

To: Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee

From: Eric Atchison and Magnus Noble, on behalf of students who are currently enrolled and receiving assistance from the Title IV, HEA programs

Re: Calendar time to complete the requirements of a program of study

Date: January 4, 2026

Recommendation:

We recommend adding clarifying language that the calculation for full-time and less-than-full-time is based on a student's initial term of enrollment. Text additions are in red below.

Amended Language:

§ 668.43(d)(1)(i)(B) - Institutional and programmatic information.

(B) As calculated by the Secretary, the median length of calendar time (i.e., weeks, months, years) taken for full-time and less-than-full-time students to complete the program's academic requirements and obtain the degree or credential awarded by the program. **This calculation shall determine a student to be full-time or less-than-full-time based on a student's initial term of enrollment in the program.**

Rationale:

The Department has noted that they believe that students and consumers should be aware that many students do not finish their programs within the published program length. However, many students adjust their enrollment intensity from term to term to adjust to work and life demands. This proposed change aligns with other federal measures of enrollment intensity within cohorts (e.g., IPEDS Graduation Rate and Outcome Measures).