



# Pell Highlights: AskRegs FAQ

March 13, 2019

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March 2019



# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

Presented March 13, 2019



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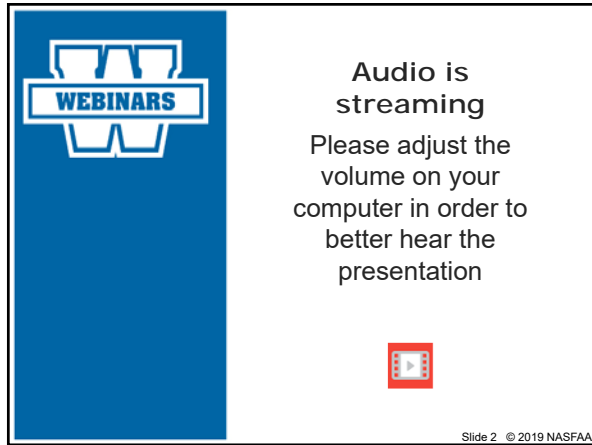
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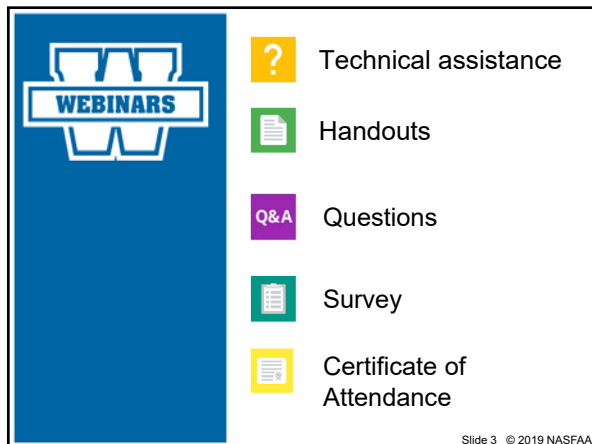
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**Introductions**

**Ashley Munro**  
Associate Director  
University of Alaska Fairbanks

**Kochie Vaughan**  
Regulatory Specialist  
NASFAA

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### AskRegs Knowledgebase



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### Goals

- Test your knowledge by reviewing questions about the Federal Pell Grant Program frequently asked by NASFAA members

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# NASFAA's Webinar Series Pell Highlights: AskRegs FAQ Presented March 13, 2019

Topics

- Student Eligibility
- Lifetime Eligibility Used (LEU)
- Recalculation
- Year Round Pell
- Transfer Students

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FAQs:  
Student Eligibility

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Question 


Are we required to disburse a Federal Pell Grant if the student's remaining eligibility is \$1 or less?

Yes

No

It depends

I'm not sure

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### Answer

It Depends.

Primarily based on the school's policy for awarding whole dollars or cents/pennies, as well as the school's financial aid management system (FAMS) capabilities.

- Schools that award using whole dollars are expected to make Federal Pell Grant payments if the remaining eligibility is \$1.00.
- Likewise, if the school's policy is to award pennies and its FAMS allows it, then the school must award down to the penny (even one cent).



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### Scenario

- Student has a foreign degree and her transcript was evaluated by World Education Services (WES).
- The U.S. equivalency is listed as "First professional degree in medicine (Doctor of Medicine) from a regionally accredited institution."
- Student can practice medicine in Belarus but not in the U.S.
- Student does not consider herself to have a U.S. bachelor's first degree.



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### Question



Since she cannot practice medicine in the U.S., should the school consider that her degree is not a bachelor's or first professional degree, making her eligible for a Federal Pell Grant?

- Yes
- No
- It depends
- I'm not sure



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### Answer

No. A student with a first professional degree from a foreign institution generally is not eligible to receive a Federal Pell Grant unless he or she can document that the degree is not the equivalent to at least a U.S. bachelor's degree.

Based on the scenario, you have documentation that the student's degree is equivalent to at least a bachelor's degree earned in the United States.

The student is not eligible to receive Federal Pell Grant funds.



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### Question



Can we award a Federal Pell Grant for the entire academic year if a student regains satisfactory academic progress (SAP) eligibility after the end of the fall term?

- Yes
- No
- It depends
- I'm not sure



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### Answer

No. If you determine before or at the beginning of a payment period that a student is not maintaining SAP but the student meets SAP standards at the end of the payment period, you may not pay the student any Title IV aid, including a Federal Pell Grant, for the completed payment period.



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### Answer

However, according to guidance NASFAA has received from the ED, there is no regulatory prohibition on retroactive SAP appeals; it would be up to the institution.

Keep in mind that the appeal would need to be:

- Based on the student's situation before the fall term, so it would be as if she was late in submitting an appeal for the fall and spring terms.
- The student could not use her success during the fall term as an after-the-fact justification for her appeal for fall and spring.



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### Scenario

The student graduated at the end of the spring term, and the Federal Pell Grant had not been disbursed at that point. The school can pay student based on the retroactive disbursement regulations.

- True
- False



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### Answer

False.

This would be considered a late disbursement, since the student is no longer enrolled in any payment period within the same award year. See [34 CFR 668.164\(j\)](#)



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### Question



Can we retroactively pay a Pell Grant if the student graduated at the end of fall and is enrolled as a graduate student in the spring?

- Yes
- No
- It depends
- I'm not sure

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### Answer

Yes. As long as the student is still enrolled at the institution for the award year, you can make a retroactive Pell Grant payment for the fall term, even if the ISIR wasn't received until the spring term.

However, you can only pay a Federal Pell Grant for the courses the student completed during the fall term. See [34 CFR 668.164\(k\)](#) and Volume 3, Chapter 1 of the [FSA Handbook](#).

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### Scenario

- School's spring semester consists of two modules.
- A student enrolled in both modules as a half-time student.
  - The student dropped the Module 1 classes
  - Did not provide written confirmation of intent to enroll in future module
  - A return of Title IV funds (R2T4) calculation was performed.
- The student later returned and enrolled in additional courses in Module 2
- He is now considered to be a full-time student.
- The initial Pell calculation was performed during Module 1.



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### Question



If a student withdraws from Module 1 and subsequently enrolls in a later Module 2, do we use the initial Pell calculation from Module 1?

- Yes
- No
- It depends
- I'm not sure

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### Answer

Yes. The R2T4 regulations take precedence over any optional Federal Pell Grant recalculation policies. The student retains his or her original eligibility for that payment period and is treated as though he or she did not cease attendance. Reentry within 180 days 34 CFR 668.4(f).

The key phrase in the regulation regarding enrollment status upon the student's return is that the student is eligible for the amount of the Federal Pell Grant "for which he or she was eligible prior to withdrawal... provided the student's enrollment status continues to support the full amount of those funds."

In this case, the student's enrollment status prior to the withdrawal was half-time, which is the enrollment status the institution uses upon the student's return. In this scenario, the student's enrollment status supports "the full amount of those funds."

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### Scenario

- Student appealed to the FA office for more financial aid.
- During the appeal process, the school discovered that the student previously earned a bachelor's degree.
- School knows that they need to return his Pell Grant funds for the current award year.
- However, he also received a Pell Grant in both prior award years.
- He indicated that he was a first time undergraduate on his FAFSA for both prior years.



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**Question** 

Is there any resolution required for the Pell awarded for the last two years to a student who already had a bachelor's degree?

- Yes
- No
- It depends
- I'm not sure

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**Answer**

Yes.

- With the errors that occurred in the previous award years, overpayment issues exist.
- The overpayments must be resolved before the student is eligible for aid.
- Corrections must be made and funds must be returned for the closed award years.

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**FAQs:  
Lifetime Eligibility Used  
(LEU)**

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## Pell Highlights: AskRegs FAQ

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### Question



Should a school round a student's Federal Pell Grant award down if his or her remaining Lifetime eligibility is less than a scheduled award?

- Yes
- No
- It depends
- I'm not sure

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### Answer

- It Depends. Schools should submit Pell awards for students who are close to using their lifetime eligibility as close as possible to remaining eligibility.
- Since the Common Origination and Disbursement (COD) accepts cents, you would enter the award including cents, if you report payments to COD in cents. See Volume 3, Chapter 3 of the [FSA Handbook](#).

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Full-time Enrollment Current LEU 599.53% Scheduled Award \$6095	
<b>School A</b> Pays Pell Using Whole Dollars	<b>School B</b> Pays Pell Using Cents
<ul style="list-style-type: none"> <li>• 0.47% remaining LEU</li> <li>• <math>\\$6,095 \times 0.47\% = \\$28.6465</math></li> <li>• School must round down to \$28 (0.46%)</li> <li>• \$29 would exceed the maximum LEU</li> </ul>	<ul style="list-style-type: none"> <li>• 0.47% remaining LEU</li> <li>• <math>\\$6,095 \times 0.47\% = \\$28.6465</math></li> <li>• School pays \$28.65</li> <li>• Does not exceed maximum LEU</li> </ul>

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**Question** 


Is a school required to return funds if a student is over his Pell LEU by .003?

Yes

No

It depends

I'm not sure

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**Answer**

Yes. There is no tolerance for awarding a student above his Federal Pell Grant LEU. See [GEN-13-14](#):

"Liability for Exceeding the 600% LEU Maximum

Prior to each disbursement, institutions are required to review the student's records to ensure that the student is eligible for the financial aid disbursement. If the institution has information that indicates that the student is not eligible for all or part of that disbursement because of the LEU limit, it must cancel or reduce, as appropriate, the student's Pell Grant award. If an institution disbursed Pell Grant funds beyond the student's eligibility because it failed to follow regulatory and operational procedures, the institution is liable for the overpayment and must make the necessary COD System adjustments."

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**Scenario**

- A student has received 597.247% of his maximum lifetime limit of 600%.
- The student has a \$3,300 in Scheduled Award for the award year.
- Because the student only has 2.753% remaining in eligibility, school calculates his maximum Federal Pell Grant award would be \$90.85 ( $\$3,300 \times .02753$ ).



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**Question** 

Would this student be eligible for any Federal Pell Grant during the award year even though the \$90.85 is obviously less than the minimum Federal Pell Grant Scheduled Award for the award year?

- Yes
- No
- It depends
- I'm not sure

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**Answer**

Yes. The student would be eligible to receive up to her remaining Federal Pell Grant eligibility for the award year (i.e., \$90.85).

The statutory minimum award provisions refers to the determination of the eligible EFC range for receipt of a Federal Pell Grant, not to situations in which a Pell-eligible student cannot receive his or her full Scheduled Award due to being near the lifetime eligibility limit.

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**Question** 

Is there an appeal process for Pell LEU?

- Yes
- No
- It depends
- I'm not sure

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## Pell Highlights: AskRegs FAQ

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### Answer

- Yes, but the student or school only can appeal to dispute the accuracy of the student's Federal Pell Grant data that resulted in the student's LEU level in the Common Origination and Disbursement (COD) System.
- Please see Volume 3, Chapter 3 of the [FSA Handbook](#) and the [April 18, 2014 Electronic Announcement](#) for the guidance on the procedures for submitting Pell Grant LEU disputes.

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### FAQs: Recalculation

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### Question



If a student registers for more courses after the census date, can we recalculate the Federal Pell Grant based on the new enrollment status?

- Yes
- No
- It depends
- I'm not sure

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### Answer

No. If an initial Federal Pell Grant calculation was performed prior to the Pell recalculation date (PRD), often referred to as census date, any enrollment adjustments made after that date would not prompt a recalculation of the student's Federal Pell Grant.

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### Modules

Two Policy Options:

- One PRD applies to full payment period
  - Adds or withdrawals after PRD do not prompt recalculation
  - Required recalculations still apply (not initiating attendance)
- One PRD applies to each module
  - Only one PRD applies to each student
  - PRD is based on the last class in which the student enrolls

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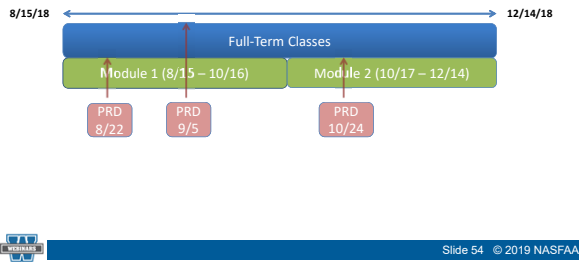
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### PRDs and Modules

Sunshine College has a term start date of 8/15/18 and term end date of 12/14/18. The school has three different PRDs of 8/22/18, for Module 1 courses, 9/5/18 for full-term courses, and 10/24/18 for Module 2 courses.



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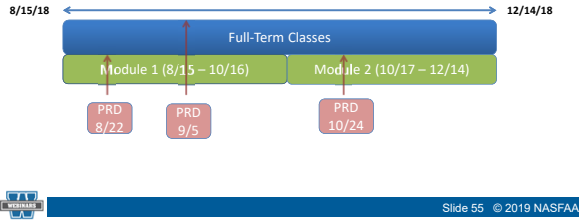
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### PRDs and Modules

Kyler is scheduled to attend 6 credits in full-term courses, 3 credits in Module 1 and 3 credits in Module 2. She completes Module 1 but drops a full-term course (3 credits) on 9/10 and the Module 2 course (3 credits) on 10/20. Since she began attendance in the Module 2 course, 10/24 PRD is used. Enrollment status for Pell = 6 credit-hours.



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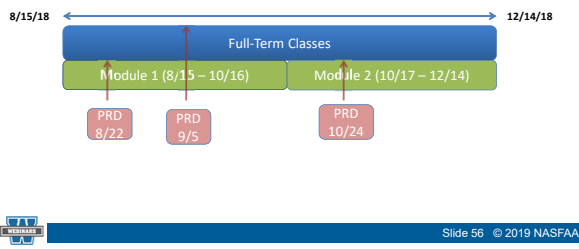
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### PRDs and Modules

Toney is scheduled to attend 6 credits in full-term courses, 3 credits in Module 1 and 3 credits in Module 2. He drops a full-term course (3 credits) and the Module 2 course on 9/10. Since he never began attendance in the Module 2 course, the 9/5 PRD is used. Enrollment status for Pell = 9 credit-hours.



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### Scenario

- Student was originally paid Pell for 14 credit hours.
- He ended the semester with a passing grade in seven credits
- He received an unearned "F" grade in 7 credits because he ceased attendance the classes.



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**Question** 


Is a Pell Grant adjustment necessary?

Yes

No

It depends

I'm not sure

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**Answer**

- It Depends. In part based on your school's recalculation policy [see [34 CFR 690.80\(b\)](#)].
- You must determine if the student initiated attendance in the 7 credits:
  - If he did initiate attendance and if the school has a Pell recalculation date, whether or not the student was still attending the seven credits as of the PRD would determine the need to recalculate the Pell.
  - If the student never initiated attendance in the 7 credits, a recalculation is required.

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**Scenario**

- School has a single PRD for the payment period.
- For some classes offered in modules, a student cannot add the class to his or her schedule until he has passed a prerequisite class which is being offered in a previous module.
  - The prerequisite class may end after the PRD meaning a student can't add other classes until after the PRD.
  - The school's administration believes it is merely a matter of backdating the courses students wish to add to remedy the problem of not increasing Pell awards after the PRD.



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## Pell Highlights: AskRegs FAQ

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**Question** 


Can an institution backdate a student's enrollment to allow an increase to a Federal Pell Grant award?

Yes

No

It depends

I'm not sure

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**Answer**

No. There is nothing in regulations allowing schools to backdate enrollment for purposes of awarding Pell Grants.

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**Scenario**

- A student is enrolled in three classes offered consecutively in Modules 1, 2, and 3 during the semester.
- While still attending Module 1, she drops the class in Module 2 and enrolls in a different course with the same number of credits.



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## Pell Highlights: AskRegs FAQ

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**Question** 


Does the Pell enrollment status remain the same when a student drops a course but replaces it with a different course?

Yes

No

It depends

I'm not sure

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**Answer**

It Depends.

Factors to consider:

- Has the student's overall enrollment status changed? It is not the specific courses that make up that enrollment status that determine whether the school must perform a recalculation.
- In this scenario, the student's enrollment status remains the same, so a Pell recalculation is not performed.
  - If the swapped course carried a different number of hours, the Federal Pell Grant must be recalculated as of the PRD, if the school has a Pell Grant recalculation policy based on a PRD.

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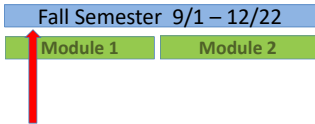
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**Example**

- Rosie, a Pell recipient, attends Central University in the Fall Semester which starts on 9/1 and has one PRD on 9/12
- On 8/31, she registers for 3 hours in Module 1 and 3 hours in Module 2 and begins attendance in Module 1 on 9/1
- CU packages Rosie with a ½ time Federal Pell Grant



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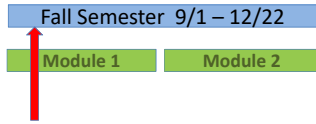
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### Example

- Rosie is taking HIST 101 (3 credit hours) during Module 1
- She registered for HIST 102 (3 credit hours) for Module 2
- After the PRD, Rosie decides that she isn't enjoying History and she drops the HIST 102 class that was going to occur in Module 2
- She replaces it with GEOL 101 (3 credit hours) and attends the course.



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### Question



Does Rosie's Pell get recalculated?

- Yes
- No
- It depends
- I'm not sure

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### Answer

No.

- She was half time on the PRD
- She substantiated that status with enrollment and attendance in HIST 101 and GEOL 101

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FAQs:  
Year Round Pell  
(YRP)

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Question

Does a student lose his year-round Pell Grant if he drops below half-time during the payment period?

Yes

No

It depends

I'm not sure

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Answer

It depends. Based on PRD whether the school has an optional Pell policy.

- **No Pell Recalculation Date Policy:** The student would not lose the Pell amount that was disbursed while the student was eligible and enrolled at least half time.
- **Pell Recalculation Date Policy:** If the student's enrollment status changes to less than half time prior to that date, the student would **not** be eligible for the additional Pell Grant funds under YRP.
- **Regardless of Whether the School Has a Pell Recalculation Date:** The student must begin at least one day in enough classes to establish half-time enrollment during the payment period or term in which he or she is receiving the additional funds under YRP.

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# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

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**Question** 

Does year-round Pell apply to clock-hour programs?

Yes

No

It depends

I'm not sure

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**Answer**

Yes.

The student can receive Federal Pell Grant funds up to 150 percent of his or her Scheduled Award for the award year under the YRP rules if the clock-hour program is:

- Longer than one academic year; **and**
- Shorter than two full academic years; **and**
- The entire program falls within a single award year (with or without a summer crossover period).

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**Clock-Hour Program Example**

- 1,215 clock-hour program lasting 37 weeks
- School defines the program's academic year as 900 clock hours and 26 weeks
- Entire program within the 2018-19 award year
- Student enrolls full time in all payment periods
- Student's Pell Grant Scheduled Award is \$6,095 for 2018-19

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# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

Presented March 13, 2019

2018-19 Award Year (AY Definition: 900 clock hours/26 weeks)		
Payment Period 1	Payment Period 2	Payment Period 3
<ul style="list-style-type: none"> <li>• 450 hours</li> <li>• 13 weeks</li> </ul>	<ul style="list-style-type: none"> <li>• 450 hours</li> <li>• 13 weeks</li> </ul>	<ul style="list-style-type: none"> <li>• 315 hours</li> <li>• 11 weeks</li> </ul>
<ul style="list-style-type: none"> <li>• Full time</li> <li>• \$3,048</li> <li>• 50% used</li> </ul>	<ul style="list-style-type: none"> <li>• Full time</li> <li>• \$3,047</li> <li>• 50% used</li> </ul>	<ul style="list-style-type: none"> <li>• Full time*</li> <li>• \$2,133</li> <li>• 35% used</li> </ul>
Initial Scheduled Award		2nd Scheduled Award*

\*To qualify (max 50%), student must be enrolled at least half time

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2018-19 Award Year (AY Definition: 900 clock hours/26 weeks)		
Payment Period 1	Payment Period 2	Payment Period 3
<ul style="list-style-type: none"> <li>• 450 hours</li> <li>• 13 weeks</li> </ul>	<ul style="list-style-type: none"> <li>• 450 hours</li> <li>• 13 weeks</li> </ul>	<ul style="list-style-type: none"> <li>• 315 hours</li> <li>• 11 weeks</li> </ul>
<ul style="list-style-type: none"> <li>• Full time</li> <li>• \$3,048</li> <li>• 50% used</li> </ul>	<ul style="list-style-type: none"> <li>• Full time</li> <li>• \$3,047</li> <li>• 50% used</li> </ul>	<ul style="list-style-type: none"> <li>• Full time*</li> <li>• \$2,133</li> <li>• 35% used</li> </ul>
Initial Scheduled Award		2nd Scheduled Award*

\*To qualify (max 50%), student must be enrolled at least half time

**135%**

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**Question** 

To receive year-round Pell, must the student's half time enrollment be paid in full by the additional Pell funds?

Yes

No

It depends

I'm not sure

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# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

Presented March 13, 2019

### Answer

No. According to guidance NASFAA has received from the U.S. Department of Education (ED)

- The student simply has to have a Federal Pell Grant enrollment status of half time to receive additional Pell funding during the YRP payment period in question.
- This is true regardless of how many hours are being paid by initial Pell and additional Pell.

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2018-19 Scheduled Award - \$5,545		
Summer 2018 <small>Assigned to the 2018-19 AY</small>	Fall 2018	Spring 2019
<ul style="list-style-type: none"> <li>• Assigned to the 2018-19 AY</li> <li>• 3/4 Time</li> <li>• Award - \$2,079.50</li> <li>• 37.5022% of the Scheduled Award</li> </ul>	<ul style="list-style-type: none"> <li>• Full-Time</li> <li>• Award - \$2,772.50</li> <li>• 50.0000% of the Scheduled Award</li> </ul>	<ul style="list-style-type: none"> <li>• Full-Time *</li> <li>• Award - \$2,772.50</li> <li>• 50.0000% of the Scheduled Award</li> </ul>
87.5022% Received From Initial Scheduled Award		12.4978% Initial Award + 37.5022% Second Award

\*To qualify (max 50%), student must be enrolled at least half time

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### Semester Example

- The additional Pell Grant award cannot exceed 50% of a student's Pell Grant Scheduled Award.
- Spring 2019 Pell award:
  - 12.4978% (\$693) remaining from the initial Pell Grant Scheduled Award
  - 37.5022% (\$2,079.50) from the additional Pell Grant award.
- The student has 12.4977% (\$693) remaining from the additional Pell Grant award for the 2018-19 award year.
  - If Summer 2019 treated as a trailer to the 2018-19 award year, could receive that amount, if enrolled at least half-time
- If the student had used 100% of his Pell Grant Scheduled Award during Summer 2018 and Fall 2018, the entire Spring 2019 award amount would be from the additional Pell Grant award.

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# NASFAA's Webinar Series


## Pell Highlights: AskRegs FAQ

Presented March 13, 2019

Question 

If a transfer student's EFC has changed can schools still award year-round Pell?

- Yes
- No
- It depends
- I'm not sure

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Answer

Yes. According to guidance NASFAA received from the ED:

“The institution would calculate Pell for the payment period as they would normally do—so long as the student is enrolled at least half-time when receiving the additional Pell. The limitation is that the student can't receive more than 150% total for the award year.”

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**FAQs:  
Transfer Students**

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# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

Presented March 13, 2019

### Scenario

- A student initially began the fall semester at one school and withdrew a few days after the Federal Pell Grant was disbursed.
- The initial school reduced the Pell Grant amount in order to keep a small portion of the grant.
- The student is currently enrolled at a different institution for the fall semester.



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### Question

Can the new school disburse a Pell Grant for a transfer student who withdrew from another school after receiving part of his Scheduled Award?

- Yes
- No
- It depends
- I'm not sure



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### Answer

Yes, as long as the student is no longer enrolled at the prior school for the fall semester, so that the student is not receiving Federal Pell Grant or IASG payments concurrently from more than one school, the student may receive Pell Grant funds for the fall semester at the new school.

School must ensure the percentage of the Scheduled Award received at both schools does not exceed 100 percent (or 150%, as applicable), and that the student's maximum Lifetime Eligibility Used (LEU 600% in COD) is not exceeded.

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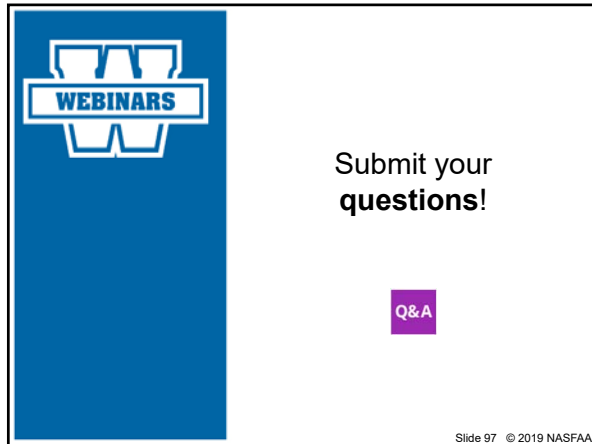
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# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

Presented March 13, 2019



Submit your questions!

Q&A

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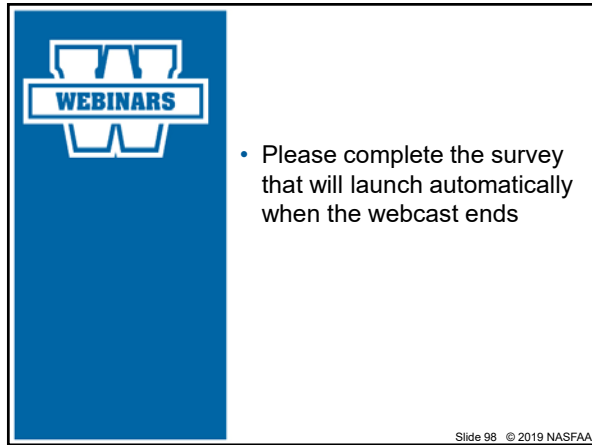
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- Please complete the survey that will launch automatically when the webcast ends

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NASFAA's 2018-19 Webinar Series

Graduate/Professional School  
Town Hall  
March 20, 2019  
2:00 p.m. ET

Building Bridges to  
Mitigate Bias  
April 24, 2019  
2:00 p.m. ET

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# NASFAA's Webinar Series

## Pell Highlights: AskRegs FAQ

Presented March 13, 2019

**NASFAA**

**NASFAA U**

**ENROLL IN A NASFAA U ONLINE COURSE TO:**

- CONNECT WITH YOUR INSTRUCTOR
- COLLABORATE WITH YOUR PEERS
- RECEIVE THE SELF-STUDY GUIDE (WHEN AVAILABLE)
- WORK TOWARD EARNING CREDENTIALS

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**NASFAA U**

**2018-19 Course Schedule**

*Remaining Courses:*

Direct Loans – 4/1/19

Nontraditional Calendars & Programs: The Title IV Implications – 4/30/19

Overview of the Financial Aid Programs – 7/8/2019

Watch *Today's News* this summer for announcement of the 2019-20 NASFAA U Online Course Schedule!

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**Thank you for joining us!**

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NASFAA's Webinar Series  
**Pell Highlights: AskRegs FAQ**  
Presented March 13, 2019



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# What's next?

## Please join us for the 2018-19 NASFAA Webinar Series



NASFAA's [live webinars](#) bring you the latest information, hot off the press, and allow you to actively engage with NASFAA staff and featured presenters from government, partner organizations, and fellow aid administrators.

[On Demand Webinars](#) are recordings of previously broadcasted events. The recordings are available for purchase and viewing at your convenience.

### Webinar Schedule for 2018-19 - See You Online!

Topic	Air Date
A Deep Dive Into Campus-Based Programs	08/01/2018
2019-20 FAFSA: Brave New World	09/12/2018
Citizenship Status and Title IV Aid Eligibility	10/03/2018
A Panel Discussion on NASFAA Peer Review Services	10/16/2018
Return of Title IV Funds Highlights: AskRegs FAQ	10/24/2018
Verification: 2019-20	11/14/2018
NASFAA Policy Update	12/04/2018
A Day Short and a Dollar...Late? Or is That Retroactive or Post Withdrawal?	12/12/2018
Which Is It? A Correction, Update, or PJ?	01/23/2019
A Panel Discussion on NASFAA Peer Review Services	02/05/2019
Diversity Discussion	02/20/2019
Pell Highlights: AskRegs FAQ	03/13/2019
Graduate/Professional School Town Hall	03/20/2019
Building Bridges to Mitigate Bias	04/24/2019
Exploring NASFAA Benefits	05/07/2019
Consumer Information Disclosures Highlights: What? When? Who?	05/15/2019
NASFAA Policy Update	05/29/2019
Sharing Student FAFSA Data to Assist Students: What is Permitted?	06/05/2019

\* Complimentary for all Members. All other webinars are offered at the following rates: Site License: \$120 members/\$240 non-members/no charge for [webinar package](#) purchasers or Value Plus Members.

**This listing is current as of July 31, 2018. For additions and changes to this schedule, visit [nasfaa.org/2018-19-webinars](http://nasfaa.org/2018-19-webinars)**

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NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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