



# Title IV Eligibility: Adding Programs

March 15, 2017



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March 2017



# NASFAA Webinar

## Title IV Eligibility: Adding Programs

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### Table of Contents

Slides .....	1
NASFAA Title IV Eligibility Checklist for Domestic Institutions: Considerations for Adding New Programs and Locations .....	25
Checklist: Information Needed for Approval of a Comprehensive Transition and Postsecondary Program .....	35
DCL GEN-13-10: Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs – March 19, 2013 .....	37
DCL GEN-11-01: Guidance Regarding Comprehensive Transition and Postsecondary (CTP) Programs for Students with Intellectual Disabilities – January 19, 2011 .....	43
Glossary for Title IV Eligibility: Adding Programs .....	45

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## Title IV Eligibility: Adding Programs

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National Association of Student Financial Aid Administrators

NASFAA's 2016-17 Webinar Series

**Title IV Eligibility:  
Adding Programs**

March 15, 2017



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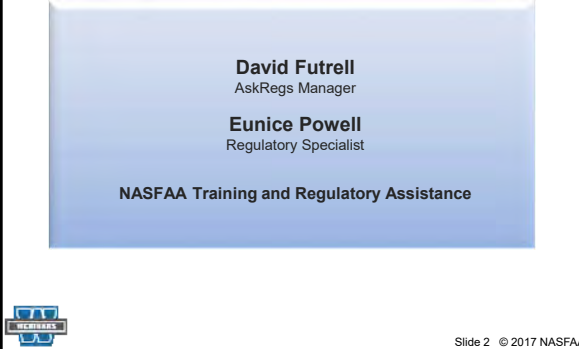
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Introduction: NASFAA Staff

**David Futrell**  
AskRegs Manager

**Eunice Powell**  
Regulatory Specialist

NASFAA Training and Regulatory Assistance



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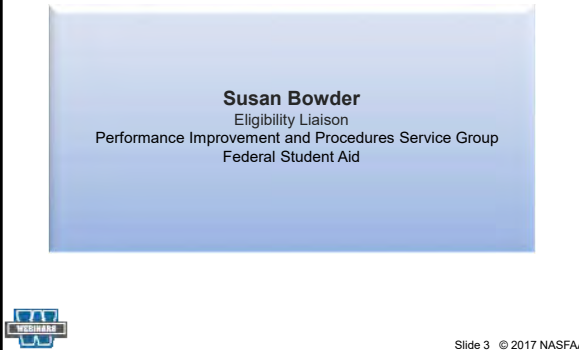
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Introduction: Department of Education

**Susan Bowder**  
Eligibility Liaison  
Performance Improvement and Procedures Service Group  
Federal Student Aid



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## Title IV Eligibility: Adding Programs

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Questions and Answers



**Submit your questions throughout the broadcast!**



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Goals

- Review planning before offering a new academic program
- Examine the role of the financial aid office when establishing a new academic program
- Provide the requirements for establishing a Title IV-eligible program



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Issues When Developing a New Program



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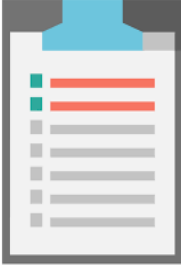


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Setting Up a New Academic Program



- Requirements related to administering new academic program must be considered
- Early collaboration between administrative and academic offices is key

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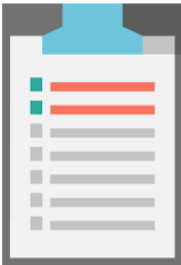
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Setting Up a New Academic Program



- Address academic and administrative issues up front

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POLL

- At your institution, how involved is the financial aid office in the establishment of a new academic program?
  - Financial aid is brought onboard at the first discussion of a new program.
  - Financial aid is notified after most of the academic decisions have been made.
  - Financial aid is notified when the program is advertised to the general student body.
  - Financial aid is not included in the process. We are the last to know!

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**Overview of Academic Issues**



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**Overview of Academic Issues**

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**Academic Level**

Institution must determine

Type of educational program

- Associate degree
- Bachelor's degree
- Master's or doctoral degree
- First professional degree
- Postbaccalaureate
- Post-graduate
- Comprehensive transition and postsecondary (CTP)



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## Title IV Eligibility: Adding Programs

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### AskRegs Question



How does an institution determine the academic level/category (i.e., postbaccalaureate, masters, first professional, etc.) for their certificate programs?



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### AskRegs Answer

- Determine program level classification by:
  - Academic requirements for the programs
  - Level of the courses offered
  - Level of the students classified
- If program meets all program eligibility requirements in 34 CFR 668.8 for Title IV eligibility



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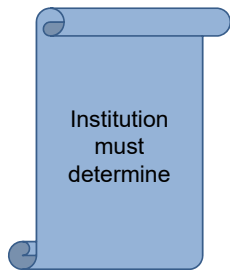
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### Credential Awarded



Upon completion of the program, student receives:

- Certificate;
- Degree;
- Diploma;
- Other educational credential; or
- No educational credential?



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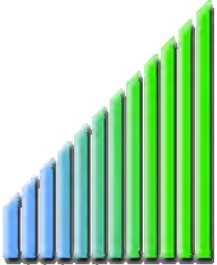


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### Student Learning Measurement



How is learning measured for the new program?

- Credit hours;
- Clock hours; or
- Direct assessment by the school or by others

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### Delivery of Instruction



How is instruction provided?

- Classroom setting;
- Distance education;
- Correspondence; or
- Combination of delivery methods

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### Admission



What are the requirements for admission to the program?

- Special testing required
- Limited program enrollment
- Requirements for transfer students

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## POLL

- In addition to what we have covered, which one of the following items would play a significant role in academic development of a new educational program at your institution?
  - a. Job placement for program graduates
  - b. Obtaining outside funding or using institutional resources to administer a new educational program
  - c. The marketing strategy to "target" the desired student population



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## Overview of Administrative Issues



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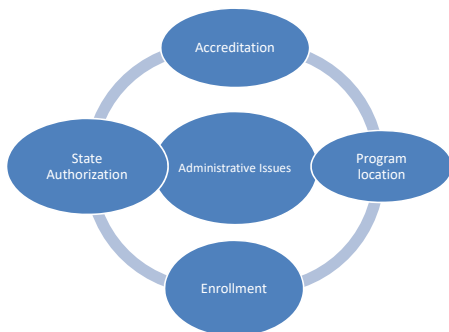
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## Administrative Issues



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### Accreditation

- Is the new program covered under the school's current notice of accreditation?
  - If not, does the school's accrediting agency require the program to be accredited?



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### Program Location

- Identify each location at which the school will offer the program
- If 50% or more of the program will be offered at a new location, has the school determined whether it will need to request and obtain U.S. Department of Education (ED) approval of the additional location?
- Is the new location accredited and licensed?



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### Program Location

- The eligibility of a school and its programs does not automatically include separate locations
- After receipt of the Eligibility and Certification Approval Report (ECAR), if a school wishes to add a location at which at least 50% of an educational program is offered, the school must notify ED
- Cannot disburse Title IV before reporting the location and submitting documentation to ED



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## Title IV Eligibility: Adding Programs

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### Program Location

ED's approval of new location always required before awarding Title IV aid if school:

- Is provisionally certified;
- Has been placed on reimbursement or cash monitoring payment methods;
- Has been notified by ED that it must apply for and await approval of a new location;
- Acquires the assets of another institution that provided educational programs at that location and participated in the Title IV programs during the preceding year; or
- Would be subject to a loss of eligibility under the cohort default rate regulations if it adds that location



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### State Authorization or Licensing



Does the state authorizing or licensing agency require the school to obtain authorization to offer the program?

- If required, has the school requested and obtained the necessary authorization or licensing?



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### State Authorization or Licensing

- In order for an institution in any state to be eligible to participate in the Title IV programs, it must be legally authorized by the state to provide a postsecondary educational program in that state
- As of July 1, 2015, institutions that are not compliant with the state authorization regulations may lose their eligibility to participate in the Title IV programs



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## Title IV Eligibility: Adding Programs

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### State Authorization or Licensing

- Effective 7/1/18, if the institution offers distance education or correspondence courses as part of an academic program, the institution must be authorized by each state in which the institution enrolls students, if such authorization is required by that state
- Regulation as it currently stands, so schools should start preparing now



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### Definition of Eligible Program

- Does the program meet the definition of an eligible program in 668.8?
- If the program is a postbaccalaureate degree program or leads to a baccalaureate or master's degree, is the program designed to prepare an individual to teach as a highly-qualified teacher in a designated high-need field under the Teacher Education Assistance for College and Higher Education (TEACH) Grant regulations?



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### AskRegs Question



We have numerous students with an "ineligible" major status. The major is "Not Listed," but the students have indicated an educational goal of bachelor's degree, associate degree, etc. Consequently, we disburse aid to these students who have the educational goal, but no major/program listed. Is this in compliance with the federal regulations?



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## Title IV Eligibility: Adding Programs

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### AskRegs Answer

- Student generally must be a regular student in a degree, certificate, or other recognized educational credential to be Title IV-eligible [600.2; 668.32(a)]
- A declared major is not a student eligibility requirement, per verbal confirmation from ED staff
- Schools must report the Classification of Instructional Program (CIP) code and program length associated with the degree/certificate program in which the student is enrolled to the Common Origination and Disbursement (COD) System and National Student Loan Data System (NSLDS)



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### Enrollment and Program Start

- How does the school define full-time status for students enrolled in the program?
  - Is school's definition of full time the same as that used by the financial aid office?
- When does the school plan to begin offering the program?
  - Will the school restrict when students may enroll in the program to certain times?



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### Administrative Issues



And still there is...

- Program structure
- Academic year definition
- Payment periods
- Satisfactory academic progress (SAP)
- Consumer information
- Technology and systems



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## Title IV Eligibility: Adding Programs

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### Administrative Issues

- Program Structure
- Academic Year Definition
- Payment Period

- Will the program be a term-based or nonterm program?
- What is the program's definition of an academic year for Title IV purposes?
- What are the payment periods for students enrolled in the program?

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### Administrative Issues

- SAP
- Consumer Information
- Technology and Systems

- What is the SAP policy for the program?
- Who is responsible for updating the school's student consumer information?
- Who is responsible for systems modifications or updates?

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### Policies and Procedures

- Assign responsibility for updating all relevant policies and procedures to incorporate the new program
- Establish a deadline for:
  - Completing the update
  - Training appropriate staff on the program's policies and procedures

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## Title IV Eligibility: Adding Programs


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**Setting Up a New Academic Program**



Consequences of failure to collaborate

- Delay in ED approval
- Delay in ability to disburse Title IV funding
- Impact on school's revenue



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**Setting Up a New Academic Program**



- Educate academic offices on the requirements for Title IV approval for a new program
- Create committee/sub-committee to work on development of new academic programs
- Develop a checklist and a timeline for obtaining approval of new programs



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**Overview of Adding New Educational Programs**



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## Title IV Eligibility: Adding Programs

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### ED Approval for New Programs

ED approval of a program as an eligible program is required if the institution:

- Is provisionally certified;
- Is a proprietary institution or postsecondary vocational institution subject to the two-year rule;
- Has been placed on the reimbursement or cash monitoring payment methods; or
- Has been notified by ED that it must apply for and await approval of a new program



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### ED Approval for New Programs

ED approval of a new program is required if the program is a:

- Direct assessment program;
- CTP program;
- Degree program that leads to a higher credential level of academic programs beyond the scope of the institution's current ED approval; or
- Short-term program (at least 10 weeks of instructional time and between 300 and 599 clock hours)



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### AskRegs Question



Our campus currently has only undergraduate degree options, but is considering adding a master's degree. Since this is new for us, our current financial aid staff is not knowledgeable about financial aid policies that apply to master's degree programs. What do we need to consider?



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## Title IV Eligibility: Adding Programs

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### AskRegs Answer

- School must notify ED and obtain its approval of the program before Title IV funds may be disbursed to any students enrolled in the program
- School must have received both the required state and accrediting agency approvals



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### School Determination of a New Program



- Schools may self-determine eligibility for a new program and disburse Title IV funds to students without prior approval by ED in three instances



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### School Determination of a New Program

#### One

- New program leads to an:
  - Associate degree,
  - Bachelor's degree, or
  - Graduate or professional degree; and
- School has already been approved to offer programs at that level



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## Title IV Eligibility: Adding Programs

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### Example: Sunny University

- Sunny University (SU) offers educational programs which lead to bachelor's and graduate degrees
- SU developed a new educational program in Information Technology
- The new program leads to a bachelor's degree
- SU may self-determine the new program's Title IV eligibility as SU has prior ED approval of programs at this level



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### School Determination of a New Program

Two

- Program is a graduate or an undergraduate program requiring students in the program to have:
  - An associate degree or higher, *and*
  - Program provides at least a 10-week program of either 8 semester hours or 12 quarter hours of instruction *and* prepares students for gainful employment in the same or a related recognized occupation as a program ED previously approved



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### Example: Blossom College

- Blossom College offers educational programs which lead to a graduate degree
- Blossom developed a new program in Information Technology Management that is 30 weeks and 24 credit hours and leads to a graduate degree



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## Title IV Eligibility: Adding Programs

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### Example: Blossom College

- New students entering this program must have a bachelor's degree
- Blossom may self-determine the new program's eligibility as it has prior ED approval of educational programs at this level



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### School Determination of a New Program

Three

- Program is an undergraduate program that:
  - Admits students who *have not* completed the equivalent of an associate degree, and
  - Program provides at least 15 weeks of program instruction with 16 semester hours, 24 quarter hours, or 600 clock hours; and
- Program prepares students for gainful employment in same or related recognized occupation as programs previously approved by ED



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### Example: First-Rate Community College

- First-Rate Community College (FRCC) has developed a new undergraduate certificate program in Medical Coding, which at completion prepares students for gainful employment
- New program is 30 weeks of instructional time and 36 quarter hours



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### Example: First-Rate Community College

- Students entering the new program must have a minimum of a high school diploma or equivalent
- FRCC may self-determine the new program's eligibility as it has prior ED approval of educational programs at this level



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### Determining New Program Eligibility

- When "self-certifying" new programs as Title IV-eligible, schools first must have both the required state and accrediting agency approvals
- School must include "self-certified" programs on its next recertification application and provide proof of state and accrediting agency approvals



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### Programs Requiring ED Notification Only

- School does not have to wait to disburse Title IV funds to students in the new program
- School notifies ED by updating its Application for Approval to Participate in Federal Student Aid Programs (E-App) during next recertification



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## Title IV Eligibility: Adding Programs

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### Example: Well-Being Community College

- 2-year public institution
- Currently offers Undergraduate Medical Assisting Program
  - Program offers a certificate
- New program added: Undergraduate Medical Coding
  - Program offers a certificate; has same CIP code
  - Triple Purpose State Accrediting Agency does not consider this to be a new program
- School may award/disburse Title IV funds
- School required to notify ED of the new program during next recertification



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### POLL

- Based on the criteria presented, do you or will you self-certify new programs as eligible Title IV programs?
  - a. Yes
  - b. No



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### ED Approval Required for All Other Programs

- In all other cases, the eligibility of the new educational program must be determined by ED before the school awards Title IV funds
- School completes the E-App and submits copies of approval from state authorizing and accrediting agencies
- ED will make determination of eligibility
- Schools can only disburse Title IV funds after receiving ED Approval Letter



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## Title IV Eligibility: Adding Programs

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### Examples of Programs Requiring ED Approval

- Schools must obtain ED's approval for a:
  - New academic program if the program is a direct assessment program or CTP program; or
  - Program that increases the credential level offered by the institution



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### Question and Answer Segment



Your questions,  
please!



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### Survey!

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**Verification and Professional Judgment in a PPY world**  
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**Return of Title IV Funds: Common Questions and Audit Findings**  
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## Title IV Eligibility: Adding Programs

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**2016 – 17 Course Schedule**

- Overview of the Financial Aid Programs – 9/12/16
- Student Eligibility – 10/3/16
- Cash Management – 10/18/16
- Verification – 11/17/16
- Return of Title IV Funds – 1/30/17
- Consumer Information – 2/27/17
- Gainful Employment – 3/27/17
- Professional Judgment – 4/25/17
- Overview of the Financial Aid Programs – 7/10/17

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**NASFAA STUDENT AID INDEX**

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[NASFAA.ORG/INDEX](http://NASFAA.ORG/INDEX)

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NASFAA's Webinar Series  
Title IV Eligibility: Adding Programs  
Presented March 15, 2017

Thank you for  
joining us!



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# NASFAA Title IV Eligibility Checklist for Domestic Institutions:

## Considerations for Adding New Programs and Locations

The following chart represents a checklist guide to adding new academic programs and locations at domestic postsecondary institutions. It is **not** intended to be a comprehensive list; instead, it is intended to highlight the major areas the institution should review when establishing new programs and adding locations.

NASFAA suggests the institution conduct a comprehensive review of all Title IV institutional and program eligibility regulations and requirements prior to implementing a new program or additional location. Questions about adding and approving programs and locations should be directed to the institution's U.S. Department of Education (ED) School Participation Team (contact information follows the chart). Questions about awarding and disbursing aid may be researched using NASFAA's AskRegs Knowledgebase, accessed under the Tools & Resources tab on the [NASFAA website](#). NASFAA's *Compiled Title IV Regulations* and the NASFAA Compliance Engine with the Policies & Procedures Builder module are additional resources available under the Tools & Resources tab.

Guidance regarding the requirements for adding new academic programs and locations at foreign postsecondary institutions can be found on ED's [Foreign School Information website](#).

AREA TO REVIEW: ACADEMIC PROGRAM ELIGIBILITY		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Does the program meet the requirements for an eligible program (e.g., minimum length, credential earned, training provided, admissions criteria, etc.)?</li> <li>If the program measures student learning by credit or clock hours, does the number of hours assigned each course meet, as applicable, the regulatory definition of credit or clock hour?</li> <li>Is the new program subject to the clock-to-credit hour conversion?</li> <li>If a gainful employment (GE) program:               <ul style="list-style-type: none"> <li>Can the institution demonstrate a reasonable relationship between the length of the program and the entry-level requirements for the recognized occupation for which the program prepares the student; and</li> <li>Is the program not substantially similar to a program the institution offered in the prior three years that became ineligible due to its debt-to-earnings (D/E) rates or had failing or zone D/E rates and was voluntarily discontinued by the institution?</li> </ul> </li> <li>If an English as a Second Language (ESL) program, does the program admit only students who need instruction in English in order to be able to use the knowledge, training, or skills they already have?</li> </ul>	<ul style="list-style-type: none"> <li><i>Federal Register</i>, 10/29/10, pp. 66844 to 66857 (Definition of a Credit Hour)</li> <li>GEN-15-12</li> <li>GEN-14-23</li> <li>GEN-13-10</li> <li>GEN-11-06</li> <li>GEN-11-01</li> <li>Electronic Announcement, 6/6/11</li> <li>Gainful Employment Electronic Announcement #53, 5/20/15</li> <li>Gainful Employment Electronic Announcement #34, 4/27/12</li> <li>Gainful Employment Electronic Announcement #12, 7/8/11</li> <li>Gainful Employment Electronic Announcement #11, 6/24/11</li> <li>2016–17 <i>FSA Handbook: School Eligibility and Operations</i>, pp. 2-11 to 2-13, 2-17 to 2-36, 2-101 to 2-104</li> </ul>	<ul style="list-style-type: none"> <li>HEA 481(b)</li> <li>HEA 484(k),(l)</li> <li>34 CFR 600.2, <i>Clock hour, Credit hour, Educational program, Recognized occupation</i></li> <li>34 CFR 600.5(e)</li> <li>34 CFR 600.10(c)</li> <li>34 CFR 600.20(c)(1)-(3)</li> <li>34 CFR 600.21(a)(11)</li> <li>34 CFR 668.8</li> <li>34 CFR 668.10</li> <li>34 CFR 668.14(b)(26)</li> <li>34 CFR 668.231(a)</li> <li>34 CFR 668.232</li> <li>34 CFR 668.402, <i>Gainful employment program (GE program)</i></li> <li>34 CFR 668.403</li> <li>34 CFR 668.410(b)</li> <li>34 CFR 668.414</li> <li>34 CFR 686.2(d), <i>TEACH Grant-eligible institution, TEACH Grant-eligible program, Teacher preparation program</i></li> </ul>

**AREA TO REVIEW: ACADEMIC PROGRAM ELIGIBILITY (CONTINUED)**

CONSIDERATION(S) (CONTINUED)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>• If a direct assessment program, did the institution establish a methodology to equate the program (or the direct assessment portion of any program, as applicable) reasonably to credit or clock hours for purposes of complying with applicable regulatory requirements?</li> <li>• If a comprehensive transition and postsecondary (CTP) program, does the program contain all required components?</li> <li>• Does the program meet the additional eligibility requirements for Teacher Education Assistance for College and Higher Education (TEACH) Grant awards?</li> <li>• Except for GE programs, if the institution is required only to notify ED of the new program, is the institution aware it reports the new program by updating its Application for Approval to Participate in the Federal Student Aid Programs (E-App) at the time of the institution's next recertification?</li> <li>• For GE programs, is the institution aware it must update its E-App and provide the GE program certifications in 34 CFR 668.414 within 10 calendar days of adding the program or making any change impacting the certifications of an existing program?</li> <li>• If ED approval of the new program as an eligible program is required, has the school requested and obtained ED's approval before awarding and disbursing Title IV aid to students in the program?  <i>Note: ED's approval of a program as an eligible program always is required if the institution:</i> <ul style="list-style-type: none"> <li>➤ <i>Is provisionally certified;</i></li> <li>➤ <i>Is a proprietary institution or postsecondary vocational institution subject to the two-year rule;</i></li> <li>➤ <i>Has been placed on the reimbursement or cash monitoring payment methods; or</i></li> <li>➤ <i>Has been notified by ED that it must apply for and await approval of a new program.</i></li> </ul> <i>For all other institutions, ED approval of a new program is required if the program:</i> <ul style="list-style-type: none"> <li>➤ <i>Is a direct assessment program;</i></li> <li>➤ <i>Is a CTP program;</i></li> <li>➤ <i>Is a degree program that leads to a higher credential level of academic programs beyond the scope of the institution's current ED approval (e.g., adding graduate programs when previously only offering undergraduate programs); or</i></li> <li>➤ <i>Is a short-term program (i.e., program is at least 10 weeks of instructional time and between 300 and 599 clock hours).</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• ED's <a href="#">Program Integrity Questions and Answers—Credit Hour</a></li> <li>• ED's <a href="#">Gainful Employment—Frequently Asked Questions</a></li> </ul>	

**AREA TO REVIEW: ACADEMIC PROGRAM AGENCIES APPROVALS**

CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>• Does the institution have approval for the new program from its accrediting agency?</li> <li>• Is the institution legally authorized by the state where it is located to provide the educational program?</li> <li>• Effective 7/1/18, if the institution offers distance education or correspondence courses as part of an academic program, is the institution authorized by each state in which the institution enrolls students, if such authorization is required by the state?</li> <li>• If the program is a flight training program, does the institution have a current valid certification from the Federal Aviation Administration?</li> <li>• If a competency-based education program:               <ul style="list-style-type: none"> <li>➤ Do instructors meet accrediting agency standards for instruction in their subject; and</li> <li>➤ Is the amount of faculty resources dedicated to the program sufficient in the judgment of the institution’s accrediting agency?</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <i>Federal Register</i>, 12/19/16, pp. 92233 to 92252 (State authorization)</li> <li>• <i>Federal Register</i>, 12/19/16, pp. 92233 to 92252 (State authorization)</li> <li>• GEN-15-10</li> <li>• GEN-14-23</li> <li>• GEN-14-22</li> <li>• GEN-14-04</li> <li>• GEN-13-20</li> <li>• GEN-13-10</li> <li>• GEN-12-13</li> <li>• GEN-11-05</li> <li>• GEN-11-01</li> <li>• Gainful Employment Electronic Announcement #54, 6/11/15</li> <li>• Electronic Announcement, 6/6/11</li> <li>• 2016–17 <i>FSA Handbook: School Eligibility and Operations</i>, pp. 2-7 to 2-10, 2-17, 2-20 to 2-26, 2-101 to 2-106</li> <li>• ED’s <a href="#">Program Integrity Questions and Answers—State Authorization</a></li> <li>• ED’s <a href="#">database of recognized regional and national institutional accrediting agencies</a></li> </ul>	<ul style="list-style-type: none"> <li>• HEA 487(a)(21)</li> <li>• 34 CFR 600.9</li> <li>• 34 CFR 668.8</li> <li>• 34 CFR 668.10(b)(8)-(9),(d)</li> <li>• 34 CFR 668.232(e)</li> </ul>

AREA TO REVIEW: ADDITIONAL LOCATION		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Will at least 50 percent of the new program be offered at an off-site location and necessitate:               <ul style="list-style-type: none"> <li>➤ Just reporting that location to ED; or</li> <li>➤ Obtaining ED approval of that location?</li> </ul> <p><i>Note: ED's approval of an additional location always is required if the institution:</i></p> <ul style="list-style-type: none"> <li>➤ <i>Is provisionally certified;</i></li> <li>➤ <i>Has been placed on the reimbursement or cash monitoring payment methods;</i></li> <li>➤ <i>Has been notified by ED that it must apply for and await approval of a new location;</i></li> <li>➤ <i>Acquires the assets of another institution that provided educational programs at that location and participated in the Title IV programs during the preceding year; or</i></li> <li>➤ <i>Would be subject to a loss of eligibility under the cohort default rate regulations if it adds that location.</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: School Eligibility and Operations</i>, pp. 2-99 to 2-100</li> </ul>	<ul style="list-style-type: none"> <li>34 CFR 600.10(b)</li> <li>34 CFR 600.20(c)(1)</li> <li>34 CFR 600.21(a)(3), (d)</li> <li>34 CFR 600.32</li> </ul>
AREA TO REVIEW: ACADEMIC PROGRAM FORMAT AND STRUCTURE		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Is the program a credit-hour program offered in a standard term, nonstandard term, nonterm format, or a clock-hour program?</li> <li>If the program is offered in terms, will differing term lengths cause the program to be nonstandard term or nonterm for Title IV purposes?</li> <li>If courses are offered in a modular format, are modules combined into terms?</li> <li>Will all or a portion of the program be delivered by correspondence or distance education?</li> <li>What are the program's definitions of full-time, three-quarter-time, and half-time enrollment for student?</li> <li>How will retaking or repeating courses impact a student's enrollment status in the program?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: Student Eligibility</i>, pp. 1-17 to 1-18</li> <li>2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-6 to 3-9</li> <li>ED's <a href="#">Program Integrity Questions and Answers—Retaking Coursework</a></li> </ul>	<ul style="list-style-type: none"> <li>34 CFR 600.2, <i>Clock hour, Credit hour, Correspondence course, Distance education</i></li> <li>34 CFR 668.2(b), <i>Full-time student, Half-time student, Three-quarter-time student</i></li> <li>34 CFR 668.38</li> <li>34 CFR 690.8</li> </ul>
AREA TO REVIEW: ACADEMIC YEAR REQUIREMENTS		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Does the program meet the Title IV academic year definition requirements (i.e., minimum number of weeks of instructional time and minimum number of credit or clock hours)?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-3 to 3-5</li> </ul>	<ul style="list-style-type: none"> <li>HEA 481(a)</li> <li>34 CFR 668.3</li> </ul>



**AREA TO REVIEW: PACKAGING AND AWARDING POLICIES**

CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>• Will the new program’s target student population differ from the institution’s current student population?</li> <li>• If so, will this require reconsideration of the institution’s packaging policies (e.g., for nontraditional, independent, less-than-full-time students)?</li> <li>• If the program is an undergraduate program, which Federal Pell Grant calculation formula applies to the new program?</li> <li>• If the program is an undergraduate program, which formula for calculating Iraq and Afghanistan Service Grants (IASG) applies to the new program?</li> <li>• If the school participates in the TEACH Grant Program, which TEACH Grant calculation formula applies to the new program?</li> <li>• If the school participates in the Federal Direct Student Loan (Direct Loan) Program, will the institution be using a scheduled academic year (SAY) or a borrower-based academic year (BBAY) in its processing of Direct Subsidized Loans, Direct Unsubsidized Loans, and PLUS Loans?</li> <li>• Does the institution have packaging procedures for ensuring Federal Perkins Loans are awarded only to eligible undergraduate program borrowers due to the expiration of the Federal Perkins Loan Program?</li> <li>• What sequestration percentages apply to Direct Loan, IASG, and TEACH Grant awards?</li> </ul>	<ul style="list-style-type: none"> <li>• GEN-16-11</li> <li>• GEN-16-05</li> <li>• Electronic Announcement, 12/21/16</li> <li>• 150% Direct Subsidized Loan Limit: Electronic Announcement #20, 10/19/15</li> <li>• 2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-43 to 3-154</li> <li>• ED’s <a href="#">Federal Perkins Loan Frequently Asked Questions</a></li> </ul>	<ul style="list-style-type: none"> <li>• HEA 455(q)</li> <li>• 34 CFR 673.5</li> <li>• 34 CFR 673.6</li> <li>• 34 CFR 674.10</li> <li>• 34 CFR 674.12</li> <li>• 34 CFR 675.10</li> <li>• 34 CFR 676.10</li> <li>• 34 CFR 676.20</li> <li>• 34 CFR 685.200(a)(1)(iii),(a)(2),(b)(4),(e),(f)</li> <li>• 34 CFR 685.203</li> <li>• 34 CFR 685.301(a)</li> <li>• 34 CFR 685.303(e)</li> <li>• 34 CFR 686.21-25</li> <li>• 34 CFR 690.8</li> <li>• 34 CFR 690.62-66</li> </ul>

**AREA TO REVIEW: PAYMENT PERIODS AND DISBURSEMENTS**

CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>• Has the institution reviewed the general rules for determining payment periods and disbursements for students enrolled in the new program?</li> <li>• If the program is a nonstandard term credit-hour program, are the nonstandard terms substantially equal?</li> <li>• Has the institution defined the new program’s payment periods?</li> </ul>	<ul style="list-style-type: none"> <li>• 2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-9 to 3-31</li> <li>• 2016–17 <i>FSA Handbook: Processing Aid and Managing FSA Funds</i>, pp. 4-21 to 4-71</li> </ul>	<ul style="list-style-type: none"> <li>• 34 CFR 668.4</li> <li>• 34 CFR 668.164</li> </ul>

AREA TO REVIEW: PAYMENT PERIODS AND DISBURSEMENTS (CONTINUED)		
CONSIDERATION(S) (CONTINUED)	RESOURCES	CITATION(S)
<b>FEDERAL DIRECT STUDENT LOAN (DIRECT LOAN) PROGRAM</b>		
<ul style="list-style-type: none"> <li>• Has the institution set up the appropriate loan periods and disbursement dates appropriate for the new program?</li> <li>• Does the institution have policies and procedures for reporting academic year and loan period dates, as well as any change to those dates, to the Common Origination and Disbursement (COD) System for all Direct Loans made to students in the new program?</li> <li>• Does the institution have policies and procedures for reporting and updating program-level enrollment data to the COD System at the time of initial and/or subsequent disbursement(s) for all Direct Loans made to students in the new program?</li> <li>• Does the institution have policies and procedures for reporting campus-level and program-level enrollment data, as well as any changes to those data, to the National Student Loan Data System (NSLDS) for all Direct Loan borrowers enrolled in the new program?</li> </ul>	<ul style="list-style-type: none"> <li>• GEN-14-17</li> <li>• GEN-14-07</li> <li>• GEN-13-13</li> <li>• 150% Direct Subsidized Loan Limit: Electronic Announcement #23, 10/18/16</li> <li>• 150% Direct Subsidized Loan Limit: Electronic Announcement #19, 9/25/15</li> <li>• 150% Direct Subsidized Loan Limit: Electronic Announcement #17, 4/20/15</li> <li>• 150% Direct Subsidized Loan Limit: Electronic Announcement #16, 11/21/14</li> <li>• 150% Direct Subsidized Loan Limit: Electronic Announcement #15, 10/31/14</li> <li>• 2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-27 to 3-29, 3-31, 3-88, 3-116, 3-123 to 3-127</li> <li>• <i>NSLDS Enrollment Reporting Guide</i></li> <li>• 2016–17 <i>COD Technical Reference</i>, pp. II-1-172 to II-1-191</li> <li>• ED's <a href="#">150 Percent Direct Subsidized Loan Limit—Frequently Asked Questions</a></li> </ul>	<ul style="list-style-type: none"> <li>• 34 CFR 668.3</li> <li>• 34 CFR 668.4</li> <li>• 34 CFR 668.164</li> <li>• 34 CFR 685.301(a)</li> <li>• 34 CFR 685.303</li> </ul>
<b>FEDERAL PELL GRANT AND IRAQ AND AFGHANISTAN SERVICE GRANT (IASG) PROGRAMS</b>		
<ul style="list-style-type: none"> <li>• Has the institution set up its Federal Pell Grant and IASG payment periods and disbursement dates appropriate for the new program?</li> <li>• Does the institution have policies and procedures for ensuring students do not exceed the maximum Federal Pell Grant and IASG Lifetime Eligibility Used?</li> </ul>	<ul style="list-style-type: none"> <li>• GEN-16-19</li> <li>• GEN-16-01</li> <li>• GEN-13-14</li> <li>• 2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-25 to 3-26, 3-65 to 3-66</li> </ul>	<ul style="list-style-type: none"> <li>• HEA 401(c)(5)</li> <li>• 34 CFR 668.4</li> <li>• 34 CFR 668.164</li> <li>• 34 CFR 690.63-66</li> <li>• 34 CFR 690.76</li> </ul>

AREA TO REVIEW: PAYMENT PERIODS AND DISBURSEMENTS (CONTINUED)		
CONSIDERATION(S) (CONTINUED)	RESOURCES	CITATION(S)
<b>FEDERAL PERKINS LOAN PROGRAM</b>		
<ul style="list-style-type: none"> <li>Has the institution set up its Federal Perkins Loan-specific payment periods and disbursement dates appropriate for the new program?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-25 to 3-26, 3-136</li> </ul>	<ul style="list-style-type: none"> <li>34 CFR 668.4</li> <li>34 CFR 668.164</li> <li>34 CFR 674.16</li> </ul>
<b>FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT (FSEOG) PROGRAM</b>		
<ul style="list-style-type: none"> <li>Has the institution set up its FSEOG-specific payment periods and disbursement dates appropriate for the new program?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: Calculating Awards &amp; Packaging</i>, pp. 3-25 to 3-26</li> </ul>	<ul style="list-style-type: none"> <li>34 CFR 668.4</li> <li>34 CFR 668.164</li> <li>34 CFR 676.16</li> </ul>
<b>TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUCATION (TEACH) GRANT PROGRAM</b>		
<ul style="list-style-type: none"> <li>If participating in the TEACH Grant Program, has the institution set up its TEACH Grant-specific payment periods and disbursement dates appropriate for the new program?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: Calculating Awards and Packaging</i>, pp. 3-25 to 3-26</li> </ul>	<ul style="list-style-type: none"> <li>34 CFR 668.4</li> <li>34 CFR 668.164</li> <li>34 CFR 686.22(i)</li> <li>34 CFR 686.23</li> <li>34 CFR 686.31(a)</li> <li>34 CFR 686.33</li> </ul>
AREA TO REVIEW: TITLE IV CASH MANAGEMENT		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Will the new program require adjustments to the institution's cash management procedures (e.g., requesting, maintaining, and returning Title IV funds)?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: Processing Aid and Managing FSA Funds</i>, pp. 4-3 to 4-20</li> </ul>	<ul style="list-style-type: none"> <li>34 CFR 668.161-163</li> <li>34 CFR 668.165-166</li> </ul>
AREA TO REVIEW: RETURN OF TITLE IV FUNDS (R2T4)		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Is the payment period or the period of enrollment used to calculate the percentage of earned aid for students who withdraw from the new program?</li> <li>If any of the program's courses are modules (i.e., do not span, as applicable, the entire payment period or period of enrollment), does the institution have policies and procedures for identifying students enrolled in modular courses and monitoring their enrollment in those courses?</li> <li>Does the institution have a policy for taking attendance or does an outside entity have a requirement that the institution take attendance applicable to the new program?</li> <li>Will students enrolled in the new program be allowed to take a leave of absence, and if so, what is the institution's policy?</li> </ul>	<ul style="list-style-type: none"> <li><i>Federal Register</i>, 10/29/10, pp. 66892 to 66902 (R2T4 and Modules or Compressed Courses)</li> <li>GEN-11-14</li> <li>2016–17 <i>FSA Handbook: Volume 5 Withdrawals and the Return of Title IV Funds</i></li> <li>ED's <a href="#">Program Integrity Questions and Answers—Return of Title IV Funds</a></li> </ul>	<ul style="list-style-type: none"> <li>HEA 484B</li> <li>34 CFR 668.22</li> </ul>

AREA TO REVIEW: SATISFACTORY ACADEMIC PROGRESS (SAP)		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>Will the new program be monitored under the existing SAP policy used for other programs, or will the institution develop a SAP policy specific to the new program?</li> </ul>	<ul style="list-style-type: none"> <li><i>Federal Register</i>, 10/29/10, pp. 66879 to 66887 (Satisfactory Academic Progress)</li> <li>2016–17 <i>FSA Handbook: Student Eligibility</i>, pp. 1-13 to 1-17</li> <li>ED's <a href="#">Program Integrity Questions and Answers—Satisfactory Academic Progress</a></li> </ul>	<ul style="list-style-type: none"> <li>HEA 484(c)</li> <li>34 CFR 668.16(e)</li> <li>34 CFR 668.34</li> </ul>
AREA TO REVIEW: WRITTEN AGREEMENTS		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>If the new program involves courses taken at another institution under a written agreement (e.g., articulation, consortium, contractual, study abroad), does the agreement meet all applicable Title IV requirements?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: School Eligibility and Operations</i>, pp. 2-26 to 2-29</li> </ul>	<ul style="list-style-type: none"> <li>HEA 486A</li> <li>34 CFR 668.5</li> <li>34 CFR 668.10(e)</li> </ul>
AREA TO REVIEW: STUDENT CONSUMER INFORMATION		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>What changes are needed to required consumer information reports due to the addition of the new program or location?</li> <li>What updates are needed to the institution's consumer information disclosures due to the addition of the new program or location?</li> </ul>	<ul style="list-style-type: none"> <li>2016–17 <i>FSA Handbook: School Eligibility and Operations</i>, pp. 2-109 to 2-138</li> <li>ED's <a href="#">Gainful Employment—Frequently Asked Questions</a></li> </ul>	<ul style="list-style-type: none"> <li>HEA 485(a)(1)(G)</li> <li>34 CFR 668.5(e)</li> <li>34 CFR 668.414</li> <li>34 CFR 668, Subpart D</li> </ul>
AREA TO REVIEW: POLICIES AND PROCEDURES		
CONSIDERATION(S)	RESOURCES	CITATION(S)
<ul style="list-style-type: none"> <li>What adjustments need to be made to the institution's financial aid policies and procedures?</li> <li>What adjustments need to be made to the institution's enrollment reporting procedures for the new program?</li> <li>If the program is a GE program, has the institution established procedures for reporting required data about the program and students enrolled in the program to NSLDS?</li> </ul>	<ul style="list-style-type: none"> <li><i>NSLDS Enrollment Reporting Guide</i></li> <li><i>NSLDS Gainful Employment User Guide</i></li> <li>ED's <a href="#">Gainful Employment—Frequently Asked Questions</a></li> <li><i>NASFAA Policies &amp; Procedures Builder</i> module within <a href="#">NASFAA Compliance Engine</a></li> </ul>	<ul style="list-style-type: none"> <li>HEA 487(a)(3)</li> <li>34 CFR 668.16(b)(4)</li> <li>34 CFR 668.411</li> </ul>

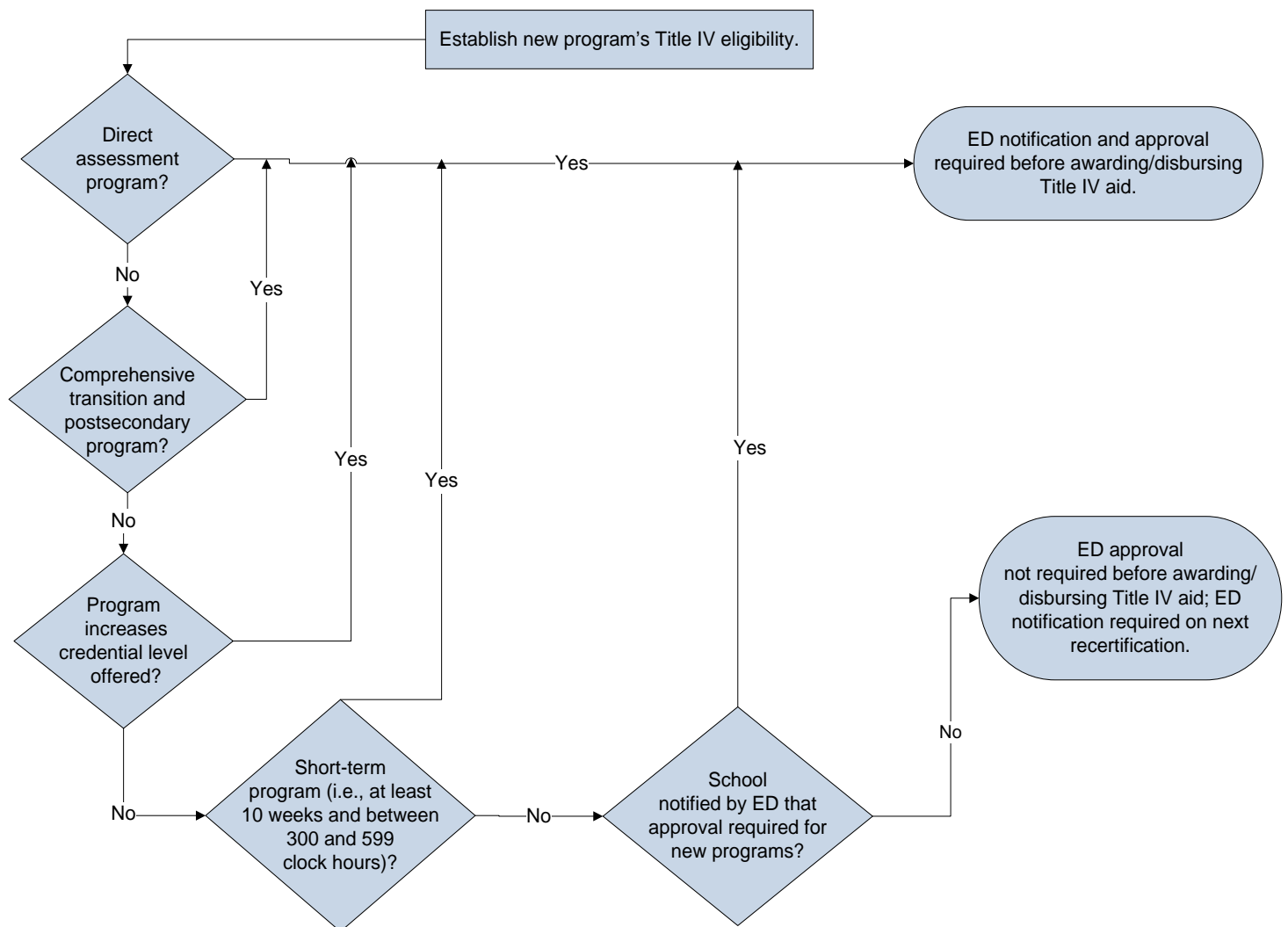
## U.S. Department of Education School Participation Divisions Contact Information

IF YOU ARE LOCATED IN...	CONTACT THE...	BY TELEPHONE...
Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, Vermont, Puerto Rico, U.S. Virgin Islands,	New York/Boston Division	(646) 428-3750 (617) 289-0133 (202) 377-3173
District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia	Philadelphia Division	(215) 656-6442 (202) 377-3173
Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina	Atlanta Division	(404) 974-9303 (202) 377-3173
Illinois, Indiana, Minnesota, Ohio, Wisconsin, Colorado, Michigan, Montana, North Dakota, South Dakota, Utah, Wyoming	Chicago/Denver Division	(312) 730-1511 (202) 377-3173
Arkansas, Louisiana, New Mexico, Oklahoma, Texas	Dallas Division	(214) 661-9490 (202) 377-3173
Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee	Kansas City Division	(816) 268-0410 (202) 377-3173
Arizona, California, Hawaii, Nevada, Pacific Islands (American Samoa, Guam, Marshall Islands, Micronesia, Northern Marianas, Palau), Alaska, Idaho, Oregon, Washington	San Francisco/Seattle Division	(415) 486-5677 (206) 615-2594 (202) 377-3173
Multi-Regional and Foreign Schools	Foreign School Participation Division	(202) 377-3168

**Note:** School Participation Division contact information is also available on ED's [Application for Approval to Participate in the Federal Student Financial Aid Programs website](#).

## New Academic Program Notification and Approval Requirements

The following flowchart illustrates when a school must notify the U.S. Department of Education (ED) and obtain ED's approval before awarding and disbursing Title IV aid to students enrolled in a new academic program. In addition to the flowchart below, ED approval of a new academic program is always required when the institution is: 1) provisionally certified; 2) subject to the "two-year" rule as a proprietary or vocational postsecondary institution; or 3) placed on the reimbursement or cash monitoring payment method. Otherwise the school is only required to notify ED about the new program on its next recertification.





## Checklist: Information Needed for Approval of a Comprehensive Transition and Postsecondary Program

The following chart lists information the school must supply with its request to the U.S. Department of Education (ED) for approval of a comprehensive transition and postsecondary (CTP) program as an eligible program. Students enrolled in CTP programs are only eligible for Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), and Federal Work-Study (FWS) funds. To request approval of a new CTP program, the school should follow the regulatory requirements of 34 CFR 668.232 and the procedures in the June 6, 2011, Electronic Announcement—Title IV Eligibility for an Institution’s Comprehensive Transition and Postsecondary Program for Students with Intellectual Disabilities. These procedures include updating the school’s Application for Approval to Participate in Federal Student Aid Programs (E-App) online at <https://eligcert.ed.gov/>.

Required Information	Comments	Notes
<b>Program Name and Classification of Instructional Programs (CIP) Code</b>	<ul style="list-style-type: none"> <li>• Provide the name of the CTP program</li> <li>• For CIP code, use Code 30.9999 (Multi-/Interdisciplinary Studies, Other)</li> </ul>	
<b>How Program Meets Definitional Components of CTP Program</b>	<p>Include a detailed description and evidence (not to exceed 30 pages) of how the program satisfies each of the following definitional components of a CTP program:</p> <ul style="list-style-type: none"> <li>• Delivered to students physically attending the school, but may include off-campus activities</li> <li>• Designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction in order to prepare for gainful employment</li> <li>• Includes an advising and curriculum structure</li> <li>• Requires students with intellectual disabilities to have at least half of their participation, as determined by the school, focus on one or more of following activities:               <ul style="list-style-type: none"> <li>➢ Taking credit-bearing courses with students without disabilities</li> <li>➢ Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit</li> <li>➢ Taking non-credit-bearing, nondegree courses with students without disabilities</li> <li>➢ Participating in internships or work-based training in settings with individuals without disabilities</li> </ul> </li> <li>• Provides students with intellectual disabilities opportunities to be socially and academically integrated with students without disabilities and, to the maximum possible extent, to participate in coursework and other activities</li> </ul> <p>Evidence may include course syllabi, catalogue descriptions, informational materials, recruitment bulletins, and assessment protocols</p>	

Required Information	Comments	Notes
<b>Satisfactory Academic Progress (SAP) Policy</b>	Provide a copy of the school's SAP policy for students enrolled in the CTP program <ul style="list-style-type: none"> <li>• May develop a separate policy for the program, but must apply that policy to all students enrolled in the program</li> <li>• Policy should be understandable to students enrolled in the program</li> </ul>	
<b>Program Length</b>	Indicate the number of weeks of instructional time and number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities	
<b>Program Outcome(s)</b>	Provide a description of the educational credential offered (e.g., degree or certificate) or identified outcome(s) established by the school for all students enrolled in the program	
<b>Accrediting Agency Notice</b>	Include a copy of the letter or notice the school sent to its accrediting agency informing it of the program <ul style="list-style-type: none"> <li>• Must include a description of:               <ul style="list-style-type: none"> <li>➤ How the program meets the definitional components of a CTP program</li> <li>➤ Program's SAP policy, length, and educational credential offered or identified outcome(s)</li> </ul> </li> </ul> Also include any information related to the CTP program that the school receives from the accrediting agency	
<b>Other Information Required by ED</b>	Provide additional information only if/when it is requested by ED	



## U.S. Department of Education

### Dear Colleague Letter

Posted Date: March 19, 2013

DCL ID: GEN-13-10

#### Summary: Applying for Title IV Eligibility for Direct Assessment (Competency-Based) Programs

**Subject: This letter provides guidance to institutions<sup>1</sup> that wish to have direct assessment (competency-based) programs considered for title IV, Higher Education Act (HEA) program eligibility. The letter outlines how institutions can have competency-based programs approved under the current regulations on direct assessment programs.**

Dear Colleague:

Over the last several years, some institutions of higher education have developed new and creative program models in which students are provided with the means to acquire the knowledge and skills at an individual pace to demonstrate achievement of specific competencies identified as necessary to complete a program and earn a degree or other credential. A majority of these program models are offered in credit or clock hours and can be accommodated under the current title IV, student financial aid regulations as non-term programs. An increasing number, however, are not offered in credit or clock hours, and many of the institutions offering such programs want them approved for participation in the title IV, HEA programs.

Section 8020 of the Higher Education Reconciliation Act of 2005 (HERA) (Pub. L. 109-171) amended the Higher Education Act of 1965, as amended (HEA), and established the eligibility of direct assessment programs to participate in the title IV, HEA programs. Specifically, the HERA provided that instructional programs that use direct assessment of student learning, or that recognize the direct assessment by others of student learning, *in lieu of measuring student learning in credit hours or clock hours*, may qualify as eligible programs if the assessment is consistent with the institution's or program's accreditation. The HERA also provided that the Secretary of Education must initially determine whether each program for which an institution proposes to use direct assessment is an eligible program.

The Department of Education (the Department) published an [interim final rule](#) implementing the HERA provisions on August 9, 2006, and subsequently published a [final rule](#) on November 1, 2006. Those final regulations, located in 34 CFR 668.10, define a "direct assessment program," outline the procedures and requirements for an institution that offers such a program to apply for the program to be determined an eligible program, and specify limitations on the use of title IV, HEA program funds. Under current regulations, the entire program must be provided by direct assessment. Those offered partially with credit or clock hours and partially via direct assessment are not eligible programs.

Generally, 34 CFR 668.10 includes the following requirements:

- Instead of using credit hours or clock hours as a measure of student learning, instructional programs may use direct assessment of student learning, or recognize the direct assessment by others of student learning. Examples of direct measures include projects, papers, examinations, presentations, performances, and portfolios.
- An institution that wishes to award Federal Student Aid (FSA) funds in a program using direct assessment must apply for approval from the Department. The application must specify the equivalent number of credit

or clock hours for a direct assessment program (including how equivalencies will be established if students are permitted to take less than the entire program based on an assessment conducted at the outset). The Secretary will use these equivalencies to determine whether the program meets the minimum requirements for an academic year and as the basis for payment period and award calculations.

- As a part of its application, the institution must explain how it determined the equivalent number of credit or clock hours for the program, i.e., its methodology for determining these equivalencies.
- An institution must demonstrate that its institutional accrediting agency has reviewed and approved its offering of the direct assessment program.
- An institution must demonstrate that its institutional accrediting agency or State licensing body has agreed with the institution's assessment of its credit or clock hour equivalencies.
- A direct assessment program may use learning resources (e.g., courses or portions of courses) that are provided by entities other than the institution providing the direct assessment program without regard to the limitations on written arrangements between an eligible institution and an ineligible institution or organization under 34 CFR 668.5(c).
- Federal Student Assistance (FSA) funds may be awarded only for learning that results from instruction provided, or overseen, by the institution. FSA funds cannot be awarded for any portion of the program based on study or mastery obtained prior to enrollment in the program, or based on tests of learning that are not associated with educational activities overseen by the institution.
- Several types of programs and coursework that might otherwise be eligible for FSA purposes are not eligible if they involve direct assessment, including:
  - Programs at foreign schools;
  - Preparatory coursework required for entry into an eligible program; and
  - Courses necessary for an elementary or secondary school teaching credential or certificate.
- Remedial coursework measured through direct assessment is not eligible for title IV, HEA program funds. However, remedial coursework offered in credit or clock hours in conjunction with a direct assessment program is eligible for FSA funds.
- If the institution plans to make changes to the program that would affect any of the information provided in its application to add a direct assessment program, it must obtain prior approval from the Department by reapplying.

It is imperative that faculty and academic officials work closely with their institution's financial aid administrators throughout the process of developing a direct assessment program and completing the application for title IV, program eligibility to ensure that all applicable aspects of title IV, program eligibility are addressed and that the program can be operationalized for title IV, HEA purposes. In addition to the criteria in 34 CFR 668.10 listed above, an institution must demonstrate that the program meets the financial aid-related components in §668.10(a). In its application, an institution must explain the method for reasonably equating the direct assessment program to credit or clock hours and related parameters of the program, including minimum weeks of instructional time, payment period, how an academic activity will take place during each week, and the definition of a full-time student. An institution should also address issues such as how it plans to measure satisfactory academic progress (SAP) for students in the direct assessment program and how or whether the financial aid system will be configured to process aid for students in the program.

For more detailed information on the eligibility requirements for a direct assessment program, please refer to the regulations at 34 CFR 668.10 and to Volume 2, Chapter 2 of the [FSA Handbook](#). In addition, the attachment to this Dear Colleague Letter contains step-by-step instructions that an institution should follow in completing the E-App to apply to have a competency-based program approved to participate in the title IV, HEA programs. While there is no prescribed, uniform competency-based education model or approach, the Department will work closely with interested institutions as they move through the approval process. We encourage institutions with competency-based program models to apply for title IV, program eligibility under the existing framework for direct assessment programs.

Competency-based approaches to education have the potential for assuring the quality and extent of learning, shortening the time to degree/certificate completion, developing stackable credentials that ease student transitions between school and work, and reducing the overall cost of education for both career-technical and degree programs. The Department plans to collaborate with both accrediting agencies and the higher education community to encourage the use of this innovative approach when appropriate, to identify the most promising practices in this arena, and to gather information to inform future policy regarding competency-based education. Currently, the direct assessment authority in the HEA is the mechanism through which title IV, HEA funds can be provided for competency-based education, and we understand that it may not adequately accommodate this educational model. The Department intends to use what we learn from participating institutions to inform future discussions regarding the reauthorization of the HEA.

For general questions about direct assessment programs, please contact Kay Gilcher by telephone at 202-219-7011 or by e-mail at [Kay.Gilcher@ed.gov](mailto:Kay.Gilcher@ed.gov).

Sincerely,

David A. Bergeron  
Acting Assistant Secretary  
for Postsecondary Education

**Attachment**

## **Application for Title IV Approval of a Direct Assessment Program**

If your institution wishes to have a direct assessment program determined to be an eligible program for title IV, HEA program purposes, you must submit an updated Electronic Application for Approval to Participate in the Title IV Federal Student Aid Programs (E-App) including the new program. The E-App can be accessed at ([www.eligcert.ed.gov](http://www.eligcert.ed.gov)). After submitting the E-App, please mail the required supporting documentation to the Department as instructed in Section M of the E-App, and submit, via e-mail, a detailed description of the program that fully addresses each of the 10 required elements outlined in 34 CFR 668.10(b) and a detailed description of financial aid administration that addresses the financial aid requirements in §668.10(a).

### **Application Process Overview**

The Department accepts applications for approval online and on a rolling basis. Institutional applications will be reviewed by the Department to ensure that the application is properly completed, to determine whether the institution has any restrictions on adding additional programs, and to evaluate whether the narrative adequately demonstrates that the program satisfies the requirements in 34 CFR 668.10. Please include the names and contact information of the institutional program contact who can answer specific questions about the direct assessment program, as the Department may need to contact the institution to ascertain or clarify information during the review of the application.

Institutions must reapply to the Department when any reported aspect of the program changes. Examples that could warrant reapplication include, but are not limited to: changes in the program's equivalence in terms of credit or clock hours, changes in how the assessments of student learning are conducted, changes in how the program is structured, and changes in the educational credential offered.

### **Application Process**

Below are step-by-step instructions that institutions must follow when completing the E-App to request title IV approval of a direct assessment program.

**In applying for approval of a direct assessment program, it is critical that you make only changes to the E-App that are relevant to the direct assessment program.** Institutions should not make any other changes, such as, for example, updating the institution's address, adding other programs, or updating accreditation information, as doing so will delay the approval process.

- **Step 1** – Access the institution's E-App at <http://www.eligcert.ed.gov/>. In Question 1, check "Other" as the reason you are submitting the application and specify in the box that the purpose is "Direct Assessment Program."
- **Step 2** – Scroll to the bottom of the page and select "Go to Section," enter "E" in the box, and click "OK/Save Data."
- **Step 3** – In Question 26, if the direct assessment program is being added at a program level not currently approved for title IV, check the box that corresponds to the type of educational program that will be offered via direct assessment.
- **Step 4** – In Question 26 between d. and e., there is a question that asks "Do you measure a student's progress in any of these degree programs by direct assessment instead of credit or clock hours?" **Check "Yes" to this question regardless of whether the program is a degree or certificate program.**
- **Step 5** – If the direct assessment program is one that must lead to gainful employment in a recognized occupation under 34 CFR 668.8, or if your institution has been instructed to provide details of other types of programs in its provisional Program Participation Agreement (PPA), then you must provide details of the program in the applicable sections of Question 27. When completing this section, you must include "Direct Assessment" in the program name field and ensure that all information provided matches the information that you will provide in your e-mailed narrative description of the direct assessment program (see below).

- **Step 6** – If the direct assessment program is not one that must lead to gainful employment in a recognized occupation under 34 CFR 668.8, and your institution has not been instructed to provide details of other types of programs in its PPA, go to the bottom of the page and select “Go to Section,” enter “K” in the box, and click “OK/Save Data.” Then, scroll to Question 69 and enter the name of the degree program being offered via direct assessment.
- **Step 7** – Scroll to the bottom of the page and select “Go to Section,” enter “L” in the box, and then click “OK/Save Data.”
- **Step 8** – In Section L, check the box indicating that “the President/CEO/Chancellor in Question 10 will sign the signature page” and then print the required signature page.
- **Step 9** – Scroll to the bottom of the page and select “Submit the Application” then click “OK/Save Data.”
- **Step 10** – The system will tell you if all required entries have been made on your application. If complete, click on “Submit Application.” If not, make any necessary corrections and then submit the application.
- **Step 11** – The system will advise you that your application has been received by the Department. It will indicate any documents that must be submitted and provide you with the address to which you should send these documents.
- **Step 12** – Mail the signed and dated signature page and other required supporting documents to the Department at the address provided in Section M.
- **Step 13** – E-mail the Detailed Program Description and the Detailed Description of Financial Aid Administration of your direct assessment program (see below) to: [CaseTeams@ed.gov](mailto:CaseTeams@ed.gov). Complete the subject line of the e-mail using the following format:  
[Name of your institution, State, and OPEID] - Documentation for Direct Assessment program application  
**Example:** XYZ University, Idaho, 00999900 - Documentation for Direct Assessment program application

### **Detailed Program Description**

The detailed description of the program, (recommended length not to exceed 20 pages), should be a succinct narrative that clearly indicates the name of the program and how the program meets each of the regulatory requirements below (the regulatory element that each part of the narrative addresses must be clearly identified). Be sure to include the name and contact information of the institutional program contact who can answer specific questions about the direct assessment program.

- (1) A description of the educational program, including the educational credential offered (degree level or certificate) and the field of study.
- (2) A description of how the assessment of student learning is done.
- (3) A description of how the direct assessment program is structured, including information about how and when the institution determines on an individual basis what each student enrolled in the program needs to learn.
- (4) A description of how the institution assists students in gaining the knowledge needed to pass the assessments.
- (5) The number of semester or quarter credit hours, or clock hours, that are equivalent to the amount of student learning being directly assessed for the certificate or degree, as required by 34 CFR 668.10(b)(3).
- (6) The methodology the institution uses to determine the number of credit or clock hours to which the program is equivalent.
- (7) The methodology the institution uses to determine the number of credit or clock hours to which the portion of a program an individual student will need to complete is equivalent.

- (8) Documentation from the institution's accrediting agency indicating that the agency has evaluated the institution's offering of the direct assessment program(s) and has included the program(s) in the institution's grant of accreditation.
- (9) Documentation from the accrediting agency or relevant state licensing body indicating agreement with the institution's claim of the direct assessment program's equivalence in terms of credit or clock hours.
- (10) Any other information the Secretary may require to determine whether to approve the institution's application.

### **Detailed Description of Financial Aid Administration**

The detailed description of financial aid administration for the program (recommended length not to exceed five pages) should explain how the program meets the requirements for administering title IV aid. Critically, because a direct assessment program does not utilize credit or clock hours as a measure of student learning, you must establish a methodology to reasonably equate the direct assessment program to credit or clock hours for the purpose of complying with applicable regulatory requirements. You must provide a factual basis for your claim that the program or portion of the program is equivalent to a specific number of credit or clock hours. In your description, please describe how you have established equivalencies for credit or clock hours. Based on that equivalency, you should also explain—

- How you determined the minimum weeks of instructional time;
- How you define the payment period;
- How you will document that an academic activity takes place on a weekly basis;
- How the student will interact with a faculty member on a regular and substantive basis; and
- How you define a full-time student.

In addition to the items above, please address how you will measure whether a student is making satisfactory academic progress in the program, and how you will determine when a student has withdrawn or changed his or her enrollment status. Please also provide evidence that your institution has considered whether your financial aid systems are configured to handle the management of a direct assessment program and whether you anticipate any challenges related to these systems. Finally, be sure to include the name of the program and the name and contact information of the financial aid contact who can answer specific questions about the direct assessment program.

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<sup>1</sup> The guidance in this Dear Colleague Letter generally applies to institutions that currently participate in the title IV, HEA programs and wish to add a direct assessment program. Institutions that are not currently participating should contact their school participation division for instructions on how to complete the application process.

## U.S. Department of Education

### Dear Colleague Letter

Posted Date: January 19, 2011

**DCL ID: GEN-11-01**

#### **Subject: Guidance Regarding Comprehensive Transition and Postsecondary (CTP) Programs for Students with Intellectual Disabilities**

Dear Accrediting Agency Executive Director:

This communication serves to make you aware of new provisions under title IV of the Higher Education Act, as amended (HEA), that affect accrediting agencies.

The Higher Education Opportunity Act, Pub. L. 110-315, added provisions to the HEA in sections 760 and 766 that enable eligible students with intellectual disabilities to receive Federal Pell Grant, Supplemental Educational Opportunity Grant, and Work-Study funds if they are enrolled in an approved program. These programs, which can be degree, certificate, nondegree, or noncertificate programs, are referred to as comprehensive transition and postsecondary (CTP) programs for students with intellectual disabilities (<http://www.gpo.gov/fdsys/pkg/PLAW-110publ315/pdf/PLAW-110publ315.pdf>).

The regulations governing the eligibility of CTP programs are in 34 CFR Part 668, Subpart O. Under those regulations, an institution that currently participates in the federal student financial aid programs under title IV of the HEA is eligible to apply to have its CTP program determined to be an eligible program for the federal student aid programs. The institution must submit an updated Electronic Application for Approval to Participate in the Title IV Federal Student Aid Programs (E-App) to the Department (34 CFR 600.20). The application must include a detailed description of the CTP program and must indicate how the program meets all of the regulatory requirements for a CTP program.

As noted below, an institution must also notify its accrediting agency of its CTP program. Accrediting agencies are not obligated to take any immediate action in response to this notification letter. However, the CTP program should be included in the self-study an institution prepares for its next comprehensive review and considered by the agency in that comprehensive review for renewal of the institution's accreditation.

The CTP program must:

- (1) (a) Be delivered to students physically attending the institution;
- (b) Be designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment;
- (c) Include an advising and curriculum structure;
- (d) Require students with intellectual disabilities to have at least one-half of their participation in the program, as determined by the institution, focus on academic components through one or more of the following activities:
  - i. Taking credit-bearing courses with students without disabilities.
  - ii. Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit.

iii. Taking non-credit-bearing, non-degree courses with students without disabilities.

iv. Participating in internships or work-based training in settings with individuals without disabilities;  
and

(e) Provide students with intellectual disabilities opportunities to participate in coursework and other activities with students without disabilities.

An institution's application for approval of its CTP program must also include:

- (2) The institution's policy for determining whether a student enrolled in the program is making satisfactory academic progress;
- (3) The number of weeks of instructional time and the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities;
- (4) A description of the educational credential offered (e.g., degree or certificate) or identified outcome or outcomes established by the institution for all students enrolled in the program;
- (5) **A copy of the letter or notice sent to the institution's accrediting agency informing the agency of its CTP program. The letter or notice must include a description of the items in paragraphs (1) through (4) of this section.**

The successful implementation of these programs will require CTP program leaders, financial aid administrators, and institutional academic officers to collaborate to ensure that the CTP program is integrated into the overall institutional policies and practices related to title IV participation and accreditation. To learn more about the CTP program and how the program aligns with other institutional programs, and, more generally, about students with intellectual disabilities in higher education, you may consider contacting institutions following the receipt of the notification letter.

In addition to implementing these changes in the title IV, HEA programs, the Department recently funded 27 five-year discretionary model demonstration grants at institutions of higher education and one national center (Coordinating Center) under the Transition Programs for Students with Intellectual Disabilities (TPSID). These projects are charged with building knowledge around CTP program components and developing CTP program standards. For more information about them, see <http://www2.ed.gov/programs/tpsid/index.html>. In the future, it is expected that the standards will guide program development and will inform program quality, and we plan to use the model demonstration network to provide support and technical assistance to institutions regarding the title IV process. We welcome your input as we build the knowledge base of CTP programs on topics related to accreditation.

We are planning a technical assistance call with accrediting agencies to provide further information regarding the CTP program. However, in the interim, if you have any questions about this work, please feel free to contact Kay Gilcher at [Kay.Gilcher@ed.gov](mailto:Kay.Gilcher@ed.gov).

Thank you for your participation in this important work.

Sincerely,

Eduardo M. Ochoa  
Assistant Secretary for  
Postsecondary Education





## Glossary for Title IV Eligibility: Adding Programs

**Accredited:** The status of public recognition that a nationally recognized accrediting agency grants to an institution or educational program that meets the agency's established requirements.

**Branch Campus:** A location of an institution that is geographically apart and independent of the main campus of the institution. The Secretary considers a location of an institution to be independent of the main campus if the location:

- Is permanent in nature;
- Offers courses in educational programs leading to a degree, certificate, or other recognized educational credential;
- Has its own faculty and administrative or supervisory organization; and
- Has its own budgetary and hiring authority.

**Classification of instructional program (CIP) code:** A taxonomy of instructional program classifications and descriptions developed by the U.S. Department of Education's National Center for Education Statistics (NCES). The CIP code for a program is six digits.

**Comprehensive transition and postsecondary program:** A degree, certificate, nondegree, or noncertificate program that:

- Is offered by a participating institution;
- Is delivered to students physically attending the institution;
- Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment;
- Includes an advising and curriculum structure;
- Requires students with intellectual disabilities to have at least one-half of their participation in the program, as determined by the institution, focus on academic components through courses or activities taken jointly with students without disabilities; and
- Provides students with intellectual disabilities opportunities to participate in coursework and other activities with students without disabilities.

**Credential level:** The level of the academic credential awarded by an institution to students who complete the program.

**Direct assessment program:** An instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program utilizing the results of the assessment.

**Educational program:** A legally authorized postsecondary program of organized instruction or study that:

- Leads to an academic, professional, or vocational degree, or certificate, or other recognized educational credential, or is a comprehensive transition and postsecondary program; and
- May, in lieu of credit hours or clock hours as a measure of student learning, utilize direct assessment of student learning, or recognize the direct assessment of student learning by others, if such assessment is consistent with the accreditation of the institution or program utilizing the results of the assessment and with the provisions of 34 CFR 668.10.

**Eligible institution:** An institution that qualifies as:

- An institution of higher education, as defined in 34 CFR 600.4;
- A proprietary institution of higher education, as defined in 34 CFR 600.5; or
- A postsecondary vocational institution, as defined in 34 CFR 600.6; and
- Meets all the other applicable provisions of 34 CFR part 600.

**Eligible program:** An educational program that is provided by a participating institution and meets the requirements in 34 CFR 668.8 for participating in the Title IV federal student aid programs.

**English as a Second Language (ESL) program:** A program or coursework designed to provide students whose native tongue is not English with speaking, reading, and writing skills in English.

**Legally authorized:** The legal status granted to an institution through a charter, license, or other written document issued by the appropriate agency or official of the state in which the institution is physically located.

**Nationally recognized accrediting agency:** An agency or association that the Secretary recognizes as a reliable authority to determine the quality of education or training offered by an institution or a program offered by an institution. The Secretary recognizes these agencies and associations under the provisions of 34 CFR part 602 and publishes a list of the recognized agencies in the *Federal Register*.

**Postbaccalaureate teacher certification program:** A postbaccalaureate teacher certification or licensure program that consists of the courses required by a state to receive a professional certification or licensing credential necessary for employment as a teacher in an elementary or secondary school in that state. The school cannot also offer a baccalaureate degree in education, and the postbaccalaureate program cannot lead to a graduate degree. The student must be enrolled half-time and pursuing an initial teacher certification or licensing credential within a state.

**Preparatory coursework:** Coursework the school has documented is necessary for the student to enroll in a Title IV-eligible program.

**Program Participation Agreement (PPA):** The agreement between the U.S. Department of Education (ED) and a school that affirms the school has been approved to participate in the Title IV federal student aid programs. A PPA conditions the initial and continued participation of an eligible institution in any federal student aid program on compliance with the all applicable regulations, and any additional conditions specified in the PPA that ED requires the institution to meet. An institution's PPA applies to each branch campus and other location of the institution that meets the applicable requirements of 34 CFR part 668 unless otherwise specified by ED.

**Secretary:** The Secretary of the U.S. Department of Education (ED) or an official or employee of ED acting for the Secretary under a delegation of authority.

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