

## **Questions from Participants of Webinar 2 - Program Integrity Regulations**

Q: Looking at "pace" term: when a student completed 90% of his required hours but student doesn't have completed all the required final grades (student completed only 30% of the final grades instead of 90%) can be eligible for Title IV?

A: No. For a student to receive the second disbursement of financial aid in a non-term program (either clock or credit hours), the student must successfully complete both the clock or the credit hours and the weeks in the payment period. "Successfully complete" is defined as passing the coursework associated with the clock or credit hours. See the FSA Handbook, Volume 3, chapter 1, page 3-7:

### **Successfully Completes"**

34 CFR 668.4(h)(1),(2)

A student "successfully completes" credit or clock-hours if your school considers the student to have passed the coursework associated with those hours.

Q: If a student was in warning and at the second check point is going to probation can be eligible for Title IV?

A: Yes, if probation is the result of granting the student's appeal. If a student on SAP warning fails to meet the SAP standards at the next evaluation point, he or she loses financial aid eligibility. If the school's SAP policy permits appeals, the student must appeal the loss of financial aid eligibility in compliance with the new requirements on appeals. If the school grants the student's SAP appeal and places the student on SAP probation, the student is eligible for Title IV aid during the probation period.

Q: As in the past, will you be able to provide sample SAP policies which meet the new requirements?

A: At its August meeting, the Commission will consider revisions to Document 18 Attachment – Sample Satisfactory Academic Progress Policies, which will be posted to the ACCET website as soon as it is available. In April 2011, the Commission approved a revised Document 18 – Satisfactory Academic Progress Policy to be in compliance with the Program Integrity Regulations.

Q: Do we have to use the new SAP policies and definitions if the schools policy is stricter than the DOE's new policy?

A: If a school's SAP policy uses the terms SAP warning and SAP probation, they must be used with the meanings defined in the new regulations. It does not matter if the school's policy is stricter than DOE's minimum requirements.

Q: Does this apply to currently attending students not using 2011-2012 funds or just to new students?

A: The school's revised SAP policy must specify an effective date and address how crossover students and payment periods will be treated (see page 66880 of the preamble). Crossover payment periods can be assigned to either award year for payment, and for SAP treatment as well. It does not matter which year the aid is paid from for a crossover payment period—it can still be handled under either the existing SAP policy or the revised SAP policy. For example, a school's policy could be effective for all new starts July 1, 2011 and after, for all payment periods that are wholly contained in the 2011-2012 award year, and for all crossover payment periods for which 2011-2012 aid is awarded.

Q: Does this apply only to Title IV students?

A: The federal regulations only apply to Title IV eligible students. ACCET Document 18 applies only to Vocational, Title IV institutions—but would apply to all students attending the institution, including those who are not Title IV eligible.

Q: For computing these on-time grad rate, placement rates, completion rate. Let's say the Medical Assistant program has 2 programs, a MA-day program and MA-night program. How do we calculate these rates? Together or separate?

A: If the programs are different lengths in weeks or months, and are thus reported separately on the institution's ECAR, they would need to be listed as separate programs on the institution's website. The Gainful Employment disclosure requirements, including the on-time graduation rate and placement rate, would need to be disclosed separately.

Q: How does the 10% excused absence regulation track with the ACCET requirement of 80% attendance?

A: ACCET Document 35 does not include a numeric attendance requirement; ACCET does not mandate an 80% cumulative attendance requirement, but that has been widely adopted and accepted by the Commission as a minimum good practice. The 10% excused absences allowable under the new regulations for credit hour programs as well as clock hour programs will require some schools to revise their attendance policies. A school might, for example, require a minimum of 80% cumulative attendance, with a maximum of 10% of the classroom hours that can be made up, to get to the overall 90% attendance rate. ACCET's Model Attendance Policy, included on the ACCET website as "best practice" guidance, includes a 90% cumulative attendance requirement for the classroom portion of the program, and a 100% cumulative attendance requirement for externship part of the program.

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