

BREAKOUT SESSION #5

Maintaining Your Institutional Eligibility

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U.S. Department of Education

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WHAT IS INSTITUTIONAL ELIGIBILITY?

WHEN A SCHOOL IS ELIGIBLE, ALL QUALIFYING STUDENTS GET FINANCIAL AID



WHEN A SCHOOL IS NOT ELIGIBLE, QUALIFYING STUDENTS CANNOT GET FINANCIAL AID



MAINTAINING INSTITUTIONAL ELIGIBILITY CONTRIBUTES TO THE SUCCESS OF IT'S STUDENTS



AGENDA

1. Learning the Basics
2. Understanding Eligibility and Certification
3. Updating the Application
4. Applying for Recertification
5. Avoiding Common Pitfalls

LEARNING THE BASICS

The E-App, PPA, and ECAR

LEARNING THE BASICS

Understanding basic terminology and functionality to key eligibility elements are essential to maintaining institutional eligibility.

WHAT IS AN E-APP?



WHAT IS THE DIFFERENCE BETWEEN THE PPA AND ECAR?



WHAT ARE THE APPROVAL AND ACKNOWLEDGEMENT NOTICES?

LEARNING THE BASICS

The Electronic Application (E-App)

- *The Application for Approval to Participate in the Federal Student Financial Aid Programs*
- Located at eligcert.ed.gov
- Used to apply for recertification
- Used to report all types of changes regarding school eligibility, including change of officials, additional locations, and educational program updates

LEARNING THE BASICS

The Program Participation Agreement (PPA)

- It is required for certified/participating schools
- A contract between the school and ED which outlines the requirements that the school is required to follow
- Signed by the school, owners where applicable, and ED
- Effective when signed by ED; void as of the new PPA date
- Kept on file by the school, along with a copy of the most recent Eligibility and Certification Approval Report

(unsigned current version is accessible for viewing/printing at eligcert.ed.gov)

LEARNING THE BASICS

The Eligibility and Certification Approval Report (ECAR)

- A snapshot of the school's participation, programs, location, officials, etc.
- A current copy of the ECAR must be kept on file by the school

(current approved version is accessible for viewing/printing at eligcert.ed.gov)

LEARNING THE BASICS

Approval and Acknowledgement Notices

- Provided in response to updates reported on the E-App
- Treated as an addendum to the most recent PPA
- Kept on file by the school, together with the PPA and the updated ECAR

UNDERSTANDING ELIGIBILITY AND CERTIFICATION



UNDERSTANDING ELIGIBILITY AND CERTIFICATION



STATE AUTHORIZATION

Be legally authorized
by a state as a
postsecondary
school



ACCREDITATION

Be accredited by an
Accrediting Agency
recognized by the
Department of
Education



PROGRAMS

Provide an eligible
program



ADMISSION

Admit as regular
students only
individuals with a high
school diploma or its
recognized equivalent;
or individuals beyond
the age of compulsory
school attendance in
the state where the
school is located

UNDERSTANDING ELIGIBILITY AND CERTIFICATION



COURSES

Provide no more than 50% of its courses by correspondence



ATTENDANCE

Have less than 50% of its regular students attend by correspondence



REGULAR STUDENTS

Have no more than 25% of its regular students be incarcerated



LAW ABIDING

Must not have a bankruptcy, be convicted of a crime involving *Title IV* funds or fraud by school or owner

UNDERSTANDING ELIGIBILITY AND CERTIFICATION

Types of Certification for Participation in HEA Title IV Programs

FULL CERTIFICATION

- Up to 6 years
- Self-certification options

PROVISIONAL CERTIFICATION

- 1 to 3 years
- Conditional provisions

UPDATING THE APPLICATION

Acknowledgements

UPDATING THE APPLICATION

ACKNOWLEDGEMENTS

CHANGES TO SCHOOL DEMOGRAPHICS



UPDATES TO SCHOOL PERSONNEL



NEW OR MODIFIED CONTRACTS

UPDATING THE APPLICATION

ACKNOWLEDGEMENTS

- Change to the name of the school
- Change of address for main or additional location
- Closure of a previously approved location
- Change from/to clock-hours or credit-hours
- Decrease in the level of educational programs
- Change of educational program name, CIP Code, or credential level
- Discontinuation of educational program for 12 months



UPDATING THE APPLICATION

ACKNOWLEDGEMENTS

- Change to reported President
- Change to reported Chief Financial Officer
- Change to reported Financial Aid Director
- New person/entity acquires 25% or greater ownership without a change in control
- Change in members of Board of Directors

UPDATING THE APPLICATION

ACKNOWLEDGEMENTS

- Change of third-party servicer
- New or significantly modified contract with a third-party servicer
- Termination of a contract with a third-party servicer
- Third-party servicer under contract goes out of business or files bankruptcy

UPDATING THE APPLICATION

Approvals



UPDATING THE APPLICATION

APPROVALS

CHANGE IN
ACCREDITING
AGENCY

CHANGE IN
OWNERSHIP OR
STRUCTURE



ADDING A NEW
LOCATION



EXPANDING
EDUCATION
PROGRAM
OFFERINGS

UPDATING THE APPLICATION

APPROVALS: CHANGE IN ACCREDITING AGENCY

- DCL (GEN-22-10) Guidance for Institutions Seeking to Change or Add Accrediting Agencies
- DCL (GEN-22-11) Procedures for Institutions Seeking Approval of a Request to Change or Add Accrediting Agencies
 - Must notify FSA in writing of its intent to change its primary accrediting agency or add a new accrediting agency
 - Must complete notification process and receive ED approval **before** submitting application to new accrediting agency
 - Must submit update on eApp by updating “primary accreditor” indicator **after** new accreditation has been secured

UPDATING THE APPLICATION

APPROVALS: CHANGE IN OWNERSHIP OR STRUCTURE

- Any change at any level in the ownership of the institution must be reported and approved
- If acquiring an institution, or location of an institution, under different ownership, the ownership change of that institution or location must be reported and approved
- You can request a pre-acquisition review in advance of the change
 - Electronic Announcement (GENERAL-22-70) Updated Guidance and Procedures for Changes in Ownership
- To continue eligibility during transition, a “materially complete application” must be received no later than 10 business days after the day the change in ownership occurs

UPDATING THE APPLICATION

APPROVALS: NEW LOCATIONS

- ECAR lists the main location
- ECAR lists approved additional locations
 - Only locations at which 50% or more of a program is offered must appear on the ECAR

UPDATING THE APPLICATION

APPROVALS: NEW LOCATIONS

- If 50% or more of an educational program is offered at a new location, the school must receive both the required state/foreign government approval and the accrediting agency approval, and report the location to ED
- In some cases, the school must receive ED's approval before disbursing *Title IV* funds to enrolled students, and in some cases, approval isn't required for disbursement

UPDATING THE APPLICATION

APPROVALS: NEW LOCATIONS

- School must receive approval before disbursing *Title IV* funds if the school is:
 - Provisionally certified
 - On heightened cash monitoring or reimbursement
 - Acquiring the assets of another school
 - Subject to a loss of eligibility due to cohort default rates, or
 - Required by ED to receive approval before disbursing *Title IV* funds

UPDATING THE APPLICATION

APPROVALS: NEW LOCATIONS

- To streamline the application review process, schools should consult with their School Participation Division if:
 - Location was a facility of another school that has since closed
 - School is providing a teach-out of a closing school at the closing school's location
 - Location is changing affiliation (is currently an approved school, or an approved location of another school)

UPDATING THE APPLICATION

APPROVALS: NEW LOCATIONS

- If not required to wait for approval, the school may disburse *Title IV* funds to enrolled students after submitting the E-App and all required documentation

UPDATING THE APPLICATION

APPROVALS: NEW LOCATIONS

- ED will review applications for all reported locations to:
 - Ensure location meets eligibility requirements
 - Evaluate the school's administrative and financial capability (if location approval is required)
- If approved, school may disburse/continue to disburse funds after receiving approval letter
- If not approved, school is liable for disbursements made

UPDATING THE APPLICATION

NEW LOCATIONS ELIGIBILITY REQUIREMENTS



AGENCY APPROVALS

Location information on accrediting agency and state approval documents matches reported location details



STREET ADDRESS

Address is a physical location where students attend class in-person



SHARED LOCATION

If at the site of a current or former eligible location, relationship reported, and eligibility established



FUNDING PLANS

Need for Direct Loan code and/or Federal School Code for the location has been determined

UPDATING THE APPLICATION

APPROVALS: NEW EDUCATIONAL PROGRAMS

- ECAR lists the eligible credential levels
- ECAR lists the eligible programs approved by ED
 - Only programs that are required to be reported, or those voluntarily reported, will appear on the ECAR



UPDATING THE APPLICATION

APPROVALS: NEW EDUCATIONAL PROGRAMS

- The school must submit an E-App reporting new educational program(s) *and obtain approval* before disbursing funds if the **school** is:
 - Provisionally certified
 - On heightened cash monitoring or reimbursement
 - Required by ED to receive approval before disbursing *Title IV* funds

UPDATING THE APPLICATION

APPROVALS: NEW EDUCATIONAL PROGRAMS

- The school must submit an E-App reporting the new educational program(s) *and obtain approval* before disbursing funds if the **program** is:
 - A short-term program that does not admit as regular students only persons who have completed the equivalent of an associate degree
 - Measured by direct assessment and is the first such program offered at that level
 - A Comprehensive Transition and Postsecondary (CTP) Program for students with intellectual disabilities

UPDATING THE APPLICATION

APPROVALS: NEW EDUCATIONAL PROGRAMS

- The school must submit an E-App reporting the new educational program(s), *but is not required to wait for approval* before disbursing funds if the **program** is:
 - Required to prepare a student for “gainful employment in a recognized occupation” and the school is not otherwise required to receive approval for the program
 - A second or subsequent direct assessment program at a credential level

UPDATING THE APPLICATION

APPROVALS: NEW EDUCATIONAL PROGRAMS

If the school/program does not meet the criteria for required reporting, schools may make a self-determination of eligibility for new educational program(s), and then disburse funds to students without obtaining ED approval

- School must receive state and accrediting agency approvals, and confirm the program meets any other requirements
- Schools may report programs for which they have made a self-determination

UPDATING THE APPLICATION

APPROVALS: NEW EDUCATIONAL PROGRAMS

ED will review applications for all reported educational programs to:

- Ensure reported programs meet eligibility requirements
- Evaluate the school's administrative and financial capability (if program approval is required)
- If approved, these programs will be added to the ECAR as an eligible program and the school may disburse/continue to disburse funds after receiving their approval letter
- If not approved, school is liable for disbursements made

UPDATING THE APPLICATION

NEW EDUCATIONAL PROGRAMS ELIGIBILITY REQUIREMENTS



AGENCY APPROVALS

Program information on accrediting agency and state approval documents matches reported program details



CIP CODE

Classification of Instructional Programs (CIP) Code from 2020 CIP list is consistent with name of program



SOC CODE

Standard Occupational Classification (SOC) Code, from U.S. Bureau of Labor Statistics, associated with CIP code, where required



PROGRAM LENGTH

Meets minimum weeks and clock or credit hours for credential level

UPDATING THE APPLICATION

NEW EDUCATIONAL PROGRAMS ELIGIBILITY REQUIREMENTS



STATE REQUIREMENT

Does not exceed either 150% of the minimum number of clock-hours established by the state for training in the occupation for which the program prepares students; or
The minimum clock hours established by an adjacent state



CLOCK TO CREDIT CONVERSION

If measuring in credit hours, meets requirements to offer program in credit hours, or credit hours are converted from clock hours based on hours of instruction



DIRECT ASSESSMENT

Meets requirements if Direct Assessment Program



CTP PROGRAM

Meets requirements if Comprehensive Transition and Postsecondary (CTP) Program (See DCL GEN-11-01), and uses 2020 CIP Code 30.0001

UPDATING THE APPLICATION

THE PROCESS

- Complete the E-App
- Submit Supporting Documentation
- Receive Response

UPDATING THE APPLICATION

DOCUMENTS TO SUBMIT FOR ACKNOWLEDGEMENTS AND APPROVALS

School must submit to ED:

- Accrediting agency and state/foreign government authorization approvals for changes or additions
- Any documentation required in Section M
- Section L of the E-App containing a manually drawn signature of the appropriate school official
- Documents are submitted via the Document Center on the Common Origination and Disbursement (COD) website

UPDATING THE APPLICATION

ACKNOWLEDGEMENTS AND APPROVALS: FINALIZING THE UPDATE

After your application has been reviewed, you will receive an email directing you to review, and save a copy of:

- the acknowledgement or approval letter
- the updated ECAR

APPLYING FOR RECERTIFICATION



APPLYING FOR RECERTIFICATION

All participating schools must go through a recertification process to maintain eligibility to participate in the *HEA, Title IV* Programs

APPLICATION TIME FRAMES & DEADLINES



PREPARATION BEFORE STARTING THE RECERTIFICATION APPLICATION



COMPLETING THE RECERTIFICATION PROCESS

APPLYING FOR RECERTIFICATION

APPLICATION TIME FRAMES & DEADLINES

- All participating schools must go through recertification
- Recertification is completed prior to the PPA expiration date
- The PPA expiration date is identified at the top of the first page of the PPA as the “Approval Expiration Date”

APPLYING FOR RECERTIFICATION

APPLICATION TIME FRAMES & DEADLINES

- The Recertification E-App should be submitted by the “Reapplication Date”
- The Reapplication Date is located at the top of the first page of the PPA, immediately below the “Approval Expiration Date”
- The Reapplication Date, or E-App due date, is three months before the PPA expiration date

APPLYING FOR RECERTIFICATION

APPLICATION TIME FRAMES & DEADLINES

- If a complete application is submitted before the Reapplication Date, the PPA will automatically be extended month-to-month until the review of your application is completed by an Eligibility Analyst

For more information, see the 2022-23 FSA Handbook, Volume 2 School Eligibility and Operations, Chapter 5 Updating Application Information

APPLYING FOR RECERTIFICATION

PREPARATION BEFORE STARTING THE RECERTIFICATION APPLICATION



OPEID & TIN/EIN

Both numbers are needed in order to log on to the eApp website



STATE AUTHORIZATION

Copy of current state authorization documents (both approval letter and list of approved programs, if applicable)



ACCREDITATION

Copy of current accreditation documents (both approval letter and list of approved programs, if applicable)

APPLYING FOR RECERTIFICATION

PREPARATION BEFORE STARTING THE RECERTIFICATION APPLICATION



CIP CODES

Ensure CIP Codes are up-to-date using the 2020 CIP Codes



POLICIES AND PROCEDURES

Ensure school's policies and procedures are complete and reflect actual practices



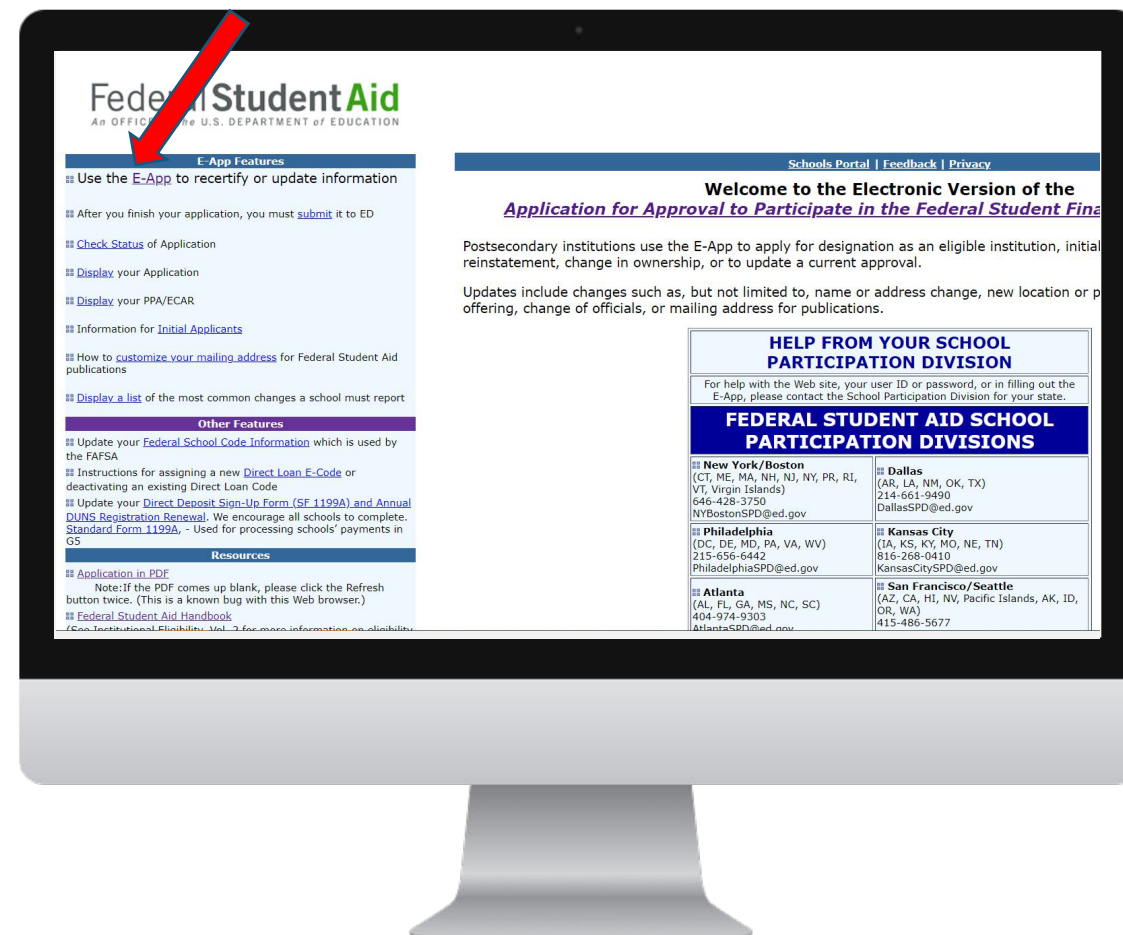
CONSUMER INFORMATION

Ensure all information is available according to the Consumer Information FSA Assessment

APPLYING FOR RECERTIFICATION

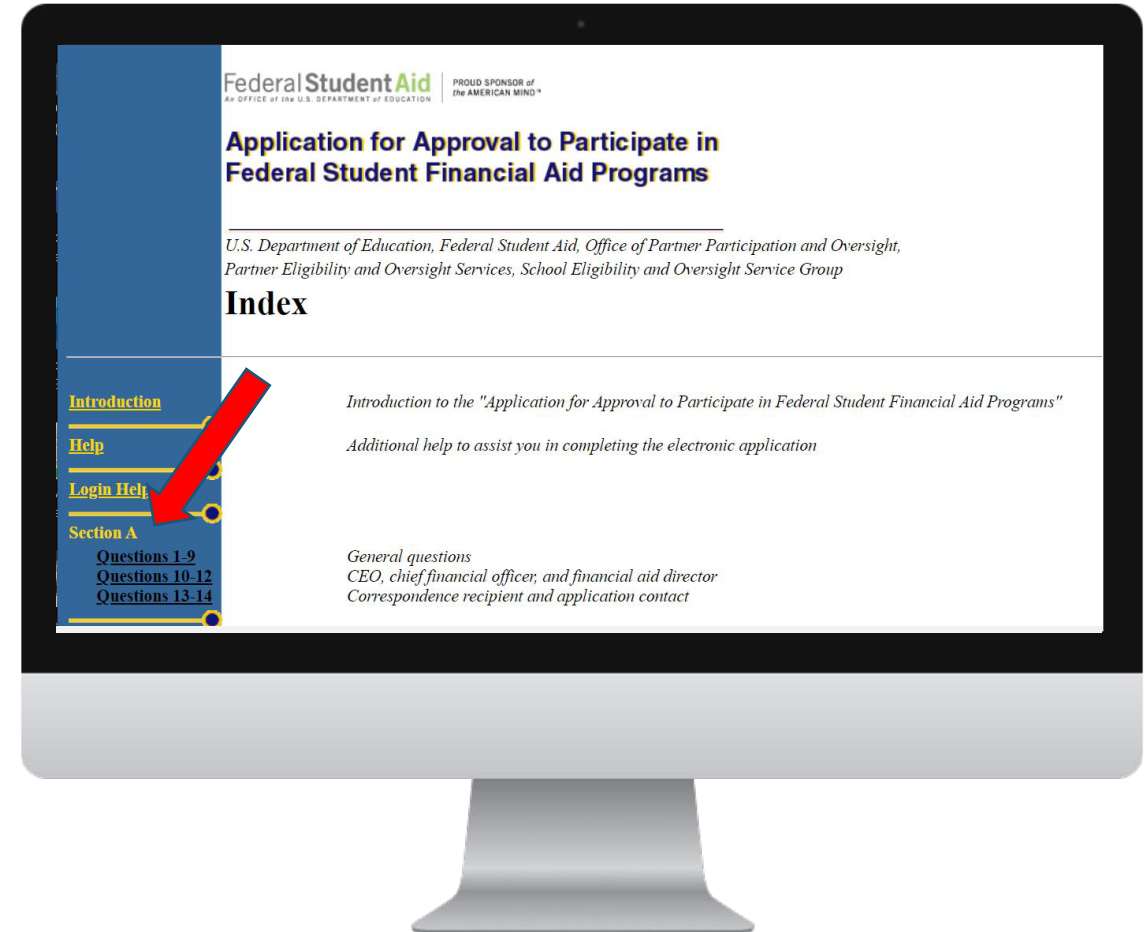
eligcert.ed.gov

On the eligcert.ed.gov website, select the E-App hyperlink to navigate to the E-App.



APPLYING FOR RECERTIFICATION

On the E-App home screen, select the Question numbers hyperlink to navigate to the log in screen.

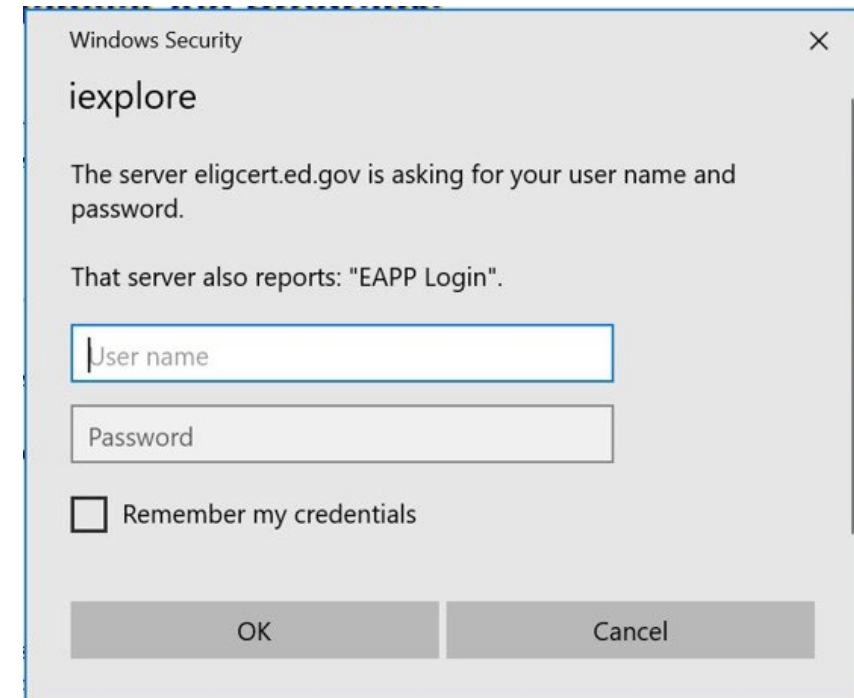


APPLYING FOR RECERTIFICATION

LOG IN PROMPT

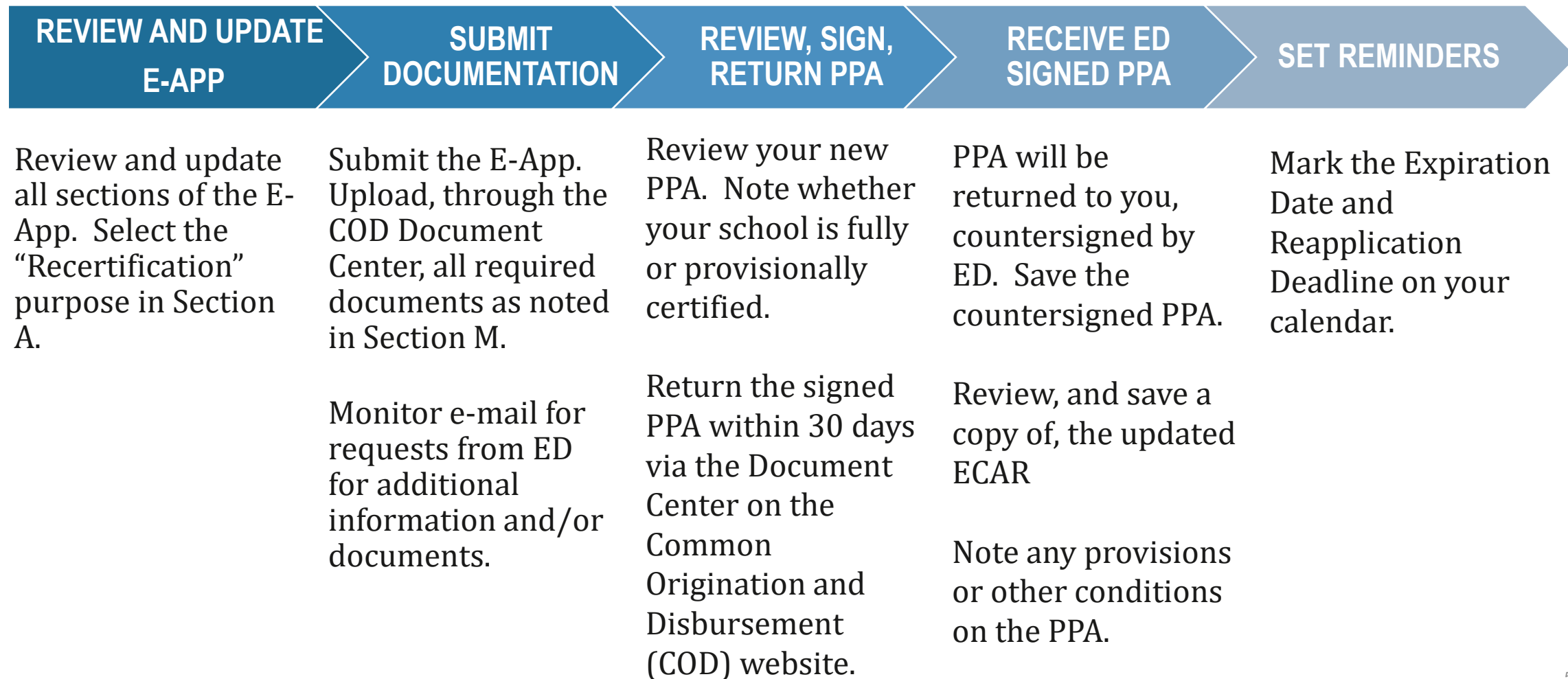
Username and Password are specific to the school and not to the individual user

*Contact your SPD for log in assistance



APPLYING FOR RECERTIFICATION

COMPLETING THE RECERTIFICATION PROCESS



APPLYING FOR RECERTIFICATION

PPA SIGNATURE REQUIREMENT

- President or CEO of institution must sign the PPA
- PPA may include request for signatures of owners that have, or could have, a direct or indirect effect on the institution's financial responsibility
 - Electronic Announcement (GENERAL-22-16) Updated Program Participation Agreement Signature Requirements for Entities Exercising Substantial Control Over Non-Public Institutions of Higher Education
- PPA should be returned with all requested signatures

AVOIDING COMMON PITFALLS



AVOIDING COMMON PITFALLS

Errors and oversights can delay application processing.

**HAVE
CONVERSATIONS
WITH SCHOOL
ADMINISTRATORS**



**REVIEW
APPLICATION
BEFORE
SUBMITTING**



**CONTACT THE
SCHOOL
PARTICIPATION
DIVISION**

AVOIDING COMMON PITFALLS

- Review all sections of the eApp and include all necessary and mandatory updates
- If reporting more than one update on the E-App, check the box for EACH purpose
- If updates are reported on a recertification application, select “Recertification” as the only purpose



AVOIDING COMMON PITFALLS

- Do not type over names of school officials in Section A
 - To replace an official, check the radio button to indicate a change is needed, then enter the name of the new official
- Ensure phone numbers for officials are direct lines and not general campus numbers
- Do not type over names of board members in Section C
 - When changing board members, enter an 'end date' next to each individual leaving, then add new board member names on a new line

AVOIDING COMMON PITFALLS

- Provide Emergency Contact Information for your school in Section K, Question #69
 - Include the words “Emergency Contact”
 - Provide alternate/emergency contact information for your Financial Aid Director reported in Section A, Question 12
 - Provide emergency contact information for another official
 - Contact Information: personal cell phone number and email address

AVOIDING COMMON PITFALLS

- Remember to:
 - Click the “SUBMIT” button
 - Submit the signed signature page
 - Submit state/foreign government and accrediting agency approval letters with a list of approved programs (if applicable)
- When in doubt, ask your School Participation Division

SCHOOL ELIGIBILITY and OVERSIGHT SERVICES GROUP (SEOSG)

Martina Fernandez-Rosario – Director, School Eligibility and Oversight Services Group

415-486-5605

School Eligibility and Oversight Services Group General Number: 202-377-3173 or email: CaseTeams@ed.gov

Or call/email the appropriate School Participation Division team below for information and guidance on audit resolution, financial analysis, program reviews, school and program eligibility/recertification, heightened cash monitoring claim processing, and school closure

New York/Boston School Participation Division

Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, New Jersey, New York, Puerto Rico, Virgin Islands

E-mail Mailbox: NYBostonSPD@ed.gov

Vanessa Dillard, Division Chief 404-974-9418

Jen Uhler – Boston 617-289-0121

Teresa Martinez – New York 646-428-3748

Philadelphia School Participation Division

District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia, Michigan

E-mail Mailbox: PhiladelphiaSPD@ed.gov

Nancy P. Gifford, Division Chief – 215-656-6436

Sherrie Bell - Washington, DC 202-377-3349

Manny Loera – Philadelphia 215-656-8503

Bronsdon Thompson – Philadelphia 202-377-3747

Multi-Regional and Foreign School Participation Division

E-mail Mailbox: Multi-RegionalSPD@ed.gov

FSA.Foreign.Schools.Team@ed.gov

Michael Frola, Division Chief 202-377-3364

Mark Buszkohl – Washington, DC 202-377-4572

Michelle Allred – Dallas 214-661-9466

David Garza – Dallas 214-661-9694

Atlanta School Participation and Financial Analysis Division

Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina

E-mail Mailbox: AtlantaSPD@ed.gov

Christopher Miller, Division Chief 404-974-9297

Vinita Simpson Miller – Atlanta 404-974-9260

Angelique James – Atlanta 404-974-9441

Rhonda Puffer – FA Division - 816-268-0547

Dallas School Participation Division

Arkansas, Louisiana, New Mexico, Oklahoma, Texas

E-mail Mailbox: DallasSPD@ed.gov

Cynthia Thornton, Division Chief 214-661-9457

Jesus Moya – Dallas 214-661-9472

Kim Peeler – Dallas 214-661-9471

Kansas City School Participation and Third-Party Services Division

Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee

E-mail Mailbox: KansascitySPD@ed.gov

FSAPC3rdpartyserviceroversight@ed.gov

Dvak Corwin, Division Chief 816-268-0420

Angie Beam – Kansas City 816-268-0534

Kathy Feith – Kansas City 816-268-0406

Chicago/Denver School Participation Division

Illinois, Minnesota, Ohio, Wisconsin, Indiana, Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

E-mail Mailbox: Chicago.Denver.SPD@ed.gov

Jeremy Early, Division Chief 312-730-1529

Jason Charlton – Chicago 312-730-1695

Tammi Sawyer – Chicago 312-730-1531

San Francisco/Seattle School Participation Division

American Samoa, Arizona, California, Guam, Hawaii, Nevada, Palau, Marshall Islands, North Marianas, State of Micronesia, Alaska, Idaho, Oregon, Washington

E-mail Mailbox: Sanfrancisco.Seattle.SPD@ed.gov

Martina Fernandez-Rosario,

Acting Division Chief **415-486-5605**

Erik Fosker – San Francisco 415-486-5606

Kim Meadows – Washington, DC 202-377-3058

QUESTIONS?

CaseTeams@ed.gov