### BO5. Maintaining Your Institutional Eligibility (Q&A)

**Question:**

If the CEO takes a 2 weeks leave of absence and designated someone else to be acting, do we have to update the e-app?

**Response:**

SME Bowder - No. However, if the acting CEO needs to sign any documents we will ask for a copy of the designation.

**Question:**

If a program does not appear on the recent approved ECCAR, should the school discontinue disbursing TIV funds?

**Response:**

SME Bowder - Not all programs are required to be reported by all schools, so not all programs will show on the ECAR. You should contact your School Participation Division for specific requirements for your school.

**Question:**

When updating one of our branch campuses to the main campus. How do we get a new UEI in sams.gov? Do we need to register a new entity? Currently all branches have the same UEI. Dow we just need to update the address on the currently registered entity in sams or register the campus we want as our main campus and deactivate the old one?

**Response:**

SME Bowder - This is considered a redesignation. You will need to register the additional location with sam.gov to receive a new UEI and report it in Question 69 on the E-App. The UEI will stay with the address, so your main location UEI will change when the redesignation is approved.

**Question:**

Could you review your definition of correspondence again?

**Response:**

SME Bowder - From 34 C.F.R. 600.2: Correspondence course: (1) A course provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructors. Interaction between instructors and students in a correspondence course is limited, is not regular and substantive, and is primarily initiated by the student. (2) If a course is part correspondence and part residential training, the Secretary considers the course to be a correspondence course. (3) A correspondence course is not distance education.

**Question:**

Do you need to wait for a year if you are offering a clock hour program that has never been offered at you school and we still do have the approval?

**Response:**

SME Bowder - Please contact your School Participation Division so they can look at the details of your situation.

**Question:**

Can the recert be completed prior to receiving the notification?

**Response:**

SME Bowder - It is possible to submit a recertification application early. However, a school on provisional certification will not be recertified early.

**Question:**

How long does it take for the recertification to be approved for a foreign institution?

**Response:**

SME Bowder - Processing times vary for eligibility applications. As long as a materially complete application is submitted at least 3 months prior to your PPA expiration date, you will not lose eligibility.

**Question:**

Do we need to update board members? if we are a community college?

**Response:**

SME Bowder - Public institutions are directed in the E-App to skip the board member question.

**Question:**

How far in advance should we begin the recertification process?

**Response:**

SME Bowder - You will be sent a reminder 6 months before your PPA expiration date. You should submit the recertification E-App at least 3 months before your PPA expiration date.

**Question:**

How quickly are approvals to updates made? Our CFO and President are both retiring, but about 30 days apart so separate updates will need to be made to meet the 10 day requirement. Will the first update be approved so that the second one can be submitted?

**Response:**

SME Bowder - You can report the change in advance, so it will be ok to report them at the same time.

**Question:**

For a clock-hour school, if you change the length of a program, but it still doesn't exceed 150% of the program length established by the state, does that need to be reported for acknowledgement or approval? (For instance, going, from 133% to 150%.)

**Response:**

SME Bowder - Yes, please report the change.

**Question:**

RE: Additional location approval requested while on Provisional Certification. Upon receipt of approval, are students eligible for a Pell grant starting only with the payment period in which the approval was received?

**Response:**

SME Bowder - Yes, when approval is required, upon approval of a location students are only eligible starting with the payment period in which the approval was received.

**Question:**

Is FSA considering adding an option for School Presidents/CEO/Chancellors to sign the PPA electronically on the signature page (e.g. a PIN or SSO) versus emailing/mailing a copy?

**Response:**

SME Bowder - FSA is currently exploring electronic signature options for schools.

**Question:**

When on Provisional Certification, does the school have to wait for approval after notifying ED of changes to the number of credit hours in a program? weeks in a program? credential level, example AS to AAS?

**Response:**

SME Bowder - Yes. Some changes actually represent a new program. For example, changing from AS to AAS would be reported as ending one program and adding a new program.

**Question:**

Where do you report a modification to the contract with a third party servicer?

**Response:**

SME Bowder - Modifications to third-party servicer contract can be made on the E-App in the TPS section. Services can be added/removed by end dating a service or adding a new service. Schools can also end date the servicer if the contract will not be renewed. Additional information can also be reported via the comment box in the section.

**Question:**

if you offer dual credit classes at a high school and your institutional accreditor is requesting that you add that high school as as an additional location with them are you required to add that high school as an additional location on your ECAR also?

**Response:**

SME Bowder - The institution must report additional locations at which it offers or will offer 50 percent or more of an educational program if the institution wants to disburse title IV, HEA program funds to students enrolled at those locations.

**Question:**

If we plan to operate in-person at a correctional facility (once Pell is made available to incarcerated students), do we need to add the correctional facility to the PPA and must it be approved before we can start offering Pell?

**Response:**

SME Bowder - Yes, you will need to report the correctional facility on the E-App so it will appear on the ECAR. Please attend session BO1. Understanding Prison Education Programs for Confined or Incarcerated Individuals (Q&A), at 1:40pm EST on Wed Nov 30, 2022, and watch for upcoming Dear Colleague Letters and Electronic Announcements on Prison Education Programs.

**Question:**

Does a change in job title that doesn't reflect a change in ownership need to be reported?

**Response:**

SME Bowder - Job title is not a required reporting item, so if the school's job title changes it is not required to be reported unless the school wants it reflected correctly.

**Question:**

these are all within 10 days? the acknowledgment changes

**Response:**

SME Bowder - Yes, 34 C.F.R. 600.21 requires reporting no later than 10 days after the change occurs.

**Question:**

For initial eligibility for Title IV if a school has a certificate program that meets the requirements that they have been teaching for over 2 years and they recently were approved for an associate degree program will both programs be approved or does the associate degree program need to be caught for 2 years?

**Response:**

SME Bowder - On initial certification, only the program that has been taught for two years will be approved.  When the program that was not approved on initial certification reaches two years, the institution can apply for eligibility for that program.