Female: Today we're gonna talk about a general overview of the types of changes that you need to report to us, and specifically, how to deal with adding new educational programs and new locations because those are kind of complicated sometimes. And then we're going to go through a quick overview of the application process just to make sure that you're familiar with the different applications that we use and how that all works.

But before we get started, I wanted to point out a few of the basics, review a couple things with you. That being our eligibility documents. All right, so if you're not familiar with it, our eligibility documents can be found on the web at eligcert.ed.gov, and there you will find the electronic application for approval to participate in the Federal Student Aid programs, affectionately known as the E-App. And that's the application that you use to report all of the changes that we're going to talk about. And later on, Scott will actually go through some specifics about the E-App for those who aren't as familiar with it or haven't used it for a while.

Also at that website, you'll find your eligibility and certification approval report, or your ECAR. And at any point in time that you go out and look at your ECAR, you will see what the department knows about your institution, what you last reported to us about officials and directors, programs, locations, your creditor, your state approval, things, everything that you've told us that we know is gonna be sitting there on that ECAR. So you can print that out at any time, look at it, and know right away whether or not you need to update anything that's on it.

You'll also find at that website, the most recent update or acknowledgment notices that we might've sent to you. If you've added something since your last recertification, you've made a change, you'll see the notice that we sent you at that time to approve that change.

Finally, you'll be able to find there, a copy, an electronic copy of the program participation agreement that we sent you. But I really wanna encourage you not to refer back to the program participation agreement here at the website, but to the refer to the signed copy that you got the last time you went through recertification. When you send that in, you sign it, we say, "Print your PPA," and you sign it, or your president signs it, sends it to us. We countersign it and sent it back. It may have gotten lost in the president's office. But I would encourage you to go find it, get a copy of it, and keep that handy because that signed copy is your contract between the

institution and the department. And it lays out, very specifically, all the regulations and all the other special requirements we might have of your institution that we expect you to follow as a participating institution.

So anytime you have a question, "What am I supposed to do? What does my PPA say," it's nice to have that hard copy, copy of what was really signed, and you know exactly, "This is what I'm being held accountable for." Because the president's office might have the document, but it's your responsibility in the end to make sure that all of those regulations get followed.

And of course, the important part of it are the regulations. And so these are the regulations that apply to the processes that we use and the requirements that we have for updating information. You can find the Code of Federal Regulations, or CFR, on IFAP, at ifap — I-F-A-P — .ed.gov. And if you go to the IFAP webpage, and you're used to going there and looking at sort of the most recent Dear Colleagues, right? You know, check that out, and find out about training. Well, if you go to the page, and you scroll all the way down to the bottom in the lower — for you, on this side, on your — the lower right-hand corner is a link to the Code of Federal Regulations. And I would encourage you to practice using that to make sure that you have the most recent information about requirements because you can use the handbook, and we list the handbook here, Chapter 5, Volume 2, as a reference, but the regulations are the part that actually tells you specifically what is required.

And it's a good idea to be in the habit of checking out the regulations and using those as a reference as well. I do wanna point out, however, that two of the sites that are noted on here, 600.10 and 600.20, we actually aren't using the most current regulation when it comes to those, and that can be a little bit confusing. But for those who aren't aware, there was a recent lawsuit that was filed against the department, and because of that, the most recent version of those two regulations was vacated under the lawsuit. And so we're actually using the prior version from prior to July 1, 2011. So you'll wanna make sure that you have, that you're looking at the right version of those two regulations. And I will point out as we go through, there are some places where the regulations that went into effect at that time are still current and are still the ones that were being used. So, I'll try to point that out to you to make sure that you're aware of the difference between the two.

Okay, so a quick overview about reporting changes. There are two categories when you are reporting changes. There are the changes that you have to report to us and wait for our approval before you implement them. Okay? And there are also changes where you get to report them to us and go ahead and implement them and keep going. So, we call that Report and Wait, and Report and Go. Either way, if you're reporting changes, you have to do it within ten days of the change. And you would use the E-App to make the change reporting to us.

Okay, so question. Hm. When do I have to wait for approval and when can I report and go? So, Report and Wait. Let's start with the bad news first. If you are having an increase to your level of offering, then you need to report to us and wait. So for example, community colleges. A lot of our community college these days only offer up through the associate degree level, and that's what they've reported to us, and that's what they're approved for. Several states now are looking into the idea of having community colleges also offer bachelor's degrees. So that is an increase in the level of offering, going from an associate degree to bachelor's degree. It's a higher level. So before a community college that hasn't been offering them can offer a bachelor's degree, they need to have, of course, state approval, accreditor approval, and they need to report to the department, and we need to approve it.

Now, I kinda misspoke because really, you can offer it. We don't restrict from what you actually offer. But you can't give Title IV aid to it until we've approved it. So that kind of — that's an increase in level of offering. If you're a program that has just non-degree programs, and you wanna offer a degree. Same thing. It's an increase in your level of offering. You need to get our approval first.

If you're adding educational programs or you're adding locations, in some circumstances, you'll have to tell us first and wait for our approval before you add them for Title IV eligibility. Also if you have a change in ownership that results in a change in control, you need to tell us about that first and get our approval. Now, you may get a temporary PPA through that process. You know, you may be able to continue making awards throughout the process, but you have to have our approval in order to be able to do that. So if you're considering, if you're a proprietary school, a for-profit school that's considering going through a change of ownership, then you'll wanna make sure to be working with your team through that process so that you can maintain eligibility and not have to wait any longer than you need.

Okay, so the good news. The Report and Go. These changes you do need to tell us about, but you don't have to wait for our approval before you implement them. This would include a change to the name of the institution or location, a change to the address. As long as it's not a move, like more than 20, 30 miles, and that's really a move. A — but if you're just moving, you know, you're just changing down the street, that's fine. Or, you know, a small address change, as opposed to really moving the school.

Change from or to clock or credit hours or different types of credit hours. Semester programs, now you're gonna offer quarter programs. You can make those changes. Just tell us about it. A decrease in the level of your educational programs. So, you're that community college, you offered your bachelor's programs for a while, and decided this isn't gonna work. Really, you know, everybody changed their mind. Let's revert back. Just do associate degrees. You're decreasing your level of offering, let us know, but you don't have to wait.

A change to your third-party servicers. If you add a new third party servicer contract or if you eliminate a contract so that you're no longer using a third party servicer you had previously reported, you need to let us know that, as well. A lot of questions have come up about ATB. Because of the change to the ATB requirements, a lot of schools are dropping contracts with the ATB administrators. And so, there's some question about really whether they're truly a third-party servicer or not. But the fact that you have them reported on your application, you reported them in through the E-App, they're on your ECAR, we wanna go ahead and have you take them off if you're eliminating those contracts and no longer using ATB.

Of course, if you add a new educational program or a location, in some circumstances, you can just report to us and go. And finally, if you have a change to your financial aid director or your president or your CFO, you'll wanna let us know that as well. That's particularly important that we have the most current contact information, especially the e-mail addresses because all of the things that we do now, we're sending you e-mails and we're, you know, oftentimes, they'll send you interim e-mails about different things. So we wanna make sure that we always have a current e-mail address for the president and financial aid director at least. So you'll wanna let us know those as they change.

Now, it seems like we've seen a couple of these items on both, both of these lists. Got adding programs in some circumstances and adding locations in some circumstances. Why is it that some are Report and Go, some is a Report and Wait. What we're gonna do now is we're gonna talk about the different circumstances that might lead you to have to either wait or allow you to just go ahead and go.

Now when we're talking about adding programs, if you attended my session at last year's conference about adding programs, you can go home, take those notes that you took, and toss them. Yeah. I know. But save these ones. Save these ones. Refer to these ones at least for another while. We don't know how long. But we have had a change in terms of the requirements. And all of the, all of the requirements that we had about 90-day notice and notice of intent, those are the part that you can forget. Those are the notes you can throw out.

Due to a court ruling in June of 2012, those requirements were vacated, and we're no longer enforcing them. So, one of the, at the opening session, they talked about GE requirements and come to the session if you wanna hear about GE. Well, so we're here to tell you, when we talk about the GE requirements, there were sort of three pieces to those GE regulations. There was the GE Notice, okay, which was telling us about your program. So the 90-day notice, notice of intent. So we forget that.

And then there was the GE reporting, where you had to tell us about your students and whether they, whether they attended and whether they completed and how much loan they got and all that stuff. Okay, so that, you can forget that, too, 'cause we're not really doing that right now. But the third part we are doing, and that's the GE disclosures. And you still do need to follow those regulations related to GE disclosure and make sure that you're putting that stuff out on your website.

We had a session you might've attended on GE disclosures, and it's no — there's, it's not being offered today or tomorrow. But, if you have questions about it, Cynthia Hammond is right here in the front row, and she is our guru on GE disclosures. So if you missed that session and you have questions, feel free to find Cynthia either here, maybe around Ask a Fed you can catch up with her. But she can help you with GE disclosures.

So, what happened? Well, when we did the notice of intent, we have a 90-day notice. We sent out a couple electronic

announcements. Those were 5 and 16, and those were probably your bible about how to submit a new program. So you can go home and, along with your notes from last year's session, you can toss those as well. And, but I'm here to tell you that Hoff Press, as of last week on Wednesday, the 21st, the day before Thanksgiving, we have a new electronic announcement posted. It's electronic announcement number 41, and it's the requirements for adding new educational programs currently. And this is, this, I will be covering most of this during the session today, so if you wanna go back, print this, and hang onto this one as your current requirements for reporting new programs.

All right, so where does that leave us? What are we doing then? Okay, so the ECAR that we talked about before will list your eligible program levels. So remember your associate, bachelor's, master's, whatever your type of level of program is. And again, if you go beyond those levels, you do have to get our approval, and it will show on the ECAR. The ECAR will also list your eligible gainful employment programs that have been approved or acknowledged by the department. Okay, so some of these programs won't have been approved or acknowledged by the department, and we're gonna talk about that in a bit. But those that are acknowledged or approved will show up on this document.

So what do we mean by gainful employment programs? 'Cause Susan just stood up here and told you that gainful employment was sort of gone. Okay, well, the gainful employment requirements from the regulations from 2010 might be gone, but the requirement in the regulations, and 668.8 says that when you're adding a, like a non-degree program, that the program must lead to gainful employment in a recognized occupation. And that definition has not changed. Okay? How we evaluate gainful employment, well, we might not be evaluating it quite the same way. But you still, that's, definition, basic definition still stands.

So what's our focus now? One of the big focuses that we have is on the whole item, part of it of recognized occupation. Okay. So, I'm gonna talk, I'll talk about that as we go through. So, when you think of a gainful employment, think of that, rest of that in a recognized occupation. Okay.

So eligibility doesn't automatically include new programs. So in some cases, you can make a self-determination of your eligibility for a new program. And in some cases, which would be the Report and Go — and in fact, it's not really even a Report and Go. It's just sort of Go. And in some cases, the department makes the

eligibility determination, and so you must seek our approval. So it's sort of who can make a determination of eligibility. Can the school do it? Does the department have to do it?

So let's talk about that and how that process works. You can make a self-determination of eligibility under a couple circumstances, two cases. The first being if you add a program that leads to an associate, bachelor's, professional, or graduate degree, and you've already been approved to offer programs at that level, and your PPA does not require approval of the program. A-ha, you say, "Yes. Susan told me I should have a copy of my PPA. So here it is. I'm gonna use it. First time." Right? So, you wanna add a — your school says, "We're going to add this program, and we want it to be Title IV-eligible." You go, "Okay, what do I gotta do?"

First off, it leads to a degree. Okay, I'm, strike one. I got that point down. I've already been approved to offer programs at that degree level. So it's a bachelor's degree. We already have bachelor's programs. We're approved for that. I'm good on two points. Third point. Go to my PPA. Is there anything in my PPA that says I have to wait for approval? Typically, if you're fully certified, there's not gonna be anything in the PPA that says you have to wait for approval.

If you're provisionally certified, there very may well be something in there that says you have to wait for approval. There might be a growth restriction. There might be some other condition in your PPA. So that's where you wanna double-check that PPA. If you're provisionally certified, it'll say it right at the top. Program Participation Agreement, provision certification, and it'll give you the conditions later on. So if it says that right at the top, provisional certification, you wanna make sure that you don't have anything that's gonna keep you from adding a program. If you don't, then you can add that degree program, and you can make a self-determination, and you don't even have to tell us about it at this point in time. You can just say, "Administration, we're good to go. Start funding students. Everything's fine."

Another case when you can do that, make your own determination about the eligibility is if you are a fully-certified — again, not provisional because there's not gonna be any condition in your PPA — and you add a non-degree program, and that program is at least ten weeks of instructional time, either 8 semester, 12 quarter, or 600 clock hours, and — circle the and if you're doing this on your screens — it prepares a student for gainful employment in the same or related recognized occupation as a program the

department has already designated as eligible. Right. That was a mouthful. So what does that mean?

All right, you have a program. You have a 900 clock-hour program, and it's ten weeks, so that's good. Okay, and I'm fully certified. Okay, I'm fully certified, ten week program, 900 clock hours, auto mechanics. So the first thing I have to do is I know it meets all the minimums. Now, I have to go, "Auto mechanics. Is that the same or related to something I've already been approved for?" Yes, it is, because I already have a program in auto technician and auto mechanics is the same or related as auto technician, so I'm good.

Now, if my new program is culinary arts — I'm gonna add baking — and I'm bringing in stoves and refrigerators, and I'm so excited about baking. But I don't have any other culinary arts that are approved. I have auto mechanics. Uh, not very related. I hope not anyway. Okay, so that doesn't work. So I'm going with this is not in a related field, so I do have to get approval for my culinary arts because it's totally unrelated to anything I've done already. Okay? So that's pretty easy to figure out.

Now if you have any questions about the whole recognized occupation, that's defined in the regulations in 600.2. And that is one of those changes from the October 29, 2010 regs that was not vacated. So it's related to programs. It's related the whole issues of GE programs 'cause it defines what a recognized occupation is, but it's still standing, so you can still use that. And that's where it talks about SOC code, or the Standard of Occupational Classification. And those codes are the same codes that you're using when you report to IPEDS, and they're the same codes that you're reporting on your GE disclosures. Or maybe you report them to IPEDS, but you definitely report them on your GE disclosures. So you wanna make sure that whatever you're reporting there is consistent with the way that you're treating it as you report new programs and how you're looking at in terms of the recognized occupation that you're leading to.

All right, so that was the great news. You get to make your own determination. If you do that, you need to make sure you do a couple other things. First, you make sure that it's, you've got the required approvals from the state and the accreditor and that the next time you do complete your E-App at your next recertification, at least, that you report that program on your E-App. So eventually you do need to tell us about it. You just don't need to tell us about it before you start paying students.

Okay, here's the favorite bullet. However, if you make a determination that is found to be incorrect, you will be liable for any funds that you disburse to students based on that decision that you made. Oh, I know. There's a little laughter, a little sad smiles going on. Oh, no, what does that mean? That means that you can make the decision, but if you, if you're wrong, there could be a big problem.

So, what do I recommend? I recommend you go ahead and tell us about it sooner. Let's say you just went through recertification last year, and you were so excited. I'm fully certified for six years, so five more years. So I make a determination today, and I don't have to tell the department for five years. Five years later, we look at that program. We go, "You know what? That didn't meet the minimum eligibility requirements." And for five years, you've been paying students. And for five years, we say, "You should not have been paying students that money, and you have to pay it all back."

All right, so for now, you're gonna go home and for the next five years, you're not gonna sleep really well because you're gonna wonder, "Five years from now, am I gonna be in really bad trouble?" And so what's the easiest thing to do? Go ahead and send it to us. We're more than happy to take a look at it, put it on your ECAR, set your mind at ease and say, "You know what? This is fine. It's all good." Or, "It's not. We have a question about it. It doesn't look like it meets the minimums. You miscalculated something." And so we can get it fixed before you end up with five years of liability. So I just would encourage you, in the interest of everybody's mental health, to go ahead and report those as soon as you can.

So what do we do — what does that leave that has to be approved? Okay, so we've been talking about your self-determination, your ability to make your own decision. What things does the department have to decide on? The first thing would be any program that's under 600 clock hours, regardless of your eligibility, whether you're fully certified, provisionally certified, doesn't matter. Programs under 600 hours, you send it in. It's a short-term program, and we have to look at it.

If you are provisionally certified, and you're adding a GE program, and your PPA says you have to add it or have to tell us about it, then you need to tell us about it. So again, provisional

certification, check the PPA. If it says to tell us about, tell us about it. If it doesn't, then you're okay.

For a longer term, non-degree program at a fully certified school, if you're adding one of those programs in a different or unrelated program of study — so again, you're fully certified, but you're adding the culinary arts, and you've never done culinary arts before, that would have to come in for approval as well. Also, a couple specific types of programs, and I'm gonna talk more about these later, as well. The direct assessment program, if you're adding one of those, or if you're adding a comprehensive transition and postsecondary program, or CTP program, for individuals with intellectual disabilities. And these are probably programs your institution has been offering, but maybe not Title IV-eligible, and you wanna add them to your Title IV eligibility. They have some specific requirements so we do require them to be approved.

I also wanna note just a couple specific limitations that will apply to just a small number of schools, so I'm not gonna spend a lot of time on these. But if you are a new school who has not yet gone through your first recertification, and you were subject to the two year rule when you started, you typically can't add new programs unless those new programs, you had been offering them but they didn't, they weren't, you hadn't had them for two years when you first got initial approval. So they weren't initially approved, but maybe you'd only had them for a year and a half, and then, you know, six months into your participation, that program hits the two-year rule, and you've had it for two years, you can go ahead and add those with our approval. So just because you're new, if you, you know, you might be able to add some programs.

Also, if you're provisionally certified — pull out that PPA again, provisional certification — if there's a condition in there on a growth restriction, you won't be able to add new programs until you've resolved whatever it was that caused the growth restriction. So you wanna check that, look for the growth restriction, and again, work with the department to make sure that you resolve that issue before you add anything.

All right, so what happens if approval is required? The department will review the application and the materials that you submit, and we'll go over some more details about that in a second. We will evaluate your administrative and financial capability. Again, this is if approval is required. So we're gonna look at the overall picture. If you're adding, if you're adding a big program, do you

have the resources to be able to support the program that you're adding?

If it's approved, we'll send you an e-mail telling you to go out and look and print your revised ECAR and your approval letter. And then at that point that you get that approval letter, you can start disbursing funds. If it's not approved, we will send you a denial letter. Typically, we will have been working with you through the process, so it won't come as a shock to you. Rarely does anybody get any kind of disapprovals that are out of the blue that they didn't know were coming. And we'll give you an opportunity. You can always resubmit additional information. You can update the program and resubmit it with new details in order to get it approved.

If approval was not required, but you have submitted it to us anyway because you wanted to sleep well, then we will basically put you through, put it through the same process. We'll review the application, review that program, because we told you we would. And if we're gonna put it on your ECAR, we wanna be sure it's right, it's okay, it's approved. And we'll then add it to the ECAR and send you the approval letter just the same as we would if it required approval. The big difference is that we don't look at the whole administrative capability and financial responsibility piece. So we won't be looking — and we probably won't be asking near as many questions about your institution as a whole and whether you can support the new program.

You may, in these cases, go ahead and start disbursing money before you get anything from us. However, if you do, you would be liable for anything that you gave if we come back and say this program's not acceptable. It doesn't meet the minimum eligibility requirements, then you would be liable for that. So you're taking a little bit of a risk, but if you know the regulations, you've read the regulations, you understand them, then you should know if it's approvable or not before you make the decision. If it meets the minimums, then you will be fine, and we probably won't have any problem with it. So it's, again, knowing those regulations and knowing that the requirements are before you make any decision on your own.

Okay, and if it doesn't meet it, again, even if it's not required for approval, if you've sent it to us, doesn't meet the requirement, we'll let you know that. And we'll send you the letter, and you'll be given an opportunity, if you want, to go ahead and send in new information, change the program, go back to your administration

and say, "You know what? This isn't gonna be Title IV eligible, but if we add a few hours, then it will be." And the administration will thank you profusely because they want the students to be able to get aid, and so that will be really helpful for them.

All right, so everybody always thinks there's some magical formula that we have, that we do, the department makes some determination about your eligibility. But really, it's not that magical, and there's nothing in it that you can't do yourself if you know the regulations. So what is it that we look at? We look at your accreditor and state documents. We said you had to send those in. We wanna make sure that what the accreditor is saying is approved is what you put on the application. Same program names, same length. The accreditor only approves it for 900 hours, and you put on there that it's 1200 hours, uh, no. That doesn't match. So make sure that those match.

Some accreditors don't list specific programs and don't, and/or don't list specific lengths, and that's okay. We understand that about those accreditors, so you won't have that, and we won't be able to make that connection. But if your accreditor does, then it should match.

We look at the CIP code that you've listed. And again, this is the one that would be on your IPEDS, would match your IPEDS reporting. And we wanna make sure that it's consistent with what you've said about your program, that if you have a auto mechanics program you're adding, that your CIP code is for something to do with auto mechanics. It doesn't, the name of the CIP code doesn't have to match exactly the name of the program, but they have to be related. We would not be too happy to see a CIP code for culinary arts and a program name about auto mechanics. There wouldn't be a match there. So, we look for something that's, the consistency between those.

We look for that recognized occupation. So we will go out, and we will look at your GE disclosures. We'll look at what you said there about the recognized occupation. We'll look at the name of the program. We'll look at the crosswalk between the CIP code and the SOC code and make sure that there's connections between the two to confirm that yes, it's leading to recognized occupation.

We wanna make sure that it meets the minimum clock hours, credit hours, and weeks for the program length. And if it's a program that's required to do a clock-to-credit conversion, we will check the clock-to-credit conversion and make sure it's accurate. And

again, this is one of those changes that happened with the October 2010 regulations that was not vacated. So that clock-to-credit conversion, when it changed, it was 20 and 30, and it's now 25 and 37.5. So those who you have to do it know what I'm talking about. So that change did not revert back, okay? And so the whole issue of adding some outside hours and what you can add and all that, that change is in effect, and that's what we'll be looking at.

Okay, if you're adding a short-term program, something less than 600 clock hours, we want to, we check to make sure it meets the minimum completion and placement rates and that it's been in existence for at least a year. And then this one, which a lot of people look at this, and they go, "Oh, that doesn't apply to me," and that is that it does not exceed by more than 50 percent the minimum number of clock hours established by the state for training in that occupation. Now if you look at the regulations, this is specifically defined under the 668.8 regulations for short-term programs, which leads people to go, "Well, this is not a short-term program. It's a 900 clock-hour program, so I don't have to worry about that because it's not under 600 hours."

However, remember that PPA you printed? The famous, the fabulous PPA. In that, under the regulations under 668.14, it actually says that this requirement about the 50 percent in the relationship to the state requirements for the occupation applies to all programs. So any program, regardless of the program length, that has a state requirement — and cosmetology is a big one, message therapy, those kinds of areas most often are the ones that will have a state requirement. So if you offer anything like that, if you're delving into that for the first time, you wanna make sure that you know what your state requirement is and that the program length that you're paying for doesn't exceed by more than 50 percent that state requirement.

And finally, we have our two special programs, and the slide only has the one, so we'll talk about it first. And that is the CTP program. If your institution has a program where you are catering toward and working with individuals with intellectual disabilities, that program may be Title IV eligible. And we're just now starting in. We've got maybe about 20 schools that are getting into this area. And if your school has this program, I would encourage you to be the hero on campus and go back and tell your administration, "You know what? We might be able to get Title IV for these students that are enrolled in this program."

The regulatory references that — it's a section within 668, and it starts at .230, and it's the whole section — in 232, it talks about specific requirements for the program. And the whole eligibility process is different. You have to submit a whole written explanation about the program, it's satisfactory progress, how it's gonna be measured, what kind of interaction the students are gonna have with non-disabled students. But, and we put that through a special requirement review to make sure that it's meeting the requirements. But then those students can qualify for Pell. And they aren't loan-eligible, but they can get some other aid. So right now, if you're not doing that but your program has, your institution has those programs, you want to go back and look at that and see about making that an eligible program.

The same for the programs for the — what are they called? Direct assessment programs — thank you — that we think about those as competency-based programs. And you'll want to, again, look at those programs. If your institution has been offering those types of programs, they haven't been Title IV eligible because we thought that they weren't, there is a section in the regulations, and this one is 600.10, that explains the direct assessment programs, talks about the requirements, how to apply for it, and you have to do a whole additional write-up. You'll probably get lots of additional questions, but there is, it is possible for students in those kinds of programs to be Title IV eligible. And again, you go back, you tell your administration that, they'll get all excited, and who knows? You may end up with a bonus. And then you can share that with me — *[chuckles]* — for sharing this with you. But, so in the end, that's the information about adding programs, and I'm gonna turn this over to Scott.

Male: Thank you, Susan, and good morning everyone. My name is Scott Prince, and I work for the program compliance team, as well. I am an institutional improvement specialist based out of the Boston regional office, but I cover most of the Boston and New York regions. IISs work with new schools and also schools that have compliance issues. We get to do a lot of fun stuff like training, which is why I'm here today. My role is to talk a little bit about adding new locations and then just to sort of summarize the whole application process whether you're adding a program, locations, or making other changes, we're just gonna walk through it real quick so you'll understand how all that works.

So just like the ECAR lists your eligible programs, it also lists your locations that are eligible to offer Title IV aid. Just because your school is approved to offer Title IV aid doesn't mean that all the

separate locations your campus may have or extension are eligible as well. So you need to make sure that, if you're offering more than 50 percent of your program at those additional locations, that they're on the ECAR. And that's the one thing to take away. If it's 50 percent or more of your program is offered at a new location, you must notify the department.

A lot of people get confused and they think it's if they offer a class at another location that they have to add it. Well, you don't, necessarily. If you're school that offers a bachelor's degree in agriculture and there's a farm down the street where your schools take a — or your students take a class or two — as long as it's not 50 percent of their program, you don't have to add it as an additional location. However, if you were offering a special program where they were doing more than the majority of their program, more than half, then you would have to add that farm as an additional location.

So in some cases, the institution must wait for institutional approval so we'll go over that here real quick. So whether you can just report it and notify us or whether you have to wait for approval, either way, you can't disperse funds at a new location before you report it on the E-Application. And so what you're gonna do is just like if you're adding a program. You're gonna go into the E-Application, open it up, tell us that you're adding a new location and you're gonna send us copies of state authorization and something from your accreditor that acknowledges that location as well, and we'll use that in the review.

You have to wait for approval from us before dispersing aid if your institution is provisionally certified. We talked about that. You'll know that from reading your program participation agreement. You have to wait if your institution is on cash monitoring or reimbursement. You may know it as heightened cash monitoring one or heightened cash monitoring two. You have to wait for approval if you're in the process of acquiring assets of another institution or if you're subject to losing eligibility because of your default rates. In all these cases, you're required by the department to tell us about your additional location and wait 'til you get approved.

So a couple things. Susan spent some time talking about the two-year rule. Additional locations are not required to satisfy the two-year rule, which is good, unless — and there's a couple restrictions here — if the location was a facility of another institution that closed, if the applicant institution acquired either directly or

indirectly from the closed the school the assets of that location, and the institution acquired is not making payments and according with the repayments agreements in ed. In these cases, the two-year restriction applies.

But there is a way around that, however. The additional location is not required to satisfy the two-year rule if the applicant institution who acquires the additional location agrees to be liable for all improperly expended or unspent funds, to be liable for all unpaid refunds, and to abide by the policies of the closed institution when it comes to refunds of institutional charges. So if you agree to take on all that responsibility, you don't have to satisfy the two-year requirement.

Just a quick mention here about teach outs. They don't happen very often, but we wanted you to be aware of them. A teach out is basically an agreement between two institutions. When one institution closes, another institution will step in and agree to complete, help their students complete their educational programs. So a closed school may actually be eligible as an additional location of an applicant institution if they're conducting a teach out. But the teach out needs to be approved by the institution's accrediting agency, and it needs to be a school that ED has taken limitation/suspension/termination against when the school closed.

The school, the closed school location may be eligible as a permanent additional location if the, without having to satisfy the two-year requirement if the applicant institution agrees to assume liabilities or absorb the default rate — actually, let me say it one more time. The applicant, the closed school location may be eligible as a permanent additional location of the applicant institution without having to satisfy the two-year requirement, assume liabilities, or absorb the default rate of the closed school if the location was approved for conducting a teach out by the department, the two institutions are not related, and there are no common owners or managers.

So essentially, in short, the department's making it a little easier for an institution to establish a permanent location at a closed school if the school does a teach out at that school. The bottom line with teach out is there is a possibility to do that. You need to work with your regional department, regional office. So make sure you contact them as soon as you know you're thinking about doing something like this and walk through all the ramifications, and they will hold your hand through that whole process.

Susan went through what we look at for the purposes of reviewing an additional program. Here's what we look for when we're looking at an additional location. We wanna make sure that we have the appropriate state or foreign government and your accreditor approval. We wanna make sure that we have a street address for the additional location, not just a post office box. And if it's located at the site of a formerly eligible institution, we wanna make sure that it meets all the requirements to become an additional location. We wanna make sure that if it's located at the site of a currently eligible institution that the relationship between the two institutions or location, that — hang on — that the site of a current eligible location, the relationship between the two institutions, we'll make sure, we wanna look at the relationship to make sure they're not owned by the same individual.

So let's just take a second to walk through the application process. As Susan mentioned, this is the same process that you use whether you're adding a location or a program or updating your board members or your president. The first thing you do is go into the E-Application. You'll — I'll give you the website in one second — and most of the updates you need to do, you have to do within ten calendar days. One of the exceptions to that is when you go in and use the E-Application to do your recertification.

Your PPA will tell you when your current program participation agreement expires, and that could be anywhere from one year to six years after you just did it. So what happens is you wanna make sure that you know that the date your PPA expires and you're going in and doing your recertification at least 90 days before that date. If you do it at least 90 days in advance, then it doesn't matter how long it take the department and the school to go through that process. If they don't get it done by the day your PPA expires, then it will just, your eligibility will continue on a month to month basis until it gets done.

If you don't get it in within 90 days before that PPA expires, then when it expires, so does your Title IV eligibility, and you don't want that to happen. We will notify you six months before that happens, so that's one of the reasons you wanna keep your officers and contact information up to date so you get that. So for example, if your PPA is set to expire on March 30th, we'll contact you around the end of September telling you it's time to start working on your recertification, and you'll need to get that in by December 30th to meet the 90-day window.

You're gonna send us in copies of approvals for whatever change you're making and any required documentation. Don't forget to complete section L which has a signature of the appropriate person at your school. It's usually your president or your CEO.

So you go to the website, eligcert.ed.gov, and you click on starting the application, any of those questions. And the box will come up asking for a user name and password. Your user name is always the letters E-D plus your eight-digit OPEID number which we provide you, and the password is always E-D plus your nine-digit taxpayer ID number, which you get from the IRS. Doesn't matter if you use capital letters for E-D or lowercase, just make sure you do it the same way in both.

If you're a brand new institution that's just starting the process to apply for eligibility, you can go to the introduction on the eligibility page, and it will give you a questionnaire to fill out and fax in to us with some basic information about your school. We'll call you and discuss it with you, and if you meet the minimum requirements, then we'll send you an OPEID number which will allow you to go in and start the full application process to put all your programs and locations and all that good stuff.

Once you've gotten in to the application, you'll start right at the beginning in section A to select update information, and then they'll be a pick list for the purpose of the application. So make sure you tell us why you're applying 'cause that will determine the kinds of questions we're gonna ask you. If what you're doing doesn't fit into any of those, then you can just click, then you can just add other and indicate the purpose of your application to us.

Then you go through and answer all the questions. The application is smart so like the FAFSA, it'll skip to the parts that you need to complete depending on what you're trying to do. And then there's also a section in section K which has question 69 which is a blank question which allows you to go in and type in anything you wanna tell us specific about your application or your institution to where you, instead of just checking boxes, you can actually write some prose and tell us what's going on.

Once you've done all that, then you're going to make sure you click submit to send in the application. You're going to print out the signature page, section L, and make sure that it gets signed. And then what you're gonna do it you're gonna mail it in to the address that's provided in section M. It'll tell you all the things that we need, and it'll tell you where to mail it. And that's gonna

vary depending on whether it goes to your region or to D. C. It'll be customized for your school.

Some of the features of this application is that it has a lot of prepopulated questions so it's pretty intuitive. There's some help. There's some edit checks so that it won't let you submit something that's incomplete. You can also go back to the website throughout the process and check the status to see if we're working on it, to see if something's been approved or denied. But once the regional office starts working on that application, it will lock down the application so you can't go in and make any more changes.

If you forgot to do something and you want us to reopen that application, if you forgot to add somebody or you forgot some information about a program, just call up your regional office, they'll put you in touch with the institutional review specialist that's working on your application. They can unlock it, it's usually for 24 or 48 hours, so you can go in and make your changes. And then it'll lock again, and they'll be able to finish up the application.

Once all this is done and we've reviewed it, there are several folks in each regional office, they all do program reviews. Some of them review audits. Some of them work on reviewing heightened cash monitoring things. But there are certain folks that just work on eligibility, and once an eligibility analyst completes the process and it's managed by the case team, they'll e-mail you either an acknowledgement or an approval that your program has been approved or denied or whatever. And what you need to do is you need to go back into the E-Application. You'll click on the link. You can print that documentation out and keep it for your records, and that's all you need to do. You print out an updated ECAR that shows your new programs and locations, or you print out the acknowledgement letter that shows that you have a new financial aid director.

In the case of a recertification, it'll also tell you to go there and print yourself a new program participation agreement. You have to print two copies. And when you print them out, make sure you're getting all the text on all the pages. Make sure your printer doesn't cut off any information at the top of bottom of the page, otherwise, we don't have a complete contract with you, and it'll get sent back, and you gotta do it again. So just make sure you read through it carefully. You'll have your president sign it. You'll send in the two copies to us, the department will cosign it, and send it back to you. And it's the date of that co-signature, countersignature that the PPA becomes effective.

Couple common mistakes that school makes a lot is they, you can go through and save your application as you go, but when you're done, you have to click submit or we'll never get it. So once you submit the application, you'll get a receipt with the date and time that it was submitted, so then you'll know you're good to go. Don't forget to send in the signature page 'cause we can't really start reviewing the application 'til we get your signature page and copies of your state and accreditation approvals. And if you're reporting more than one change on the E-Application, make sure you indicate so in the beginning that, tell us what the change is for each purpose so we'll be sure to ask you all the questions that we need to know for all the things that you're gonna update.

And just one final comment, as I work, being in the New England region, we worked with several schools that were impacted by the recent hurricane, and what we did is we reached out to those schools to explain to them what some of their options are and find out what they were doing, if they were open or closed. And to do that, we have a list that we maintain of emergency contacts for each institution.

So if you haven't reported it in a while, you are required to give us an emergency contact person for your school. We just ask that you put that in in question 69 in that blank space. Tell us who we should contact and give us a phone number and an e-mail where we can, where we can reach them. It might be a school's e-mail if they'll have access to school facilities if it's closed, or it might be a personal e-mail or cell phone if we wouldn't, if they wouldn't have access to their work e-mail.

So with that, if you have any questions once you have finished the process, you can always contact the case manager or the eligibility analyst in each of the regions. They're there to help you. Even if you're thinking about making a change, you may wanna give us a call and talk through it before you do the application. If you have questions, we will help you. There's contact, all the contact phone numbers are here for each of the regions.

This is in contact information for Susan and I. We're gonna, we have some time for questions now, which is great. But if you wanna follow up with us, you're more than welcome to. And in addition, up in the resource center, up where they have the Ask a Fed, there's also an E-App room where you can go in, and I think it's in Bayhill 26, where you can go in and get, talk to someone about specific information about your institution. So we're happy

to take general questions here, but if you wanna know the status of a particular application or who's on your ECAR, you can go up and talk to us.

One last announcement is I think we're gonna have, we're gonna offer this session again this afternoon at around 1:30 if any of your colleagues wanna come and join us. And with that, I'm gonna turn it over to Susan.

Female: All right, I wanna, I'm gonna throw in a little bonus tidbit for you all. And that has to do with foreign gifts. Just a reminder that one of the reporting requirements has to do with foreign gifts, and that's twice a year. You're supposed to report in January and July any foreign gifts or contracts that your institution might be entered into. And those also get reported through the E-App process. So, we've been getting a lot of questions about that, and some schools finding out that they haven't been reporting them for years. So if you do have questions about foreign gifts, feel free to ask us afterward or up at the resource center, they'll be happy to help you with foreign gifts.

So, do we have any questions? Yes, go ahead. Uh-oh. There. I think the mike's on.

Audience: Okay. Yeah, I guess this is for Scott. Scott, on, when you were talking about additional locations, on slide 26, you start out by saying the institution must not disburse FSA funds at a new location before certain things. And then on slide 27 you say must wait for approval before disbursing FSA funds if the institution is provisionally certified and so on. Can I infer from that that if you don't meet the criteria on slide 27, you're not provisionally certified and so on, that you can go ahead and disburse prior to approval with an additional location?

Female: Yeah, yeah. Yes, you could, you could do that. If you, if you aren't required to wait for our approval, you can, you still need to report it, then go ahead and disburse, and we'll still do the approval process and send you the letter.

Audience: Okay, thank you.

Female: Mm-hmm. Yes?

Audience: We are offering online degree programs that we've never done before. So we currently have a graduate professional MBA

	program, but we're moving to an online MBA program. Does that require that we add that program since it's an online degree?
Female:	No. When we add programs, we do that without regard to the format of the program. So if you've already got, if you're a —
Audience:	Four-year public.
Female:	- four-year public, and you're already approved for —
Audience:	Graduate.
Female:	- master's level, then if you're adding any kind of master's, you don't have to report that, whether it's online, offline, any kind of master's, as long as you're already approved for master's.
Audience:	Perfect. Thank you.
Female:	Mm-hmm.
Audience:	Hi, we're a graduate and professional school and offer a number of professional programs as well as master's degrees. We're starting a Ph. D. program. Is that something that we would be required to get approval for prior to granting aid?
Female:	If you're already at that level — and our approval levels are master's, doctoral — so if, if you're not already approved at that level, then you would have to get the level approval.
Audience:	Okay.
Female:	At least.
Audience:	_____ _____ professional degree, that counts as doctoral, so that would be equivalent to Ph. D.
Female:	Right.
Audience:	That falls in there? Okay. Thank you.
Female:	Mm-hmm.
Audience:	Hi, if you change the address of your satellite location, do we need to get approval, or just inform you?

Female: That's just an inform. That's a Report and Go. So tell us about it, but you don't have to wait for —

Audience: Thank you.

Female: - anything. Mm-hmm.

Audience: Hi. After all the GE changes, I just wanna make sure that I understand that we only have to provide placement and completion rate information if it's less than 600 clock hours.

Female: Right. And then, and if it's a program that's less than 600 clock hours, we will check completion and placement, and typically we'll look at an audit for that information.

Audience: Okay.

Female: It's not — yeah, and then you'll put it on the — and then the application will have a place for it. But there's no other system, no other process by which you have to provide placement and completion rate.

Audience: Okay, thank you.

Female: Mm-hmm. Sounds like we're good with questions then. So, Scott and I will be here for a few minute if you wanna talk to us directly. Thank you for coming. We appreciate it, and good luck.

[Applause]

[End of Audio]