


Maintaining a School's Title IV Eligibility: Why, When, and How to Change the E-App*



2017 PacFAA Conference
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 2016-17 WASFAA President

(*adapted from a presentation by David Bartnicki, Federal Training Officer, Southeast Region)

Institutional Eligibility

- ▶ Eligibility Requirements
- ▶ Eligibility Documents
- ▶ Maintaining Institutional Eligibility
 - ▶ Complying with new requirements
 - ▶ Recertification
 - ▶ Reporting changes

Eligibility Requirements

- ▶ Legally authorized by a state
- ▶ Accredited
- ▶ Provides eligible program(s)
- ▶ No more than 50% correspondence programs
- ▶ No more than 25% incarcerated students
- ▶ Not in bankruptcy, no fraud or crime related to Title IV

Eligibility Documents

- ▶ **Program Participation Agreement (PPA)**
- ▶ School agrees to:
 - ▶ Comply with all Title IV rules
 - ▶ Request Title IV funds to meet immediate needs
 - ▶ Not charge students a fee for financial aid application processing
 - ▶ Maintain adequate administrative and fiscal procedures (which are listed)

PPA

FEDERAL STUDENT AID - START HERE GO FURTHER™
 UNITED STATES DEPARTMENT OF EDUCATION
 FEDERAL STUDENT AID
 SCHOOL ELIGIBILITY CHANNEL
PROGRAM PARTICIPATION AGREEMENT
 Effective Date of Approval: The date on which this Agreement is signed on behalf of the Secretary of Education
 Approval Expiration Date: **September 30, 2022**
 Reapplication Date: **June 30, 2022**
 Name of Institution: **Portland State University**
 Address of Institution: **1721 South West Broadway
 Cramer Hall Room 341
 Portland, OR 97201-0000**

Eligibility Documents

- ▶ **Eligibility and Certification Approval Report (ECAR)**
- ▶ Shows school's federally approved:
 - ▶ Educational program levels
 - ▶ Federal financial aid programs
 - ▶ Accreditation details
 - ▶ State authorization

Eligibility Documents

- ▶ Eligibility and Certification Approval Report (ECAR) - continued
- ▶ Shows school's federally approved:
 - ▶ Officials
 - ▶ Locations
 - ▶ Certificate programs
 - ▶ Third-Party Servicers

ECAR

START HERE
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FEDERAL STUDENT AID

UNITED STATES DEPARTMENT OF EDUCATION
SCHOOL PARTICIPATION MANAGEMENT DIVISION
ELIGIBILITY AND CERTIFICATION APPROVAL REPORT PAGE A-1

DATE PROVIDED: 8/15/2017

NAME AND ADDRESS OF INSTITUTION: Purdue State University
1721 South West Rowlesway
Cramer Hall Room 301
Portland, OR 97205-6000

TYPE OF INSTITUTION: Public

CONGRESSIONAL DISTRICT: 01 ACTION DATE: 1/15/2016
DEPARTMENT REGION: 10 ACTION: Response HighFall Cert
SCHOOL PARTICIPATION TEAM: 10

Maintaining Eligibility

- ▶ The Electronic Application for Approval to Participate in the Federal Student Aid Programs (E-App)
- ▶ The online application schools use to report changes that affect institutional and program eligibility

E-App

CFE ID: 00220400	School Name: Portland State University
Your Nondegree/Vocational Program application has NOT been submitted.	1721 South West Broadway Portland, OR

Electronic Application

Section A. Please answer these general questions.

1. Tell us why you are submitting the application.
 - Nondegree/Vocational Program
 - Third Party Service
 - Add TEACET Grant Program
 - Comprehensive Transition and Postsecondary Program
2. What is the name of your institution?
 - Portland State University
- 3a. Do you have another name such as trade name or d/b/a name under which you legally do business as a postsecondary educational institution?
- 3b. During the past four years, have you had another name that you have not previously reported to the Department of Education?

E-App Features

- ▶ Pre-populated questions
- ▶ Help text
- ▶ Edit checks
- ▶ Status messages
- ▶ Status check

Maintaining Eligibility

- ▶ Complying with new requirements
 - ▶ Stay informed by reading Electronic Announcements (EAs) and Dear Colleague Letters (DCLs)
 - ▶ Attend federal updates and other training events

Maintaining Eligibility

► Recertification

- PPA's expire after six years
- Schools must update the E-App by the Reapplication Date, 90 days before the Approval Expiration Date, to receive continued month-to-month Title IV eligibility if ED's review goes beyond the Approval Expiration Date

Maintaining Eligibility

► Reporting changes

- Many changes require ED approval before funds can be disbursed
- Other changes do not require ED approval before disbursement, but must be reported
- All changes must be reported within 10 days of making the change

Maintaining Eligibility

► Changes that require ED approval

- Accrediting agency
- State authorizing agency
- Institutional structure
- Increase in educational program level
- Addition of non-degree programs (in most cases)

Maintaining Eligibility

- ▶ Changes that require ED approval (continued)
 - ▶ Addition of short-term (<600 clock hours) programs
 - ▶ Changes to approved FSA programs
 - ▶ Change in ownership/type of ownership
 - ▶ Additional locations (in some cases)

Maintaining Eligibility

- ▶ Changes that do not require ED approval
 - ▶ School name
 - ▶ School leadership (e.g., President, Chief Fiscal Officer, Chancellor)
 - ▶ Financial Aid Administrator
 - ▶ Governance of a public institution
 - ▶ Decrease in level of educational programs

Maintaining Eligibility

- ▶ Changes that do not require ED approval (continued)
 - ▶ Clock hours to credit hours
 - ▶ Other location's name or address
 - ▶ Branch campus/additional location closure
 - ▶ Third-party servicers

Adding Educational Programs

- ▶ ED approval required unless:
 - ▶ Program leads to an associate, bachelor's, professional, or graduate degree and school is already approved at that level - or -
 - ▶ Fully certified school adds an undergraduate or graduate program of at least 10 weeks and 8 semester/12 quarter hours - or -

Adding Educational Programs

- ▶ ED approval required unless:
 - ▶ Fully certified school adds an undergraduate program of at least 15 weeks and 16 semester/24 quarter/600 clock hours - and -
 - ▶ Program prepares students for gainful employment *in the same or a similar field as a program ED already approved at the school*

Adding Educational Programs

- ▶ ED reviews *all* reported educational programs
 - ▶ Evaluates school administrative and financial capability (if ED approval required)
 - ▶ Revised ECAR and Approval Letter will be issued
 - ▶ School may disburse funds after receiving approval.
 - ▶ Denial Letter is issued if educational program not approved; school may request reconsideration

Adding Educational Programs

- ▶ ED ensures that educational program meets eligibility requirements.
 - ▶ Accreditor and state approval matches E-App (program names and lengths)
 - ▶ CIP Codes consistent with program names
 - ▶ Leads to a recognized occupation (SOC Code) where required
 - ▶ Meets minimum weeks and clock/credit hour requirements, clock to credit hour conversion where required

Adding Educational Programs

- ▶ ED ensures that educational program meets eligibility requirements (continued)
 - ▶ If applicable, educational program meets special requirements of:
 - ▶ Direct Assessment Programs (DCL-GEN-13-10)
 - ▶ Comprehensive Transition and Postsecondary (CTP) Programs (DCL GEN 11-01)

Adding Educational Programs

- ▶ ED ensures that educational program meets eligibility requirements (continued)
 - ▶ *Schools are liable for funds disbursed if their self-determine of program eligibility is found to have been incorrect*

Submitting Changes

- ▶ Access the E-App at eligcert.ed.gov
 - ▶ Username: ED + 8-digit OPE ID Number
 - ▶ Password: ED + 9-digit Taxpayer ID Number
- ▶ Section A, Question 1 - Select 'Update Information' box
- ▶ Select specific updates from the pick list; use 'Other' if needed and enter purpose in the space provided

Submitting Changes

- ▶ Complete information for the appropriate questions and for Section L
 - ▶ Skip logic takes you to appropriate sections based on application purpose selected
 - ▶ Use Section K, Question 69 to provide additional information
- ▶ Mail signature page (Section L) and required supporting documents listed in Section M to address indicated

Submitting Changes

- ▶ ED will email institution to let them know to go to the PPA/ECAR at eligcert.ed.gov to view the Approval/Acknowledgement Letter, and how to ask questions about the action
- ▶ School should print and review the Approval/Acknowledgement Letter and ECAR

Submitting Changes

- ▶ Common mistakes to avoid:
 - ▶ Not clicking 'Submit' (screen prompts help)
 - ▶ Not mailing the signature page
 - ▶ Not sending state approval and accreditation documentation
 - ▶ Not checking boxes for *each* update purpose

Resources

- ▶ ifap.ed.gov
 - ▶ 34 CFR 600.2; 600.10, 600.20, 600.21
 - ▶ 34 CFR 668.8; 668.10, 668.14, 668.230-233
 - ▶ Relevant DCLs and EAs
- ▶ Federal Student Aid Handbook - Volume 2; Chapter 5
- ▶ eligcert.ed.gov

Questions and Comments

- ▶ What would you like more information about?
- ▶ Do you have any E-App stories to relate or updating tips to provide?
- ▶ Have a great **PacFAA** conference!