

Comprehensive Transition and Postsecondary Programs and Title IV Federal Student Aid Eligibility

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Support for Students with Intellectual Disabilities

- Title VII – discretionary grants – Office of Postsecondary Education (OPE)
 - TPSID 84.407A
 - Coordinating Center 84.407B
 - <http://www2.ed.gov/programs/tpsid/index.html>
- Title IV – financial aid – Federal Student Aid (FSA)
 - <http://www.ifap.ed.gov/ifap/index.jsp>



Title IV Programs – Financial Aid

- HEA allows an eligible student with an intellectual disability attending an eligible comprehensive transition and postsecondary (CTP) program to receive aid from the following Title IV programs:
 - Federal Pell Grant,
 - Federal Supplemental Education Opportunity Grant, and
 - Federal Work-Study
- Implementing regulations can be found at 34 C.F.R. 668, Subpart O



Three Eligibility Pieces

Related to How Students get Financial Aid

- ❑ Student Eligibility;
- ❑ Program Eligibility & Approval; and
- ❑ Demonstrating Financial Need (FAFSA).



Student Eligibility: Title IV Waivers

- ❑ Defined in 34 C.F.R. 668.233
- ❑ Must meet all of the general, Title IV student eligibility requirements under Part 668, Subpart B, **EXCEPT** the students:
 - ❑ Are NOT required to be working toward a degree or certificate;
 - ❑ Are NOT required to have a high school diploma, GED, or have passed an ability-to-benefit test; and
 - ❑ Must maintain satisfactory academic progress under school's policy for students in the CTP Program.



Student Eligibility: Intellectual Disabilities & Documentation

- Student must also have an intellectual disability as defined in 34 CFR 668.231(b):
 - Must have a significant cognitive impairment, AND
 - Must be or have been eligible for FAPE under IDEA
- Institution determines if student meets specialized eligibility criteria (above) and must obtain substantiating documentation of both factors.



Student Eligibility: Documenting the Intellectual Disability

- Documentation requirement may be satisfied by:
 - A record from an LEA showing:
 - The student is or was eligible for special education and related services under IDEA; and
 - That the student has an intellectual disability.
 - If record from LEA does not specifically identify the intellectual disability, the institution must obtain additional documentation, such as:
 - A documented, comprehensive, and individualized evaluation and diagnosis of an intellectual disability by a psychologist or other qualified professional; or
 - A record of the disability from a local or State educational agency or government agency that identifies the intellectual disability.



Program Eligibility: Regulatory Elements of a CTP Program

- Defined in 34 C.F.R.668.231
- Must:
 - Be offered by an IHE participating in Title IV
 - Be delivered to students physically attending the IHE
 - Be designed to support students with intellectual disabilities (ID) in preparation for gainful employment
 - Include an advising and curriculum structure
 - Require students with ID to interact with non-ID students
 - One-half of participation in academic components
 - Other opportunities for inclusive coursework and activities



Program Eligibility: Generally

- ❑ Must meet the basic program eligibility requirements in 34 CFR 668.8.
- ❑ Must also meet specialized program eligibility requirements in 34 CFR 668.232:
 - Apply to the Department;
 - Meet the definition of a CTP Program;
 - Have a SAP Policy for the CTP Program;
 - Offer a credential (degree or certificate) or have identified outcomes for enrolled students;
 - Notify its accrediting agency in writing that it is offering a CTP Program; and
- Have an established program length in weeks of instructional time and credits/clock hours.



Approval Process: Departmental Approval Required

- ❑ Normally the Department does not review program curricula.
- ❑ However, accrediting agencies do not currently have capacity to approve CTP Programs.
- ❑ Until accrediting agencies can review CTP Programs, the Department will review programs.



Approval Process: General Information

- Described in detail in:
 - IFAP Electronic Announcement 2011-06-06: (General) Title IV Eligibility for an Institution's Comprehensive Transition and Postsecondary Program for Students with Intellectual Disabilities, available at:
 - <http://ifap.ed.gov/eannouncements/060611TitleIVEligInstitComprehensiveTransition.html>
- Requires program representatives and Financial Aid Administrators to work closely.
- Apply for Approval using the *Application for Approval to Participate in the Federal Student Financial Aid Programs* (E-App): www.eligcert.ed.gov.



Program Eligibility: E-App & Supporting Documentation

- Financial Aid Administrator completes E-App with input from program representative
 - Sections A, E, and L
 - (CIP code = 30.9999)
- Program representative provides the following supporting documentation (submitted via e-mail):
 - Detailed narrative description of how the CTP program meets all of the specific program eligibility requirements
 - Satisfactory academic progress policy for CTP students
 - Letter to accrediting agency



Program Eligibility: Review Process

- ❑ Internal review of general program eligibility requirements, including Satisfactory Academic Progress (SAP) Policy
- ❑ External Review of narrative description for clear explanation of how all required elements at met
 - External review by professionals with expertise in CTP – offer recommendations
- ❑ Additional information may be requested
- ❑ May take time
- ❑ Institutions can reapply if they are not initially approved



Program Eligibility: Approval Process & Helpful Hints

□ Program Description

- Use page numbers and institutional name in header.
- Ensure you address all program requirements identified in the definition at 34 C.F.R.668.231.
- Clearly identify when each requirement is being addressed by citing to the component of the regulations.
- Be explicit – provide examples.
- Include supporting materials.
- Limited to 30 pages.



Program Eligibility: Approval Process & Helpful Hints

- E-App
 - Verify correct program length is identified.
 - Include non-credit classes and internships/work-based training.
 - Even if offered in credit hours, must be rooted and reported in clock hours for Title IV purposes because not awarding a degree.



Related Issues

- Student eligibility starts with the academic term during which the approval is received, even if the term has already started.
 - The eligibility would not apply to terms or payment periods prior to that time.
- No interruption in federal aid for other students when an application to add a CTP program is submitted.



Demonstrating Financial Need: The Basics

- Apply for Title IV eligibility using the Free Application for Federal Student Aid (FAFSA): www.fafsa.ed.gov/
 - FAFSA collects student and parent financial information, determines financial need.
- Financial Need = Cost of Attendance – Expected Family Contribution – Estimated Financial Assistance.
- For more information, see *The EFC Formula 2012-2013* on IFAP at:
<http://www.ifap.ed.gov/efcformulaguide/010512EFCFormulaGuide1213.html>



Demonstrating Financial Need: Completing the FAFSA

- ❑ Student may complete the FAFSA before program approval has been given.
- ❑ For all questions, students should select the answer that best reflects their situation.
- ❑ Questions 26, 29, 30, and 94 are especially relevant to CTP Program enrollees.
 - ❑ 26 = High School Completion;
 - ❑ 29 = Grade-Level;
 - ❑ 30 = Degree or Certification Program; and
 - ❑ 94 = Number in College.



Experimental Sites

- Experiment for CTP Programs:
 - Parent PLUS Loans (experiment 7).
- Details available in Federal Register Notice published on October 27, 2011 (76 FR 66698):
<http://www.gpo.gov/fdsys/pkg/FR-2011-10-27/pdf/2011-27880.pdf>
- Two institutions participating.

Web Resources

- ❑ Student Aid on the Web:
<http://studentaid.ed.gov/eligibility/intellectual-disabilities>
- ❑ Details the basic student eligibility requirements.
- ❑ Links to the regulatory requirements for a CTP Program.
- ❑ Contains a list of approved CTP Programs.



Web Resources

□ Student Aid on the Web: Approved CTP Programs

SCHOOL, CITY, STATE	APPROVAL DATE
1. Clemson University, Clemson, SC	11/12/2010
2. University of South Carolina, Columbia, SC	11/10/2010
3. Taft College, Taft, CA	11/18/2010
4. Coastal Carolina University, Conway, SC	11/10/2010
5. The College of New Jersey, Ewing, NJ	11/22/2010
6. College of Charleston, Charleston, SC	5/18/2011
7. California State University, Fresno, CA	11/3/2011
8. Southeastern University, Lakeland, FL	11/10/2011
9. Elmhurst College, Elmhurst, IL	12/7/2011
10. New York Institute of Technology, Old Westbury, NY	11/14/2011
11. Western Carolina University, Cullowhee, NC	1/26/2012
12. George Mason University, Fairfax, VA	2/24/2012
13. Kent State University, Kent, OH	2/6/2012
14. Heartland Community College, Normal, IL	3/12/2012



Questions about your application?

Contact the School Participation Team (SPT) for your state.

Boston (CT, ME, MA, NH, RI, VT): 617-289-0133	Dallas (AR, LA, NM, OK, TX): 214-661-9490
New York (NJ, NY, PR, Virgin Islands): 646-428-3750	Kansas City (IA, KS, KY, MO, NE, TN): 816-268-0410
Philadelphia (DC, DE, MD, PA, VA, WV): 215-656-6442	Denver (CO, MI, MT, ND, SD, UT, WY)
Atlanta (AL, FL, GA, MS, NC, SC): 404-974-9303	San Francisco (AZ, CA, HI, NV, Pacific): 415-486-5677
Chicago (IL, IN, MN, OH, WI): 312-730-1511	Seattle (AK, ID, OR, WA): 206-615-2594

Also available at www.eligcert.ed.gov .

