

Comprehensive Transition and Postsecondary Programs and Title IV Federal Student Aid Eligibility

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Presenter Biography

- *Ian Foss joined the Department as a Program Specialist in Federal Student Aid's Policy Liaison & Implementation Office in 2010. Since then, he has focused on a variety of issues, including statutory and regulatory proposals for student loans, funding for students with intellectual disabilities, and foreign schools. He has also been involved in the implementation of the Public Service Loan Forgiveness Program.*



Agenda

- Student Eligibility
- Program Eligibility
- Comprehensive Transition Program Approval Process
- Related Issues
 - Gainful Employment
 - Demonstrating Financial Need
- Web Resources
- Training Opportunities

Support for Students with Intellectual Disabilities

- Title VII – discretionary grants – Office of Postsecondary Education (OPE)
 - TPSID 84.407A
 - Coordinating Center 84.407B
 - <http://www2.ed.gov/programs/tpsid/index.html>
- Title IV – financial aid – Federal Student Aid (FSA)
 - <http://www.ifap.ed.gov/ifap/index.jsp>



Title IV Programs – Financial Aid

- HEA allows an eligible student with an intellectual disability attending an eligible comprehensive transition and postsecondary (CTP) program to receive aid from the following Title IV programs:
 - Federal Pell Grant,
 - Federal Supplemental Education Opportunity Grant, and
 - Federal Work-Study
- Implementing regulations can be found at 34 C.F.R. 668, Subpart O



Three Eligibility Pieces

Related to How Students get Financial Aid

- ❑ Student Eligibility;
- ❑ Program Eligibility & Approval; and
- ❑ Demonstrating Financial Need (FAFSA).



Student Eligibility: Title IV Waivers

- ❑ Defined in 34 C.F.R. 668.233
- ❑ Must meet all of the general, Title IV student eligibility requirements under Part 668, Subpart B, **EXCEPT** the students:
 - ❑ Are NOT required to be working toward a degree or certificate;
 - ❑ Are NOT required to have a high school diploma, GED, or have passed an ability-to-benefit test; and
 - ❑ Must maintain satisfactory academic progress under school's policy for students in the CTP Program.



Student Eligibility: Intellectual Disabilities & Documentation

- Student must also have an intellectual disability as defined in 34 CFR 668.231(b):
 - Must have a significant cognitive impairment, AND
 - Must be or have been eligible for FAPE under IDEA
- Institution determines if student meets specialized eligibility criteria (above) and must obtain substantiating documentation of both factors.



Student Eligibility: Documenting the Intellectual Disability

- Documentation requirement may be satisfied by:
 - A record from an LEA showing:
 - The student is or was eligible for special education and related services under IDEA; and
 - That the student has an intellectual disability.
 - If record from LEA does not specifically identify the intellectual disability, the institution must obtain additional documentation, such as:
 - A documented, comprehensive, and individualized evaluation and diagnosis of an intellectual disability by a psychologist or other qualified professional; or
 - A record of the disability from a local or State educational agency or government agency that identifies the intellectual disability.





End of Student Eligibility Section

Questions?



Program Eligibility: Regulatory Elements of a CTP Program

- Defined in 34 C.F.R.668.231
- Must:
 - Be offered by an IHE participating in Title IV
 - Be delivered to students physically attending the IHE
 - Be designed to support students with intellectual disabilities (ID) in preparation for gainful employment
 - Include an advising and curriculum structure
 - Require students with ID to interact with non-ID students
 - One-half of participation in academic components
 - Other opportunities for inclusive coursework and activities



Program Eligibility: Generally

- ❑ Must meet the basic program eligibility requirements in 34 CFR 668.8.
- ❑ Must also meet specialized program eligibility requirements in 34 CFR 668.232:
 - Apply to the Department;
 - Meet the definition of a CTP Program;
 - Have a SAP Policy for the CTP Program;
 - Offer a credential (degree or certificate) or have identified outcomes for enrolled students;
 - Notify its accrediting agency in writing that it is offering a CTP Program; and
- Have an established program length in weeks of instructional time and credits/clock hours.





End of Part I of Program Eligibility Section

Questions?



Approval Process: Departmental Approval Required

- ❑ Normally the Department does not review program curricula.
- ❑ However, accrediting agencies do not currently have capacity to approve CTP Programs.
- ❑ Until accrediting agencies can review CTP Programs, the Department will review programs.



Approval Process: General Information

- Described in detail in:
 - IFAP Electronic Announcement 2011-06-06: (General) Title IV Eligibility for an Institution's Comprehensive Transition and Postsecondary Program for Students with Intellectual Disabilities, available at:
 - <http://ifap.ed.gov/eannouncements/060611TitleIVEligInstitComprehensiveTransition.html>
- Requires program representatives and Financial Aid Administrators to work closely.
- Apply for Approval using the *Application for Approval to Participate in the Federal Student Financial Aid Programs* (E-App): www.eligcert.ed.gov.



Program Eligibility: E-App & Supporting Documentation

- Financial Aid Administrator completes E-App with input from program representative
 - Sections A, E, and L
 - (CIP code = 30.9999)
- Program representative provides the following supporting documentation (submitted via e-mail):
 - Detailed narrative description of how the CTP program meets all of the specific program eligibility requirements
 - Satisfactory academic progress policy for CTP students
 - Letter to accrediting agency



Program Eligibility: Review Process

- ❑ Internal review of general program eligibility requirements, including Satisfactory Academic Progress (SAP) Policy
- ❑ External Review of narrative description for clear explanation of how all required elements at met
 - External review by professionals with expertise in CTP – offer recommendations
- ❑ Additional information may be requested
- ❑ May take time
- ❑ Institutions can reapply if they are not initially approved



Program Eligibility: Approval Process & Helpful Hints

- Program Description
 - Use page numbers and institutional name in header.
 - Ensure you address all program requirements identified in the definition at 34 C.F.R.668.231.
 - Clearly identify when each requirement is being addressed by citing to the component of the regulations.
 - Be explicit – provide examples.
 - Include supporting materials.
 - Limited to 30 pages.



Program Eligibility: Approval Process & Helpful Hints

□ E-App

- Verify correct program length is identified.
- Include non-credit classes and internships/work-based training.
- Even if offered in credit hours, must be rooted and reported in clock hours for Title IV purposes because not awarding a degree. See 34 CFR 668.8(k)(1)(i)-(ii).
 - Credit hours reported must be based on conversion formula contained in 34 CFR 668.8(l).
 - Semester hour = 37.5 clock hours;
 - Trimester hour = 37.5 clock hours; and
 - Quarter hour = 25 clock hours
 - Clock-hour defined in 600.2(b).





End of Part II of Program Eligibility Section

Questions?



Related Issues

- Student eligibility starts with the academic term during which the approval is received, even if the term has already started.
 - The eligibility would not apply to terms or payment periods prior to that time.
- No interruption in federal aid for other students when an application to add a CTP program is submitted.



Gainful Employment

- A CTP Program is a program that:
 - “Is designed to support students with intellectual disabilities
 - “Who are seeking to continue academic, career and technical, and independent living instruction
 - “At an institution of higher education
 - “In order to prepare for gainful employment.”



Gainful Employment Continued

- By definition, CTP Programs are Gainful Employment (GE) Programs.
- Therefore, required to comply with all GE requirements the same as all other GE Programs.



Gainful Employment Resources

- GE Questions & Answers are posted on IFAP at: <http://ifap.ed.gov/GainfulEmploymentInfo/2011GEFAQ.html>.
- General GE Information may also be obtained on IFAP at: <http://ifap.ed.gov/GainfulEmploymentInfo/index.html>.
- If you still have questions about GE requirements, please send a message to:
 - GE-Questions@ed.gov.



Demonstrating Financial Need: The Basics

- Apply for Title IV eligibility using the Free Application for Federal Student Aid (FAFSA): www.fafsa.ed.gov/
 - FAFSA collects student and parent financial information, determines financial need.
- Financial Need = Cost of Attendance – Expected Family Contribution – Estimated Financial Assistance.
- For more information, see *The EFC Formula 2011-2012* on IFAP at:
<http://www.ifap.ed.gov/efcformulaguide/attachments/101310EFCFormulaGuide1112.pdf>



Demonstrating Financial Need: Completing the FAFSA

- ❑ Student may complete the FAFSA before program approval has been given.
- ❑ For all questions, students should select the answer that best reflects their situation.
- ❑ Questions 26, 29, 30, and 94 are especially relevant to CTP Program enrollees.
 - ❑ 26 = High School Completion;
 - ❑ 29 = Grade-Level;
 - ❑ 30 = Degree or Certification Program; and
 - ❑ 94 = Number in College.



End of Demonstrating Financial Need Section

Questions?



Web Resources

- ❑ Student Aid on the Web:
<http://studentaid.ed.gov/PORTALSWebApp/students/english/aideligibility.jsp>
- ❑ Details the basic student eligibility requirements.
- ❑ Links to the regulatory requirements for a CTP Program.
- ❑ Links to a list of approved CTP Programs.



Web Resources

□ Student Aid on the Web: Approved CTP Programs

Comprehensive Transition and Postsecondary (CTP) Program

As of October 1, 2011, the following schools' Comprehensive Transition and Postsecondary (CTP) Programs have been approved for Title IV eligibility:

SCHOOL	LOCATION
Clemson University	Clemson, South Carolina
University of South Carolina	Columbia, South Carolina
Taft College	Taft, California
Coastal Carolina University	Conway, South Carolina
The College of New Jersey	Ewing, New Jersey
College of Charleston	Charleston, South Carolina

Last updated/reviewed October 1, 2011



Training Opportunities

- ❑ Session at Annual FSA Conference entitled “Schools Planning to Add a Program or Location”.
- ❑ Located at MGM Grand Conference Center in Las Vegas, NV from November 29 – December 2, 2011.
- ❑ Registration is free; closes November 11.
- ❑ More information at: <http://fsaconferences.ed.gov>.



Questions about your application?

Contact the School Participation Team (SPT) for your state.

Boston (CT, ME, MA, NH, RI, VT): 617-289-0133	Dallas (AR, LA, NM, OK, TX): 214-661-9490
New York (NJ, NY, PR, Virgin Islands): 646-428-3750	Kansas City (IA, KS, KY, MO, NE, TN): 816-268-0410
Philadelphia (DC, DE, MD, PA, VA, WV): 215-656-6442	Denver (CO, MI, MT, ND, SD, UT, WY)
Atlanta (AL, FL, GA, MS, NC, SC): 404-974-9303	San Francisco (AZ, CA, HI, NV, Pacific): 415-486-5677
Chicago (IL, IN, MN, OH, WI): 312-730-1511	Seattle (AK, ID, OR, WA): 206-615-2594



Also available at www.eligcert.ed.gov .



Thank You!

Any final questions?



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