours each term to be considered full time. In addition to the regulatory citation, the Federal Student Aid Handbook for 2014-2015 (Volume 1, Chapter 1, Pages 1-14) states the following: ‘Minimum standards for full-time enrollment. A student’s workload may include any combination of courses, work,*

<sup>1</sup> The specific example of requiring 9 credit hours regardless of whether the student was enrolled during the Fall, Spring or Summer semester to be full-time for financial aid was used.

(Continued)

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RECOMMENDED ACTION

Discussion and Recommendation.

*research, or special studies that your school considers sufficient to classify them as full time. This includes, for a term-based program, one repetition of a previously passed course that is not due to the student failing other coursework. The regulations specify a minimum standard for undergraduate students but not for graduate students.’’*

While this information does suggest that full-time status can vary across terms and can occur at the program level if an institution deems that to be necessary, before institutions begin to take advantage of the flexibility afforded in Policy 2:29 AAC should discuss solutions that should be explored to address the Colleague and Clearinghouse reporting issues that will impact financial aid. Additionally, since the primary goal for establishing the full-time status for undergraduates is to encourage student timely completion, the same standard should also be used as institutions seek to explore full-time status variations that work best for their institution. Potential guidelines or review by AAC as changes are proposed should be discussed.