

### Federal Pell Grant

**A Guide to Year-Round Federal Pell Grants**

Bruce Honer | Spring 2018  
U.S. Department of Education  
2018 Annual PacFAA Conference

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**Agenda**

- Year-round Pell overview
  - Legislative background
  - General requirements
- Unchanged Pell rules
- Changed Pell rules
- Policy examples
- Operational aspects of year-round Pell



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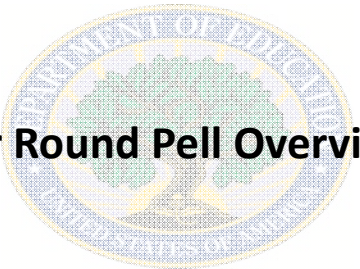
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**Year Round Pell Overview**



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### Federal Pell Grant

**Legislative Background**

- The Consolidated Appropriations Act of 2017 allows a student to receive Pell Grant funds up to 150% of the student's Scheduled Award for an award year
  - 1<sup>st</sup> 100% is initial scheduled Pell award
  - Final 50% is considered the additional Pell award (YRP)
- Effective beginning with the 2017-18 award year
  - Applies to the summer of 2017 ONLY IF treated as a header to 2017-2018

DCL GEN-17-06 issued June 19, 2017

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**General Requirements**

- Student must be otherwise eligible to receive Pell Grant funds for the payment period
- Student must be enrolled *at least half-time* in the payment period(s) for which the student receives the additional Pell Grant funds
- Additional Pell Grant will be included in the student's 600% maximum Pell Lifetime Eligibility Used (LEU)

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**General Requirements**

- Payment period may include awards from both the initial Pell Grant Scheduled Award and from the additional Pell Grant award
- When the calculated award for a payment period is greater than the remaining balance of an initial Scheduled Award, the award for the payment period is the remaining balance plus an amount from the additional Pell Grant award

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### Federal Pell Grant

**Differences from Two Pell Grants in an Award Year**

- NO acceleration requirement
- NO requirement to place a crossover payment period in the award year that produces the largest Pell Grant award

**THE DIFFERENCE**

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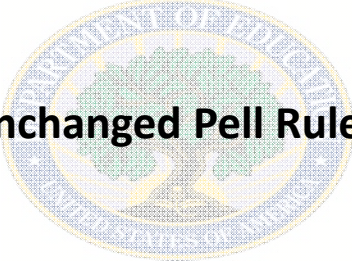
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**Unchanged Pell Rules**



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**Definition of an Academic Year**

- Must be defined for each eligible program
  - May be the same for all programs
  - May be different for some or all programs
- Credit-hour and clock-hour programs will have different academic years
  - For a credit-hour program, must contain a minimum of 24 semester or trimester or 36 quarter credit-hours and 30 weeks of instructional time
  - For a clock-hour program, must contain a minimum of 900 clock-hours and 26 weeks of instructional time

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### Federal Pell Grant

**Definition of a Scheduled Award**

- Amount that a full-time student would receive for a full academic year based on the student's EFC and COA



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**Award Amount**

- No change in the way an award for a payment period is calculated
- Pell Grant formulas have not changed (34 CFR 690.63)
  - Five Pell formulas
  - Use the formula that corresponds to the structure of the program
- Award is calculated by payment period based on a student's Scheduled Award

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**Payment Period Determination**

- Defined in 34 CFR 668.4
- For term-based programs, payment period is the term
- For nonterm programs and all clock-hour programs, payment period is half of the hours and half of the weeks in an academic year
  - Same rules also still apply for determining payment periods for remaining portions of a program



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### Federal Pell Grant

**Pell Crossover Payment Periods**

- Payment period that includes both June 30 and July 1 overlapping two award years
- Must consider the crossover payment period to occur entirely within one award year
- Must have a valid SAR/ISIR for the selected award year
- May be different than the award year used for other Title IV aid (i.e., loans, campus-based)
- Institutions have the flexibility to assign crossover payment periods to either of the relevant award years

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**Pell Crossover Payment Periods**

- Choice of crossover payment period award year can be made based on an institutional policy that—
  - Provides for an individual decision for each student
  - Applies to all students (or a category of students) without exception or
  - Applies to all students (or a category of students) with allowance for an individual student exception

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**Recalculation Policies--Required**

- Must recalculate a student’s Pell Grant award if he does not begin attendance in enough classes to support his enrollment status used to calculate his Pell Grant
- *To be eligible for the additional Pell Grant, a student must be enrolled at least half-time and begin the classes that support that enrollment status*

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### Federal Pell Grant

**Recalculation Policies—Optional**

- Institutions may develop a policy to recalculate for changes in enrollment status during a payment period
- May set a date after which no recalculation will be performed for changes in enrollment status
- If an institution does not establish a policy for recalculating for changes in enrollment status, a student's Pell Grant award is based on the initial calculation even if the student later changes her enrollment status

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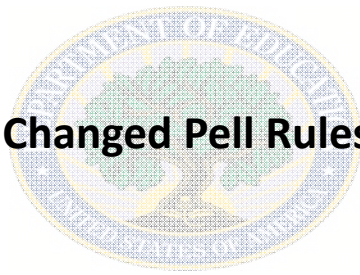
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**Changed Pell Rules**

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**Changed Pell Rules**

- Scheduled Award limitation
- Enrollment status



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### Federal Pell Grant

**Scheduled Award Limitation**

- Old: Student may receive only one Scheduled Award for an award year
- New: Student may receive up to one and one-half of a Scheduled Award for an award year



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**Enrollment Status**

- Old: Less-than-half-time enrollment eligible at all times
- New: Must be enrolled at least half-time to receive the additional award
- Final 50%



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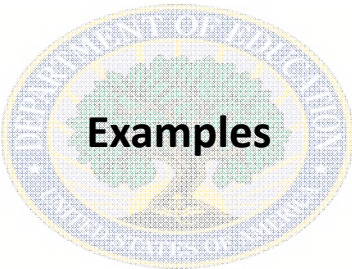
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**Examples**



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### Federal Pell Grant

**Additional Pell – Standard Term**

Additional Pell: Example 1 (Semesters)

The student has used 100% of the original Scheduled Award. A Pell eligible student can be enrolled in any enrollment status to receive any portion of the Scheduled Award

Before the student can receive any portion of the Additional Pell (up to 50%), the student must use up the Scheduled Award and be enrolled at least HT

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**Additional Pell - Clock Hour**

Clock Hour Program: 1215 Clock Hours / 41 Weeks

Student used 100% of Initial Scheduled Award for their first defined AY of 900 hours / 30 wks.

Final Payment Period within 2017-18 Award Year. Student is Eligible for Additional Pell

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**One Term—Additional Pell Amount**

- When the calculated award for a payment period is greater than the remaining balance of the initial Scheduled Award, the award for the payment period is the remaining amount of the initial Scheduled Award plus the Additional Pell amount
  - Awarded as one amount
  - Reported to COD as one amount

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### Federal Pell Grant

**Semester Example**

- Assume student's 2017-18 Scheduled Award is \$5,370 based on an EFC of 550 and a COA of \$10,590

<p>Summer 2017 (assigned to the 2017-18 AY) Three-Quarter-Time</p> <p>Award - \$2,014 which is 37.5046% of the Scheduled Award</p>	<p>Fall 2017 Full-Time</p> <p>Award - \$2,685 which is 50.0000% of the Scheduled Award</p> <p>Total Percent of Initial Scheduled Award is 87.5046%</p>	<p>Spring 2018 Full-Time</p> <p>Award - \$2,685 which is 50.0000% of the Scheduled Award**</p> <p>(Must be half-time to receive any additional Pell amount)</p>
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**Semester Example**

\*\*The additional Pell Grant award cannot exceed 50% of a student's Pell Grant Scheduled Award.

- In the previous example, the Spring 2018 Pell award is made up of 12.4954% (\$671) remaining from the initial Pell Grant Scheduled Award and 37.5046% (\$2,014) from the additional Pell Grant award
- The student has 12.4954% (\$671) remaining from the additional Pell Grant award for the 2017-18 award year
- If the student had used up 100% of his Pell Grant Scheduled Award for Summer 2017 and Fall 2017, the entire Spring 2018 award amount would be from the additional Pell Grant award

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**Additional Pell – Standard Term**

Additional Pell: Example 2 (Semesters)

Enrolled FT  
Fall Term  
50% Used

Enrolled FT  
Spring Term  
50% Used

Enrolled LTHT  
Summer Term  
12.5% Ineligible

Since the student has used up 100% of the scheduled award prior to enrolling in the Summer term. Since the student is not enrolled at least HT, s/he is not eligible for Additional Pell.

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### Federal Pell Grant

#### Additional Pell – Standard Term

Additional Pell: Example 2 (Semesters)

Enrolled LHHT  
Fall Term  
12.5% Used

Enrolled FT  
Spring Term  
50% Used

Enrolled FT  
Summer Term  
50% Eligible

The student is enrolled LHHT in the Fall Term. Since this is not the Payment Period in which the student is receiving Additional Pell, it does not make the student ineligible for Additional Pell in the Summer Term.

Initial Scheduled Award = 37.5%  
Additional Pell = 12.5%

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#### Additional Pell – Transfer Students

Student Transfer to New School on 1/8/2018

2017-18 Pell TEU  
Prior to Transfer =  
90%

Enrolled FT  
Spring Term  
50% Eligible

Student completed Certificate Program at School A prior to transferring to School B. Student used 90% of Initial Scheduled Award

Initial Scheduled Award = 10%  
Additional Pell = 40%

Eligible Pell amount now based out of 150%

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#### Additional Pell – Transfer Students

Student Transfer to New School on 1/8/2018

2017-18 Pell TEU  
Prior to Transfer =  
90%

Enrolled LHHT  
Spring Term  
12.5% Calculated

Student completed Certificate Program at School A prior to transferring to School B. Student used 90% of Initial Scheduled Award

Eligible for Initial Scheduled Award = 10%  
**Ineligible for Additional Pell = 2.5%**

Student is Eligible for Remaining Initial Scheduled Award, but Ineligible for Additional Pell since LHHT

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### Federal Pell Grant

<b>Pell Cross Over Payment Periods</b>			
<i>Paid as Header from Initial Scheduled Award</i>		<i>Pay as Trailer from Initial Scheduled Award or Header for 2018-19</i>	
<b>Summer 2017</b> Less-Than-Half-Time 12.5046% \$671.50	<b>Fall 2017</b> Full-Time 50.0000% \$2,685	<b>Spring 2018</b> Full-Time 50.0000% \$2,685	<b>Summer 2018</b> Half-Time 25.0000% \$1,342.50
2017-18			2018-19

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<b>Optional Recalculation Examples</b>
<ul style="list-style-type: none"> <li>• Conditions               <ul style="list-style-type: none"> <li>• Student is only eligible for the additional Pell Grant award</li> <li>• Student enrolls in two 3 credit-hour courses prior to add/drop date for the term</li> <li>• Institution's policy is to recalculate a student's Pell award up to the add/drop date for the term</li> </ul> </li> </ul>

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<b>Optional Recalculation Examples</b>
<ul style="list-style-type: none"> <li>• <u>Results A</u> <ul style="list-style-type: none"> <li>• Student begins attendance in ALL classes</li> <li>• After add/drop date, student drops one 3 credit-hour course</li> <li>• Student is still considered half-time and eligible for the additional Pell Grant disbursed</li> </ul> </li> </ul>

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### Federal Pell Grant

**Optional Recalculation Examples**

- **Results B**
  - Student begins attendance in all classes
  - Prior to add/drop date, student drops one 3 credit-hour course
  - Student is considered less-than-half-time and is not eligible for the additional Pell Grant

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**Optional Recalculation Examples**

- **Results C**
  - Student begins attendance in all classes
  - After add/drop date, student drops one 3 credit-hour course
  - The initial calculation of the student's Pell Grant occurs subsequent to the "add/drop" date of the term. The institution must use the student's enrollment status on the date of the initial calculation, which is less-than-half-time, and the student is not eligible for the additional Pell Grant.

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**Required Recalculation Module Example**

- Standard term, semester-hour program with a summer term comprised of two modules
- Student is enrolled half-time during summer 2018
  - 100% of 2017-18 initial Scheduled Award has been paid for fall/spring
  - Payment for the payment period will be from additional 2017-18 Pell

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### Federal Pell Grant

**Required Recalculation Example**

- Student was paid half-time Pell award based on enrollment in 6 credits as of the Pell Recalculation Date (PRD)
- Pell recalculation/COD adjustment necessary
  - Withdrawal from 3 credits in summer 2 was after the PRD but the student will *not have begun attendance in all credits* on which the Pell payment was based
  - A similar situation would exist if the student did not withdraw from the 3 credits in summer 2 but simply failed to begin attendance in them
- Student is now less-than-half-time and may not receive payment from 2017-18 additional Pell
  - Payment may be made from the initial 2018-19 Scheduled Award

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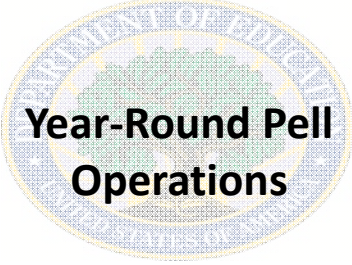
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**Year-Round Pell Operations**

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**Year-round Pell Grants-Operations**

**Resources**

- [June 20, 2017 EA](#) -- provides preliminary COD System implementation information and school processing timeline
- [Updated 17-18 COD Technical Reference –posted 8/30/17](#)
- [October 4, 2017 EA](#) – The COD 16.2 Implementation documentation
- For more technical information on Year-round Pell consider reviewing 2017 FSA Training Conference Session #14 – *COD Update*

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### Federal Pell Grant

**Year-round Pell Grants-Operations**

- **Additional Eligibility Indicator (AEI)**
  - Schools may submit the AEI, an optional tag, that will indicate eligibility for up to 150% Scheduled Federal Pell Grant (SFPG)
  - If a school submits an AEI = "true", the total awarded Pell should equal an amount > 100% of the student's SFPG for that award year across schools
  - FSA will be monitoring schools that submit the AEI="true" for students **not awarded or disbursed** Pell over the 100% SFPG
    - Any school suspected of such practices will be referred to Program Compliance for review and sanctioning if not corrected

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**Year-round Pell Grants-Operations**

**Total Eligibility Used (TEU) Calculation**

- The TEU is the amount of Pell across all schools in one AY
- COD edits against the TEU, with additional student-specific qualifiers, based on circumstances
  - The AEI is one of those qualifiers
- If the AEI is not submitted by any school, or is = "false" by all schools in the AY, and actual disbursement amount > \$0
 

**TEU Max = 100% + |Net of Closed School Adjustments for AY|**
- If the AEI is = "true" by at least one school in the AY, and actual disbursement amount > \$0
 

**TEU Max = 150% + |Net of Closed School Adjustments for AY|**

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**Year-round Pell Grants-Operations**

**COD Origination & Disbursement Edits**

- Year-round Pell edit logic for 2017-18 Award Year and forward when the AEI = "true" for the following:
  - Disbursement Warning Edit **65**
  - Disbursement Warning Edit **68**
  - Award Level Rejecting/Correcting Edit **172**
  - Award Level Rejecting/Correcting Edit **173**
  - Award Level Warning Edit **174**
  - Award Level Warning Edit **175**

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### Federal Pell Grant

**Year-round Pell Grants-Operations**

**COD Reporting tools with the AEI**

- Pell Grant Multiple Reporting Record (MRR) (*position 449*)
- Pell Grant Reconciliation Report Record (*position 97*)
- Pell Grant Year-to-date Record (*position 251*)
- Pell POP Report (*column V in new CSV format*)

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**Year-round Pell Grants-Operations**

**Myths about COD system editing**

- *It will always keep me from awarding/disbursing the wrong amount of Pell*
- *It knows the student . . .*
  - Didn't enroll
  - Has a SAP problem
  - Graduated
  - Completed verification
- *Should be paid off a different CPS transaction number because it is higher than the one originally submitted to COD*
- *Should not be paid off a different CPS transaction number just because it is higher than the one originally submitted to COD*

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**Example #1- AEI Change**

**School**

- Term-based Formula 1, Pell 'correcting' option
- 17-18 COA \$36,435

**Student**

- Full-time senior
- 17-18 EFC = 310
- 17-18 SFPG = 5570
- Packaged in June 2017 for 150% Pell
  - $5570 \times 1.5 = \$8,355$  (150% of 5570)
- *AEI submitted to COD as "true" on 10/17/17*

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### Federal Pell Grant

#### Example #1- AEI Change

Registers for only 3 hrs. (< HT)

Summer: 12 hrs. (FT)  
Fall Semester: 18 hrs. (FT)  
Spring Semester: Pell Recalculation done for < HT

Summer Disb. = \$ 2,785.00 (50%)  
Fall Disb. = \$ 2,785.00 (50%)  
Spring Disb. = \$ 696.50 (12.5044%)  
TEU = 112.5044%

During Internal audit on 7/15/18, AEI is changed from "true" to "false" because student is not at least HT in Spring. No other changes are submitted to COD except AEI change.

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#### Example #1-Late AEI Change

##### Consequences of late AEI change

- COD Response returns
  - Correcting edit 173 (corrects award amount down to SFPG - 5570)
  - Warning edit 174 (award amount < disbursed amount)
- Negative pending 30 day counter begins
- On 8/16/18 Spring disbursement is systematically reduced by COD to \$0 and Current Funding Level (CFL) is reduced by \$696.50
- *This is a school liability, not a student liability*

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#### Example #1-Late AEI Change

##### To Avoid Consequences of late AEI change

- Update procedures when recalculating disbursements
  - Also reevaluate the award amount, and AEI at that time.
  - When AEI is changed from "true" to "false", also reevaluate and submit award and disbursement changes to COD
- Review edits returned in COD record responses to more quickly identify problems
- Run a Pell Reconciliation Report regularly
  - AEI
  - Year-to-date Disbursements accepted
  - Can be downloaded for school data comparison

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Federal Pell Grant

**Example #2- POP with AEI**

<p><b>School A</b></p> <ul style="list-style-type: none"> <li>• Term-based, Formula 1</li> <li>• Trans. 01, EFC= 0</li> <li>• 17-18 COA \$12,500</li> <li>• SFPG = 5920</li> <li>• Eligibility Used =110%</li> <li>• AEI= "true"</li> </ul>	<p><b>School B</b></p> <ul style="list-style-type: none"> <li>• Term-based, Formula 1</li> <li>• Trans. 03, EFC= 433</li> <li>• 17-18 COA \$19,920</li> <li>• SFPG = 5470</li> <li>• Eligibility Used =40%</li> <li>• AEI not submitted</li> </ul>
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**TEU = 150%**

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**Example #2- POP with AEI**

**School A**  
 Summer | Fall Quarter | Winter Quarter  
 Withdraws 1/2/18

**School B**  
 Fall Semester Non-Attendance | Spring Semester  
 Begins Attendance 1/4/18

**School A**  
 COD shows 110% of Scheduled Award used, \$6512 disbursed.

**School B**  
 Disburses (\$5,470 X .40 = )\$2,188 remaining

**School A --R2T4 calculation on 1/10/18. Reduces Winter Pell Award and Disb so EU = 95.475%. Submits updates to COD including changing AEI from "true" to "false" because School A disbursements no longer cause TEU to exceed 100%. TEU is now 135.475%.**

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**Example #2-POP with AEI**

**Consequences - changing AEI to "false"**

- COD Response returns
  - Warning edit 68 returned (POP)
  - Multiple Reporting Record (MRR) sent to both school A & B
  - Pell POP Report is sent to both school A & B
- Negative pending 30 day counter begins
- POP Deobligation -- On 2/11/18 *all disbursements* at both schools are reduced to \$0
  - School A CFL is reduced by \$ 5,652.12
  - School B CFL is reduced by \$ 2,188.00

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**YRP- Example #2-Late AEI Change**

**Avoid Consequences of AEI change and POP**

- Update procedures for R2T4 calculations
  - When AEI is changed from “true” to “false”, always recalculate and submit award *and* disbursement changes if necessary, not just AEI change
- 2<sup>nd</sup> school disbursing any part of the 100-150% (reliant on an AEI= “true”), also submit AEI = “true”
- Always review edits returned in COD responses to more quickly identify problems
- Always review reports to identify and rectify problems

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**Setting the AEI to “true”**

**When should I set the AEI = “true” in COD?**

- When I award Pell for the award year?
- When the student indicates intent for “added” attendance?
  - Crossover period attendance
- Is the program a “year-round” program?
- Transfers
  - Does my school's disbursement represent an amount between 100%-150% in the student's TEU for that award year?

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**Setting the AEI to “false”**

**When should I set the AEI = “false” in COD?**

- Why was it set to “true” previously?
  - Do those conditions still exist?
- Withdrawals/R2T4
- Nonattendance
  - Do you have a procedure when students that fail to enroll as planned?
- **Sooner is always better**
  - Don't wait until you are reconciling Pell for the award year

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**Department of Education Contacts**

Research and Customer Care Center  
800.433.7327  
fsa.customer.support@ed.gov



Reach FSA  
855.FSA.4FAA -- 1 number to reach 10 contact centers!

eZ-Audit	Campus Based Call Center
COD	School Eligibility Service Group
CPS/SAIG	Foreign Schools Participation Division
NSLDS	Research and Customer Care Center
G5	Netnet Total & Permanent Disability Team

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**Contact Information**

Contact me with follow-up questions about this session:

Bruce Honer, FSA Trainer  
bruce.honer@ed.gov | (415) 486-5521



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**Training Feedback**

To ensure quality training we ask all participants to please fill out an online session evaluation

- Go to: <http://s.zoomerang.com/s/BruceHoner>
- Evaluation form is specific to Bruce Honer
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to nancy.hoover@ed.gov; 202-377-4203

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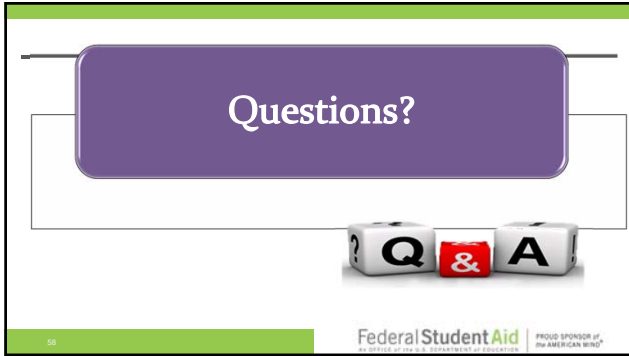
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