Susan Bowder: Good afternoon, and welcome to the session for schools who are planning to seek approval for a new program or a new location. My name is Susan Bowder.

Tracy Nave: And, hi, I'm Tracy Nave.

Susan Bowder: And we worked for the department's program compliance unit. One logical point before we get started, and that is we're gonna take questions at the end, so be sure to make note of your questions and we'll have microphones in the aisle ways there for you to use to ask your questions.

Okay. So today, we're going to talk about the requirements that you must follow when you want to add a new educational program, including comprehensive transition programs for postsecondary, which are for students with intellectual disabilities, and we'll also talk about the requirements for adding a new location. And, finally, we'll talk about reporting changes to programs and locations. We'll also review the process for using our electronic application for Federal Student Aid, or the E-App, to report those changes and the new programs and locations.

So let's begin by reviewing some of the basics of the eligibility process. Hopefully, this is review for most of you, but we would like to cover this for those who are new to the process. Our process for updating information or reporting locations and programs begins with the eligibility application or the E-App. Schools use this to report information that establishes their institutional and programmatic eligibility.

The PPA is the agreement between the department and the school, and outlines general and some specific requirements that institutions must follow. The ECAR, the Eligibility and Certification Approval Report, identifies specific information about schools that participate in the Title IV. All of these can be accessed via the departments website at eligcert.ed.gov. That's E-L-I-G for elegy, C-E-R-T, for certification, all one word, ed.gov. We will look at that later, so you can actually see what those screens look like and how that process works.

This slide gives you some of the main eligibility regulations which can be found using the CFR link at IFAP.ed.gov. I would encourage you to become comfortable with reading regulations if you aren't already. However, we know that some people just really get worked up about those regs, and so we have listed here FSA handbook link as well, which you can also get off of IFAP,

that's a little more user friendly and easy to use. However, we don't have an updated version yet for some of the regulatory changes, so you are gonna have to read some of the regs, or listen really closely and take good notes.

We also want to refer you to some of the gainful employment links. When you go up to IFAP in kind of the upper right side, there is a special link and they discussed it this morning at the general session about gainful employment information. And you'll find these electronic announcements there that are related to specific information about adding programs. Electronic Announcement No. 5, was sent out in June 1st and was updated on August 3rd with Electronic Announcement No. 16. So you can just go straight to 16. But if you've been using 5, you'll want to make sure that you are using 16 now. And that has specific information about the procedures for reporting new programs, some of which we'll cover today.

The next electronic announcement is number 11, and that was from June 24th, that helps you look at how to determine if a program is a gainful employment program, and we'll be talking about that lots today.

Electronic Announcement No. 12 gives guidance on degree programs when a student can earn a certificate as part of earning the degree, and we have lots of schools that have issues and concerns about that, and so we did a special electronic announcement for that particular issue.

All right. So the first topic that we're going to cover is adding new gainful employment or GE programs. And I know a lot of you, when you think "GE," I probably still get caught up thinking, "general, education," but we've moved on and used that as "gainful employment," in a financial aid world.

So just a reminder, a GE program is one that by regulation, must give the student the necessary training to become gainfully employed. Our application will actually help you identify what those programs are. There's an electronic announcement that will help you, and we'll talk about some of that today, but the E-App makes it actually really easy to know which ones are gainful employment and which ones aren't, and we'll point that out as we go through this.

As mentioned previously, the ECAR shows specific information about your schools eligibility, including its currently approved

educational programs, and in this case, it's those that have been previously reported to the department. If a school wants to provide Title IV funds to students in a program that's not listed on the ECAR eligibility doesn't automatically extend to those programs. Therefore, schools must understand when they have to notify the department about the program, and when they have to wait for approval. This has changed. If you follow that link and go to the Federal Student Aid handbook, you're gonna find information from pre-October 29th regulations and pre-July 1 implementation that's gonna talk about different times when it was okay for a school to make a self-determination about program eligibility. And that information has changed, and so this we're gonna cover today is when can you make that self-determination now.

So, basically, that is for programs at public and private, nonprofit institutions, so those of you who aren't at public or private nonprofit, you don't have to listen this page. Those programs that lead to – oh, sorry. The programs that lead to a degree are not gainful employment or GE program, so notification is not required for your degree programs at a public or private nonprofit. Of course, if you are adding a degree program, and it's at an increased level, so if you've only had bachelor's degrees and now you're adding master's degrees, you would have to report that increased level of offering, but you wouldn't have to get approval for the program itself.

Okay. So now for all schools, so this is for everybody, notification is not required if the program has the same CIP code and the same credential level, and is one that's already offered and the accreditor doesn't consider the program to be an additional program. In that case, you would simply report the program on the next recertification application or the next time that you're updating and just wanna add it so that your ECAR is up to date.

Okay. So when we're talking about required notification, except as previously noted, when you're not required to notify, everything else that you're adding that's new – that's a new program – you needed to tell us by July 1st if the first day of class was between July 1st and October 1st, 2011. So those ones that's already happened and hopefully you were on top of this and you knew and you told us about it. For those where the first day of class is on or after October 1st, you would have to notify us at least 90 days prior to the first day of class.

Okay. Because this is new, there are a couple scenarios I want to cover that aren't covered on a slide. If you have a program that

you added before July 1st, where you made a correct self-determination under the old requirements about when you could add a program and just tell us – back, again, to the FSA handbook – and now you need to report it to us so that we can report it on the ECAR. That's not considered a new program as long as part of that process of your self-determination was that you also started paying students. In that case, you would need to indicate in Question 69 on the application when you actually started the program, and when you started paying students. The point being that you could come in and say, "Well, we decided in June to add the program, but we didn't get around to paying anybody until October." Well, it's not really new then before June – or July 1st. It's really new in October. Because when we talk about new, we're really looking at when did you add it to your Title IV eligible list.

So, therefore, for programs that started before July 1, but you didn't actually start paying the students with Title IV until after July 1, then you would treat them as new programs. So let me give you an example. You have a program that you have in place because some employer had said, "We would love to have this program offered," and so you've been offering a program and mostly the students are coming from that employer and they employer's been paying their tuitions, it hasn't been Title IV eligible. It hasn't been a big deal, so it's been going on for maybe five years and you've been offering this program without Title IV.

Then the employer decided that they can't reimburse for all their people anymore, and so you looked around. You did your research. You figured out, "Well, you know what? There's still a market for this program. There's still a need in the community for people to have this education, and so we want to continue this program." But now that students aren't being paid through their employer, we wanna go ahead and add it as an eligible Title IV program. So there you've been having this program for a period of time, but it hasn't been Title IV-eligible.

So if you decide to add it to your list and you start paying people and everything starts happening before July 1, then it's not a new program, because you self-determined and it was okay. However, if you decide that after July 1, then it is considered a new program for Title IV purposes, even though you say, "But I've had it for five years." Okay. So it's really when did it become a Title IV-eligible program.

So when is notification received? We consider it received when

we get a materially complete application with all of the required information, documents, and approvals that you have to submit as part of that process. That's also reiterated and discussed in Dear Colleague Letter GEN 11 10, which is another good reference piece for you.

As part of the application process then, the school goes into their electronic application and adds the information about the GE program details. They send us the accrediting agency approval. You send us the state approval. You send us a Notice of Intent to offer an educational program, and you send us the Section L with the signature. So, really, if you look at that list, that's the same thing you've been doing every time you've added a program, except for one piece, and that is the Notice if Intent.

So when we're talking about adding GE program, the other stuff hasn't changed. If it's not a GE program or you've previously had it in place, the only difference between a new GE program and another program that you're reporting to us, is whether or not you provide the Notice of Intent. Everything else is essentially the same.

So our focus today, therefore, is going to be on that Notice of Intent because that's the difference in the process and that's the thing that has most people concerned and worried. So what does that need to have in it? It must describe how the institution determine the need for the program, how the program was designed to meet market needs, any wage analysis that was conducted, how the program was reviewed by or approved by or developed in conjunction with business advisory councils, program integrity boards, regulatory agencies, or businesses that would likely employ graduates of the program, the first day of class, and the date that you're requesting to begin Title IV disbursements to students. And, again, that gets back to helping us know, even if the first day of the class was five years ago, you're looking for Title IV to start maybe in December. Okay.

So I'm gonna talk a little more about the details of that because that sounds pretty straightforward and probably the easiest way to do it and make sure you meet the requirements is to just go point by point and address each point. The clearer you are, the easier it is for us, the more likely it is that we won't ask you questions.

Now we've looked at lots of these over the last several months, and I mean a lot, so you and your colleagues have been doing a great job sending things in. And we've learned a lot along the

way, so I hope to pass on some of our tips and points for making sure that your application, your Notice of Intent is complete so that we can move the process along and not have to come back and ask you more questions.

But first off, you wanna make sure that you describe the process. We want to know what did you do. We aren't trying to second-guess your decisions. That's not our role. But we want to know that you've followed a process, and that you made a thoughtful decision about adding this program and educating students in this area so that they could get their money.

Now I know you're in financial aid, and this isn't your process, and this isn't your issue to decide to add programs or not add programs. You're at the mercy of the officials at your institution, the people in academics, the president, whoever is making those decisions on your campus. But unfortunately, you're the ones who are stuck with making sure that what comes to us is right. So once again, like so many times, financial aid is caught in the middle. And we're sorry, but that's something that we're looking to you to help educate the people on your campus to make sure that what they provide to you so that you can provide to us is complete and accurate.

So make sure that they are describing the process that they used. They need two processes. How did they determine the need, and how did they develop the program content? Okay. So an example, one that we've heard frequently is a group of businesses came and asked us for this. They said, "We needs people who are trained in a particular area." So that would be, "How did you become aware of the need? What was the process?" Well, a lot of times it comes to you. It comes to the school. The school doesn't go out and look for it, and sometimes the school does. So whatever that process was.

Then the school surveyed whatever they did. In this case, they surveyed employers in the area to find out what kind of training the students would need to have in order to be employed in that field. So it could be survey. They could have brought together an interest group. They could have done a number of different things. But what process did they go through to find out how they should develop the curriculum?

Then they need to describe the process that was used to evaluate the two and how they meshed. So how does that content meet the need? So pretty straightforward. The businesses want it. We

surveyed them. We figured it out. We developed a program. We gave it back to them, and they said, "Yeah, this is right." Okay? So it's a process.

So then we want to see that some external parties were involved. Obviously, in my example, there were external businesses involved. That's not always the case. We have seen things come in where it's, well, the professor thought this was a good idea and so he talked to a committee of other professors and they decided that, "Hey, this would be great and we should do this." But where's the external? How did the professors know? They probably had talked to somebody, but we aren't mind readers and we can't assume that they did, if it's not written on the paper. So make sure that they're explaining how did they go out or they came up with this great idea. Who did they bounce it off of? How did they confirm that this would really lead to a place where students could get jobs in the end?

And finally, at least for this slide, there's lots more actually, you want to be sure to include complete details in the narrative. Don't attached a lot of stuff with it. We don't want committee meeting minutes. We don't want other documents that were there. And, in fact, don't let your university or college submit documents that were prepared for some other purpose. Please tell them to take the time and prepare documents for us. Sometimes there are things buried in those documents that you don't want us to see. We have read some things that were like, "Really? Why on earth would they send this to the department? I can't believe they didn't proof this better." Because they took something that they had prepared for an internal committee or something even for their accreditor and they sent it to us, and it wasn't addressing our issues at all, and it had stuff in it that was just crazy. So don't send us anything you don't want us to read.

Make sure that the information is specific to the program that you're adding. It should be in the past tense, right? So don't say, "We survey employers." That's a procedure. Say, "We surveyed, this person, this person, and this person, and we got this information back." So be specific and be current. Be current to the process of the program that you're adding."

Finally, if you have a program that's currently taught at your institution, one that you've had for the five years and you're just adding for Title IV, or maybe it's one that you've had and you're changing it significantly enough that it's considered a new program by your accreditor, so you have to report it, that's great.

That's actually really helpful because you can say, "We've had this kind of placement in this program. The students like it, employers like it. But we're updating it to add these programs for this reason." So, again, what was the process? How did you get to where you're changing that program? So it's perfectly fine. It's great to be able to say – in fact, better for your case to say, "We have some history and we know that we can get jobs for students in this area."

The main thing is to focus on the benefit to students and employers, and make a clear connection between the program, the job that it prepares the student for, and local, regional, or national market need for employees in that job. Remember, we want you to get students, and we care that you care if there's a market for marketing your program. But that's not our issue here. That's not the market we're talking about, 'cause we've gotten documents that have said, "Well, we're not sure if the students would get jobs, but we think we can get students to come and take the program."

It's like, "Okay. I don't think they meant to send that to the department." So that's nice. We're glad. We hope you do well. But we care about whether the students are gonna get jobs, so focus on that market. Okay. So recall that if you must notify us, you may or may not need to wait for approval, all right? So this is sort of like that notify us and continue on or you make your self-determination, whichever.

There are certain times that you have to wait or approval. If the institution did not provide the required notice by July 1 for those programs that started between July 1 and October 1, then you should have waited or our approval before disbursing funds to students enrolled in that program. So I'm trusting you all did that. So let's see some head nods. Yeah, okay, good. If it's a bobble I understand that, too. You'll wanna get that information in if you haven't.

You must wait for approval before disbursing funds if the institution did not wait at least 90 days, or doesn't wait 90 days – not wait, but tell us 90 days in advance before disbursing funds to students in a program. So, again, you've gotta give us that 90-day notification. Otherwise, if you come in 60 days in advance with when you want to start it, then you just have to hope that we can get it done in 60 days, and we might, but we might not. In which case then you wouldn't be able to give aid to students right away.

You can still start the program. So let's be clear about that, too.

You're turning it in today. You say, "I want to star this January 5th," or whatever it is, that's not 90 days in advance. So you can still start your program on January 5th, but you can't tell students that they're going to get financial aid, because you don't know, because we haven't approved it. And so you submit the information. We'll do it as quickly as we can do them, which with the Notice of Intent, it's taking us a little longer. And as soon as we get it done, we'll notify you that it's okay, and at that point, you can begin paying students. It would be up to you if you wanted to wait and not start it until you heard for sure, or if you wanted to go ahead and start it, not knowing for sure whether it would be approved or not. The big point is you can't tell students that it's gonna be okay until you know for sure.

Approval is required if a materially complete application is submitted 90 days in advance regardless of the reason. Okay? So we were talking about you have to do it in 90 days. It doesn't matter why you didn't. If you say, "Well, it's now and I'm submitting it for the 5th of January, and I didn't do it because the academic folks didn't give it to me," Oh, well. Okay. We can't do anything with that, or, "We couldn't get our accreditors' approval in time." We can't do anything with that either. So it doesn't matter the reason. It still has to be in.

Now we know, again, that you're caught in the middle, but the more that you can do to help your academic offices understand the deadlines, the better it's gonna be for you in the long run because you're the ones who have to answer the questions to the students when they come in saying, "Where's my financial aid? Can't I get financial aid?" So it's in your best interest to get these things approved timely and get them through the process.

Here's another reason why we can't wait. Some schools have come and they say, "Well, my application is locked. I've already submitted an eligibility application to update my officials and now my application is locked because the department is reviewing it, so I can't report the new programs. That's not an acceptable reason for not making the 90 days, either. You can always call the team, your school participation team, and ask them to open the update access for your application so that you can go ahead and get that program reported and meet that 90-day requirement. So don't let the fact that the application is locked and already under review for something else be a reason not to meet the required deadline.

Okay. And there was a few other cases where approval is required, and that would be for schools that are provisionally certified. You

always have to get approval for new program. If the institution's adding a direct assessment program, or if the institution is adding one of those comprehensive transition and postsecondary or CTP programs for students with intellectual disabilities.

Now this is the last criteria, finally. If the last time that we have is if the department tells you you have to wait. So this is the point, you've done it 90 days in advance. You think, "Okay. I'm good to go." But you're still on pins and needles for your first 60 days until you're 30 days out. And by 30 days before the start of your program, if you haven't heard from us, you're good to go. You can go ahead and consider it an eligible program. You will still hear from us eventually, but you're okay. If we're going to tell you, "Wait a minute, we have a concern," we will do that at least 30 days prior to the start of your program, at which point in time, we would say, "You need to wait for approval before disbursing Title IV funds to students in the program." So that really truly is your last criteria for when you have to wait for approval.

So what happens if approval is required? Well, the department will evaluate the new program, and if it's approved, we will send you an approval letter and a revised ECAR, a link to get the revised ECAR off the website, and you may disburse funds after receiving that approval letter. If it's not approved, you will get a denial letter. It will explain the reason for the denial, and you'll be given an opportunity to request reconsideration. And I can tell you, we don't do that many of those, so rest assured that if you can get through the process, and you have had a process, like I said, our isn't to try to second-guess what you're doing. It's to make sure that you're doing something.

In the event that you don't meet a criteria that requires approval, then ED will just – we will just take a look at the program, do a review, as opposed to the same kind of evaluation that we do otherwise, and we will go ahead and add the program to your ECAR and you will still get a written notice and you will get an updated ECAR. But if you didn't have to wait for approval, then you would be able to disburse funds prior to receiving that approval. Again, this would be if you go 30 days and you didn't hear from us, 30 days before. Of course, if you weren't required to provide notification at all, then we don't know about the prom and you're not gonna hear anything from us, so that's kind of an easy case, if you can be lucky enough to do that.

In all cases, then, again, if a program doesn't meet eligibility requirements then we will deny eligibility. And the institution will

be liable for any funds that were paid to students in the program by the time that we are able to tell you that it didn't meet the basic elementary requirements. So it doesn't hurt to wait for us to give you that notification and get that notice in hand. It will be for things like basic eligibility, if it's not long enough or if it doesn't lead to gainful employment, if it has some issue with the eligibility of it, then you would be liable for anything that you paid. But if you know what the requirements are and you follow those requirements, you should be fine.

Now I mentioned that the department will evaluate programs that require approval, and that will include checking to be sure that the accreditor and state approval matches the E-App, that we're looking at the name of the program and the length of the program. So make sure that your accreditor knows what you're doing and you're putting the same numbers on the application. That the CIP code that you choose, the Classification and Instructional Program code, is consistent with the type of program that you're offering. So you don't wanna have a CIP code for a nursing program and the name of the program is Model Mechanics.

That would be an extreme example, but you wanna make sure that those are consistent, that you meet the minimum weeks and clock and credit hours, that it leans to gainful employment, which means there's at least one standard occupational classification code, or SOC code related to that CIP code and that it meets the clock to credit conversion where it's required. And if you have questions about clock to credit conversion, this isn't the session for you, but you might wanna go to Session 35 and listen to clock to credit conversion. That will be a good one.

Notification, then we'll look at the notification to make sure it includes sufficient details as we discussed previously. So if you know your Notice of Intent has all those pieces and covers all that information, then that's what we'll be looking for. And for short-term programs that don't require an associate degree, we make sure that they have been in existence for a year and meet the completion and placement rates.

We make sure that your program doesn't exceed by more than 50 percent the minimum number of clock hours established by the state for training, or for licensing in that particular field, if you have a field that requires licensing. And for the CTP programs, we wanna make sure that you meet the special requirements for that. We're gonna take a couple minutes and talk about the CTP programs.

There are some special requirements and approval is required in all cases for those CTP programs. For those of you who aren't familiar with this provision the Higher Education Act allows eligible students with an intellectual disability who are attending an eligible CTP program to receive Pell grant, FSEOG, and work-study. And for any of you who are in the earlier session on the gainful employment regulations – or, actually, I think it was in the general session where they were talking about the experimental sites, we heard from Jeff Baker that there's an experiment that they're going to consider allowing PLUS loans for the parents of students with intellectual disabilities. So if you have those programs on your campus, I would encourage you to get together and with your program area, the office, and see about making this an eligible program.

You can find complete details in the regulations at 34 CFR 668 sub part O. So, again go out to IFAP. Look for sub part O in the regulations, and it's very specific about what needs to happen with that program. So to cover that briefly, to be an eligible CTP program, the program must be offered by an institution of higher education that's already participating in Title IV. It must be delivered to students who are physically attending the institution, and it must be designed to support students with intellectual disabilities in preparation for gainful employment.

It must include advising and curriculum structure, and it must require students to participate in courses and activities with students without disabilities. So what are the special requirements for CTP in order to apply for eligibility? They're described in detail. An electronic announcement 2010-06-21 and in 668.232 of the regulations. They require the program representative and the financial aid administrator to work really closely on the application, which is made using the E-App as well. The E-App is completed by the financial aid director, and, of course, you'll need input from the program folks about the length of the prom.

And supplemental information would then be prepared by the program office. They would provide, again, a detailed narrative. But this one's slightly different from the Notice of Intent. So don't give them those requirements and tell 'em, "Write it up this way," 'cause this one has some different pieces to it. You wanna give them the actual regulations and tell them they need to address each of the specifics. They need to say how it meets all of the specific program eligibility requirements.

They need to provide a copy of satisfactory progress policy that have for CTP students, and that is not the same as the regular satisfactory progress policy, and it does not mean to include quantitative and qualitative measurements. So we're very used to SAP has to have qualitative and quantitative, and we look at their CTP program's SAP policies and go, "Wait a minute. Where's the qualitative? Where's the quantitative?" and it drives us crazy because that's how engrained. But their policies are very different from everything else, and that's okay. So don't get hung up and don't send it back to them and tell them to fix it.

And then they have to send us the letter that they've sent to the accrediting agency about the program. Accreditors aren't approving these programs, but we do have to show that we've notified them about the program. So then the – when it comes to us, we have an internal review where we look at the application and the satisfactory progress policy. However, the narrative is sent out to a field reviewer who are experts in concept and work out in the field and can truly evaluate the programs to see if they meet our requirements. So those aren't employees look at them. Those are people who really understand what these programs are supposed to designed to do.

To ensure that it's complete, make sure that everyone of the program requirements is addressed. Kinda tick down the list., clearly identify when each requirement is being addressed in the narrative. Again, it's one, two, three is great because it really says, "This requirement and here's how we meet it. This requirement, here's how we meet it." Be explicit and provide examples. And in this case, again, use documents that are prepared for CTP and for us, not for somebody else, because we don't want to read that other stuff.

Use page numbers and headers so that we don't mix 'em up and get 'em lost or the contractors don't, our field reviewers. And unlike the Notice of Intent, you can't supply supporting materials. So it's okay to put meeting minutes or separate documents in that separate policy statement or lists of courses, whatever. That's okay. To add for those. You can put as much stuff as you need to in there.

For you all, when you're completing the application, be sure that the program length is correct. They have a tendency to think in one-year increments, and so we've seen inevitable of these come in where they say, "The length of the program is one year's worth of clock hours," when it's really a four-year program. So make sure

you take the whole program. And they can include non-credit classes and internship or work-based training.

So there's one other special population of schools that we want to address when it comes to adding new programs, and that is new schools who are still in their initial period of eligibility, and of that subset, those that were required to meet the two-year rule before they were approved. And for those schools, ED will not approve new programs unless the institution can demonstrate that it has been offered for at least two years. So if you've only been in six months and you had to wait two years to get in, but you had one program that didn't quite meet the two years when you started, when it does meet the two years, we'll add it, but we won't add anything else where it hasn't been around. It's to allow you to not have to wait another six months before you get your initial approval.

Otherwise, in all cases, for those schools, you cannot award Title IV funds to students in unapproved programs, so you have to wait for approval. So now it's on to Tracy to finish up.

Tracy Nave: Thank you, Susan. Susan was kind enough to provide us with everything you've ever wanted to know about GE program and that also includes notifications and approvals. During the remainder of the presentation, we're going to talk about reporting locations to the department, and also providing the department with updates for programs and locations, and then we'll also finish up with the application process. And then we'll have time for questions at the end of the presentation.

Okay. So as Susan mentioned, the ECAR that the department sends you will list the programs that are eligible at your institution. Similarly the ECAR will also list the locations that are eligible at your institution. So your institutional eligibility does not necessarily extend to any separate locations or extensions.

If you want to add a location to your ECAR, you have to notify the department. And here, we're talking about locations where you want to offer and educational program that you're offering at 50 percent or more of the program. So if you're offering less than 50 percent or more of a program, you do not need to notify us. If you are getting close to that 50 percent mark, you might wanna report it to us just to be safe.

Okay. So in some cases, you'll have to wait for ED approval. In other cases, you can just report that change to us and then go on

with your business.

Okay. So schools must not disburse FSA program funds to students at additional locations until they notify the department. And that consists of the institution reporting that change, via the E-App, and also submitting supporting documentation from your state authorizing agency, and also your accrediting agency. So once you have reported an accredited and licensed location to the department, and unless you're a school that is required to wait for our approval, which I'll talk about in just a second, you can actually disburse Title IV funds to students enrolled at those locations.

Okay. So if a school meets one or more of the following criteria, it must wait for approval for disbursing Title IV funds to students that are taking a program at an additional location. And, again, we're talking about 50 percent or more of a program here. So you must wait for our approval if you are provisionally certified, if you are on cash monitoring or reimbursement. If you have acquired the assets of a school that has closed or has ceased to provide educational programs during the preceding year and that school also participated in the Federal Student Aid programs during that year, you must wait for our approval.

Also, if your school would be subject to a loss of eligibility after the cohort default rate regulations you must wait for our approval, and in addition, if you are otherwise notified by the department to wait.

Okay. Susan just talked about the two-year rule. So for purposes of qualifying as an eligible location, an additional location is not required to satisfy this two-year requirement unless the location was a facility of another school that has closed or ceased to provide educational programs for a reason other than a normal vacation period or a natural disaster that directly affected the school or its students, or if the applicant school acquire either directly from the closed school or through an intermediary, the assets of that location, and if the school from which the applicant school acquired the assets of the location is not making payments in accordance with the repayment agreement with the Department of Education. Okay. So those were the reasons why you would have to wait for our approval.

However, and additional location is not required to wait for our approval for the aforementioned categories if the applicant school agrees to be liable for any improperly expended or unspent FSA

funds at that closed school location, to be liable for any unpaid refunds owed to students who received Title IV funds at that closed school location, and to abide by the policy of the school that has closed or ceased to provide educational programs regarding refunds of institutional charges to students, and that would be in effect before the date of acquisition of assets to students who were actually enrolled before that date.

Okay. Moving on to teach-outs and this was put into the law back in 1998 – sorry, 2008, August 2008. So what is a teach-out. A teach-out is basically an agreement between two schools that provides an equitable treatment of students and a reasonable opportunity for students enrolled at the closed school to finish their program. And that is for all enrolled students. Okay? So a location of a closed school is eligible as an additional location for another school for the purpose of conducting teach-out if its accrediting agency has approved the teach-out, and if ED has taken a limitation, suspension, termination, or emergency against the school.

Okay. So a school that conducts a teach-out may establish a permanent additional location at the closed school without having to satisfy the additional requirements a location, and that would be they wouldn't have to satisfy the two-year requirement. They wouldn't have to absorb the default rates of the closed school or assume any of liabilities, if the location was approved for purposes of conducting a teach-out and it would be approved by an accrediting agency. Also, if the institutions are not related parties, and there are no common owners or managers. So in short, the department makes it a little bit easier for schools to establish a permanent location if they conduct a teach-out at a closed school.

Okay. So what does ED look at when we're evaluating your additional locations? Well, we make sure that you have the appropriate state, and if you are a foreign school, we make sure you have the appropriate foreign government approval, also accrediting approval. We make sure that you actually provide a street address with your additional location. We just don't want a PO Box. We'll also look to see if it is located at the site of a formerly eligible location, and if that site meets all the eligibility requirements of an additional location. It will also look to see if your additional location is at the site of a currently eligible institution, and we'll look at the relationship between those two institutions.

Okay. Moving along, we're gonna talk about reporting program

and location updates. Okay. And this is just for programs and locations. Okay. So there are two categories. The first category is when an institution must notify the department and wait for the department to approve the change before it disburses Title IV funds to students in a new program or at a new location. The second category is when an institution must notify the department via the E-App within ten days, but it does not need to wait for our approval before disbursing Title IV funds to students in new programs or locations.

Okay. All right. So institutions must wait for our approval if they want to increase the level of education programs beyond the scope of their current approval. So, for instance, let's say you're approved at the associate's degree level at your school and you wanna start offering a bachelor's degree. You need to wait for our approval for that. Naturally, you'd needs to submit that. You'd notify us via the E-App within ten days and submit us the appropriate accrediting agency and state documentation.

Okay. So, again, you'll need to submit the change via the E-App within ten calendar days. You'll need to submit copies of the approval for change also within ten days. You'll need to submit any required documentation, and that would be if you're adding a program, for instance, it would be the intent to offer an educational program. And, also Section L of the E-App, which lists the appropriate signature of the appropriate person, and that's basically your CEO or your president. So when you submit all that information to us, it's known as a materially complete application.

Okay. Some changes. These are known as acknowledgement actions, but we're talking about approval actions. In some cases you don't have to wait for our approval, but it's actually still considered an approval action. These are actually acknowledgement actions. So with these, you do not have to wait for our approval. But, again, you must submit the appropriate documentation to us.

Okay. So if you change from or to clock hours, or credit hours, it's' considered acknowledgement action. Naturally, you will have submit this via the E-App with the appropriate documentation.

Also, if you change the name of the institution, of course, you don't need to wait for our approval on that. You can just change the name of your institution, but you need to report it to us, and we would also need documentation for your accrediting agency and your state agency.

Okay. Also, if you change the address of your principle location, that's just considered an acknowledgement action, but please keep in mind if the change in address is more than 20 miles or more than 30 miles commuting distance and it's located in a different state, we actually will look at that and determine if it's actually just a change in address or if you are actually closing and then reopening a new school. So just keep that in mind.

Also, if you make a name change or an address change for your other locations, it's just an acknowledgement action, but please keep in mind those distance rules that I just mentioned apply.

Some other actions that are just acknowledgement actions but you are required to submit to us would be if you change your institution's third-party servicer. Also, corrections to your CIP codes, they are also considered to be acknowledgement actions, but they do need to be reported to us. And, also, if you are reporting an end date for one of your GE programs they are acknowledgement actions, but they must be reported to us.

Okay. So we have talked about the required notification and approvals for programs, locations. We've talked about reporting the updates to the department. Now we're gonna finish up with the application process. And some of you might be very familiar with this, but some of you are probably unfamiliar with this. So bear with me if you are familiar with this. Okay.

How do you submit the changes? Okay. You would use our website, eligcert.ed.gov to submit any changes. In Section A, Question 1, you will select the update information box, and then you'll get a pick list, and you'll be able to pick from that list what the purpose of your application is. And you can pick more than one. If you do not find the purpose of what you wanna do in that pick list, you would just click on the Other, and type in the purpose. In all cases, you'll need to complete the appropriate section of the application and then you'll also need to send in Section L, which is the signature page. And then you will mail Section L and the supporting documents to the Department of Education, and that address is provided the E-App. Also, the supporting documents that you will need to also submit will be in Section M of the E-App.

Okay. There are some feature of the E-App. We have pre-populated questions. We have a lot of drop-down lists, which makes your life easier. We also have help text. So anywhere in

the application, you can actually ask for help. We have edit checks. If you forget to complete a certain section of the application – let's say you were adding a location and you didn't put the ZIP Code in or an address in, they application will let you know that you missed something. Also, it will provide you with status messages. For instance, it will tell you if your application has actually been submitted.

And then there's skip logic. So the system will actually skip to the next applicable question in the application. So let's say you wanted to change your financial aid administrator, which is Section A, and then you wanted to add a location, which is Section F. As long as you indicate both of those purposes, it'll take you right to Section A, then it'll jump right to Section F after you've completed that and so on and so on. So it doesn't make you go through every single section of the application.

Did I do them all? Yeah, okay.

All right. So here is the homepage of our application, our eligibility application. On the upper left-hand corner, you can see a link. It's in purple and it's circled, and it says E-App. That's a link that'll take you right to our sign-in screen for the eligibility application. Also, in the middle of the page that's also in purple, you'll see Application for Approval to Participate, and so on and so on. And that's also a link right into our system.

On the left-hand side of the page, you'll see an number of options. You can check the status of your application. So you can go in there after you've submitted an appliance. You can click on that and it'll tell if the case team has opened it up yet for review. It'll also tell you if you didn't actually submit the application.

You can display your application. So let's say you're working in your application and you have to go to lunch or go somewhere else, you can save your information and then come back to it later and so you can pick up right where you left off.

And you can also display your PPA and your ECAR. So this would be good let's say you're a new financial aid administrator and you're at a school that has a ton of additional locations and you don't know if they were all reported. Someone might have forgot to do it down the line there. So you wanna make sure that all of your locations are eligible. You can go in there and actually make sure that all of the locations that you're offering financial aid at have been approved by the department.

Middle part of the screen there, you'll see the participation team contact information, and that gives you the contact information for your school, so certain case teams are obviously in charge of different states. Okay.

Here is a sign-in screen. Your username is an ED and your eight-digit OPEID number, and your password is an ED and your nine-digit taxpayer identification number. It's case sensitive. So if you use a capital ED for the username, you have to use it for the password.

Okay. Here's that pick list that I was talking about. You can pick more than one. If you are making a number of changes, please make sure you pick all of the purposes, because if you don't, what's gonna happen is someone from the school participation team is gonna call you and say, "Hey, you missed a purpose," and you are technically the one who has to indicate that in the application. So they'll call you and they'll have to open up the application for you because like Susan mentioned, it actually locks after you submit it. So you just wanna make sure that you pick all the purposes.

If, however, say you submit the application and you realize, "Oh, I forgot to submit a change in my CFO." You can just call your school participation team. It's not a huge deal, and have 'em open up the application for you. It stays open for five days for you. And they can open it and you can just make the change to your current application.

Okay. Again, the application has skip logic. I will cause the application to display the appropriate application sections. And you can review and update information as appropriate. Again, you can save it at any point in time and just go back in and start up where you left off.

Please note that if you're adding a new GE program, you wanna refer to gainful employment Electronic Announcement No. 16 for specific instructions, and that basically tells you, "Go to Update Application." It tells you to pick non-degree program, complete Section E of the E-App. And then it also tells you that you need to input certain text into Section K, Question 69. It just tells you to say, "This application includes notification of new gainful employment premium," and so on and so on. That's what Question 69 is for this.

This is a screenshot of Question 69. Sort of a narrative. In addition to putting information in there for GE program, you can also clarify other information in your application in this box.

Okay. All right. So like I said, the E-App will automatically default to the next applicable section for you. This is actually an example of an additional location 'cause you can see down in the bottom, under, "Where do you wanna go?" it says, "Return to Section F." So I know Section F is additional locations. So hare, let's say you've completed everything, you can actually go back to Section F if you wanna add another location, or it'll automatically bring you to Section L.

And here is Section L. It's a signature page. You'll wanna make sure that that box is checked where the green thing is pointing to. And that will indicate that the person who is signing it is, indeed, the same person that you have listed as the CEO of president in Section A. And then you'll print this, and have your president sign Section L.

Okay. So when you go down to the bottom, it'll default to "Continue to Section M." So this is one of the last steps before you actually submit the application. So this will bring you to Section M. So this page right here gives us a lot of information. Section M lists all the documents that you need to submit to us for it to be considered a materially complete application. As you can see on this screen, you have to submit your accrediting agency information, your state agency information, and Section L of the E-App. And then up in the upper left-hand corner, you'll see that it tells you that your application has not yet been submitted. And this is actually an example of proprietary school's additional location application because they're asking for Social Security numbers and proprietary owners must provide their Social Security numbers.

Okay. So you see the link down at the bottom there, Application Signature Page? Just clicking on that link does not submit your application. It actually brings you to yet another page. And here is the page that you actually are submitting your application on. A lot of people stop before they get here. So this message will indicate if entries are still needed. And then if everything is all set, you'll basically click on Submit the Application, and then you'll get this receipt page right here. And when you get this receipt page, it'll also provide you with the address that you need to send that supporting documentation to.

Okay. All right. So if you wanna check the status of your E-App, if you wanna know if the case team opened it up, if we received it, anything like that, you'll go to the left-hand side of that home screen that I showed you, and you can just click on Application Status, and it'll tell you what's going on with your application.

Once we approve the application – hopefully, we'll approve the application – we will send you an e-mail indicating that, and in the e-mail, we will tell you to go to the PPA ECAR page of the E-App website which I just showed you. It was on the left-hand side of the page for that homepage there. And you'll be able to view your approval letter. So what you'll wanna do is you wanna review and approve your approval letter, and ECAR to make sure that we got the correct change, obviously. And if that's correct, that's great. Then you keep that for your records.

You don't need to return anything to the department. If it's a recertification or a change in ownership or initial application, we'll send you an e-mail that tells you to print two pages of your PPA. You'll have to have the president sign both of them. You'll send them back into us. We'll countersign both of them and send you back one. So that's just a little bit different of a process. These are just approval updates and acknowledgement updates, so you don't need to send anything back to us. But you probably should keep them with your records 'cause a lotta times auditors, they'll wanna know when a certain additional location, for instance, became eligible. And if you have that there, it's obviously much more helpful.

And there'll also be an e-mail provided in that notice that we send you. So if you have any questions or if you need to change anything, obviously, you can just call us.

We ask that you avoid common mistakes. And one of the most common mistakes that schools actually forget to hit the Submit button. They stop right before that Submit application page, so we do hope that you do hit Submit. A lotta times we get school calling us saying, "Where's my application?" We don't have it.

Also, don't forget to send in your signature page and the appropriate accrediting agency and state approval notices. And if you're reporting more than one update, please indicate each update so we don't have to call and open up the application again, 'cause all that does is delay the application and you could have students waiting for Title IV money.

All right. Okay. Just a couple more slides here, and we'll get to our questions.

This is just contact information for all the school participation teams in charge of your school. And here's some contact information for Susan and myself. Susan takes questions 24 hours a day *[laughs]*. I have her cell phone number – no, I'm only kidding. Anyway, okay.

Okay. So we have covered the required approval and notifications for a new program. Look for a locations. How to report those changes to us, and also the application process. So if you have any questions, please use the mike so we can capture them on the audio portion of this or other people.

Susan Bowder: Actually, I see Tracy's on the east coast in New York, and I'm on the west coast in Seattle. So the between the two of us, and everybody else in budget _____ questions.

[Crosstalk]

Tracy Nave: Yeah, exactly.

Audience: Hello.

Tracy Nave: Hi.

Audience: My name is Paul Perry from Education Compliance Management. We're a third-party servicer. You had mentioned the example of a school with the program that they've been teaching for five years, and now you're considering it a new program because the financial aid is being disbursed after July 1st or October 1st of 2011. But I don't see that anywhere. Was that in a Dear Colleague or the regulation? Because the big concern was the first day of class is being on or before July 1st of 2011.

Susan Bowder: Right, actually in that Dear College GEN 1110, it talks about adding a program to your Title IV eligible program list, and that's where it is. That's where you find it, because just because you've had a program for a number of years, if it hasn't been Title IV eligible from our perspective, it's a new program. So I would go back to that Dear Colleague. And it's I think in the first paragraph of that Dear Colleague letter.

Audience: Okay. And a follow-up question. If let's say the school submitted an application for a program and they're just notifying it prior to

| | the recertification application process, but they'd just like to put it on the ECAR and they did not follow the new program instructions, would you notify them to say that, "This is a new program, and you failed to give us the Notice of Intent"? |

Susan Bowder: Absolutely. If a school submit an application and it appears to us that it needs a Notice of Intent, we'll follow up and we'll obtain whatever information we need to confirm that, and then we'll let them know that they need to provide that Notice of Intent.

Audience: Thank you.

Susan Bowder: Mm-hmm. When you're talking about changing these programs and adding programs, and not waiting till recertification, a lot of schools are finding that with the gainful employment reporting they want to clean up the programs that are listed on their application because the letters went out to presidents saying, "IT looks like you have GE programs, but yet you didn't do any GE reporting." And come to find out that, well, they had a program ten years ago, but they haven't been offering it.

Nobody's been getting Title IV, but it's still sitting here on the ECAR, and so we're saying, "Wait a minute. You have it. You should be doing it." And so a lot of schools are going in and doing that end dating to put an end date for their program to update it and get it off the ECAR so they don't have to report about it deal with it. And also updating the CIP codes to make sure that what we're using is actually correct and consistent with what's being reported in other areas.

Audience: Hi, good afternoon. Thanks for your presentation. My name's Tim O'Neal. I'm with Shamrocks Unlimited. We are a third-party servicer in California. I have a question going back to Page 2 of your session that talked about what you'll be covering.

When you say "changes and updates to programs," are you referring to a school that might take a GE program, let's say it's 19 semester credits and they're gonna increase it by 3. So it's not a substantial change, either by their accrediting agency or the state. Does that have to go through and acknowledgement to you, or an actual application?

Susan Bowder: Right. Well, okay. So if your adjusting the program, you would wanna let us know. But whether it's considered a new program or not depends on the type of change that's being made. So if it's not a substantial change and not considered a new program by the

accreditor and it's still the same CIP code. It's still the same program level, so you're still a one-year program. It's still a one-year certificate, whatever, or it's still an associate degree, then those are not new programs. That's merely an update or a change, and so you would still have to tell us. You still report it. But you don't need that Notice of Intent. And that's the big key difference is whether or not you need that Notice of Intent. And on that kind of a change, you wouldn't. You just need to be careful. A lot of times schools will make changes that really are substantial and it's not really the same program anymore, in which case it is new.

Audience: When you say "notify you," are you talking about the ECAR, or are you just talking about a letter with maybe the documents from the –

Susan Bowder: The E-App and the ECAR, yeah.

Audience: Okay.

Susan Bowder: All of our notifications come through this.

Audience: Okay. Thank you.

Susan Bowder: Mm-hmm.

Audience: I'm Steve Dill with Link to Educational Services. And I've got a couple questions regarding the application process, notification of intent. In your example, you said that if we sent an application today for a January 5th start class, that we could go ahead and start that, and then subsequent to that, let's say in March, we got a letter from you that says, "Yes, you're an eligible program." At what point in time does the eligibility for the student begin? Is that going to be retroactive to January 5th, or does that begin at the point in time that we get your approval?

Susan Bowder: Well, the eligibility begins when the approval happens, but you can pay students for that payment period when it becomes eligible. So –

Audience: Okay. So the general eligibility rules would apply.

Susan Bowder: Yeah, those general eligibility rules still apply. Correct.

Audience: The second question, it was Slide 28 and 29, we were discussing where no approval was necessary.

Susan Bowder:	Mm-hmm.
Audience:	And the third bullet point on 28 said that the institution may disburse funds. On Slide 29, the last bullet point, though, you made it clear that if after you've disbursed those funds, the department comes to us and says, "Hey, this not an eligible program," the institution's going to be liable. So I'm a bit confused. I'm easily confused, but I am a bit confused as to rather we can actually disburse the funds without notification, or if – and I know the department in all good intent tries to get it to us before that would happen, but I'm confused.
Tracy Nave:	No, know exactly where you're coming from, Steve. If you provide us with notification 90 days prior to the first day of your class, okay, and then you don't hear from yourself and your are not one of the schools that are required to wait, okay, so you're not provisionally certified or anything like that, if you don't hear from us, if we don't tell you you can't disburse funds, you can disburse funds. But if we come back a month later, a month after school started and we say, "Hey, you know what? We're just getting around to looking at it now. We're finding some issues with it," you have to stop awarding Title IV right then, but you're not liable for any the funds you disbursed, unless your program does not meet the requirement so 668.8, so the basic eligibility requirements. So that's the only time we would hold you liable. Is that –?
Audience:	Okay. So the first disbursed would be then considered eligible, if subsequent to those disbursements being made we had done everything properly. We were an eligible program, and 120 days in, you said, "Hey, no. We changed our mind. We decided that this is not eligible." Those first disbursements would be all right. The institution would not be liable for _____.
	[Crosstalk]
Tracy Nave:	We wouldn't come back and say, "No, the program's not eligible." We'd day that, "No, you need a little work on your intent to offer an educational program." If the program's not eligible, it's not eligible, and you're liable for that. So it doesn't meet those minimum requirements in 668.8, you're liable. You're not understanding me.
Audience:	Okay. So it's my understanding then that if it's an eligible program, we submit 90 days prior, we don't hear anything from you, we could be begin disbursing on Day 1.

Tracy Nave:	Yes.
Audience:	Do you envision at any point in time when the department would go, "Oops, this fell off my desk and, in fact, we don't consider this a proper program"?
Susan Bowder:	If you –
Tracy Nave:	If the program is not eligible, right – we're not determining if your program – we'll determine if your program is eligible. But if you're submitting information to us with the intent and all that stuff, okay, if your program doesn't meet 668.8, the minimum requirements in length, then it's not eligible and you would be liable for the funds.
Audience:	Okay. So it's really just clearing up the Notice of Intent.
Tracy Nave:	That's basically what it is, exactly. So if we come back after you've disbursed money, right? It's 30 days after you started doing that, and we come back and say, "You know what? Your intent to offer an educational program's really not up to snuff. We need some more work on it," you need to stop at that point, but you're not liable for any money, okay?
Audience:	Thank you very much.
Tracy Nave:	Yep. Is that clear? Yeah, okay.
Audience:	Hi. My name's Bill Cakish. I'm with West Coast University, and we are a degree-granting school. And as a result, we have no programs on our ECAR. We're now adding a program, so we've been instructed to add all of the programs that we have. Do we need to provide copies of the state and accrediting agency approvals on those?
Tracy Nave:	Yes.
Audience:	Okay. And so we'll have to give you the complete history 'cause some of those programs are very old and the credits have changed, so we'll have to give you the whole history of the changes and the credits for those programs. Okay.
Tracy Nave:	These are programs that you just wanna start offering Title IV for the first time?

Audience:	No. We have offered them for years.
Tracy Nave:	Oh, yeah.
	[Crosstalk]
Audience:	Yeah.
Susan Bowder:	A proprietary school, degree program.
Audience:	Right. Exactly.
Tracy Nave:	Yes.
Audience:	Okay. Then the second question is, we're acquiring a building that was a former school. The school has been taught out. There are no students at all. It's an empty building. We're acquiring that. Do we have to swear for all liabilities or make any promises with that or can we just ask to add it as an additional location?
Tracy Nave:	It wasn't a school before?
Audience:	It was a school before.
Tracy Nave:	It's closed and gone. Yeah. How long has it been –
Audience:	It's closed. Yes, recently. But there are no students left.
Tracy Nave:	Well, your case team will actually look into that because if there were –
	[Crosstalk]
Audience:	– case team.
Tracy Nave:	– liabilities that were sort of left over and weren't paid, then you would have to assume those liabilities. But they'll look at that and they'll be able to tell you, and if that's not the case, then it's fine. You can add the location.
Audience:	Okay. It was an unrelated school, no _____ l
	[Crosstalk]
Tracy Nave:	Right, right.

Audience:	Okay. Thanks.
Tracy Nave:	Yep.
Audience:	Hello. I'm Ena Holwith, International Education Corporation. I have a question regarding new school and the two-year rule. If I have new school that is Title IV aid-eligible and has gone two years, and they were approved initially for the one program and two years and two days after. We're now two years into it. I wanted to add additional programs, and follow all of the gainful employment requirements, can I do it at that point in time, or do I have to run those programs for two years with no Title IV aid during that period?
Tracy Nave:	Yeah. Are you in your initial certification period?
Audience:	Well, we're looking at acquiring. It's a brand new school.
Tracy Nave:	Oh, it is a brand new school. Okay.
Audience:	It's a brand new Title IV aid school with one program.
Tracy Nave:	Okay.
Audience:	All right? So if we were to look at it, and at the end of two years, we wanted to go ahead and offer programs that we do at our other locations, at this new OPID location, can I do that? Because we have acquired a school previously that had Title IV aid that had one program, and upon acquisition, we were able to add programs, but now under the new two-year rule.
Tracy Nave:	Okay. The two-year rule applies to new institutions, okay? So, again, a new institutions has to have a program that meets our minimum requirements, actually. It has to have offered that program continuously for two years prior to its date of initial application for Federal Student Aid.
Audience:	Right.
Tracy Nave:	So if they're in their provisional first year initial period, usually they can't add any programs.
Audience:	Right. And we wouldn't wanna do that.
Tracy Nave:	You don't wanna do that. So if you're talking about –

Audience:	We don't wanna add any programs until after –
	[Crosstalk]
Tracy Nave:	Two years, later they'll definitely be out of their initial period, and so you could add then.
Audience:	Perfect. Thank you.
Tracy Nave:	Yep.
Audience:	Hi. My name is – sorry. I'm too short. My name is Rosa Shaw. I'm with American Health Institution. Can you hear me?
Tracy Nave:	Yes.
Audience:	Okay. And I have a question. On the same connotation that the previous lady was talking about, I do have a Title IV school that is right now on provisional. Gonna get off provisional in July. When it goes off provisional, as I understood, we were supposed to add on all the other programs that we're hold on because they had not met the two-year provisional before. As that still stands, would I apply for when I apply for the school? Like I have to apply 90 days ahead of time to be able to get before July 1st to be able to get approval? Do I apply right then and there for all those programs and any other, maybe another branch that we may have? I do not know. I need to know whether the 90-day rules applies to this provisional that is finishing up in July 1st.
Tracy Nave:	So you just completed your provisional person.
Audience:	I'm gonna be completing in July 1st.
Tracy Nave:	Next July 1st.
Audience:	Yes.
Tracy Nave:	Okay. So 90 days before that you can actually reapply for recertification, okay? You'll actually get an e-mail from us. And you'll want to submit it 90 days before, okay, and within that notification what you do is we want your new programs. So that'll be your 90-day notice to us.
Audience:	And now when July 1st comes in, these programs have been running because I'm being approved. I've been running those programs for whatever years, six months. Will those students

	coming in July 1st, would I be able to apply Title IV to them from July 1st on, or is it retroactive or it's not?
Tracy Nave:	If you get eligibility, if you receive elementary during a payment period, you can pay Pell back to the beginning of the payment period, and you can pay loans back to the beginning of the actually the academic year.
Audience:	So I will be able to do it as _____ terms, 'cause we do it by terms.
Tracy Nave:	So, yes.
Audience:	I will be able to.
Tracy Nave:	Yes.
Audience:	Okay. Backtrack it all a little bit if we need to. Okay. Thank you.
Tracy Nave:	Yes. And it's the date that we approve it. Not as of July 1st. So even if you submit it 90 days before and we're looking at your application, let's say that you didn't submit something you were supposed to or if we don't approve it until August 1st, that's the date you have to use for approval.
Audience:	But on that term that I'm in, if –
	[Crosstalk]
Tracy Nave:	You can pay, yes.
Audience:	– I'd be able to backtrack it to.
Tracy Nave:	Yes.
Audience:	And the same thing with the new school if I do decide of adding on a branch, would that be okay, also?
Tracy Nave:	I didn't hear that last part.
Audience:	Okay. Let's say that I have a branch. I have right now a branch that I'm working on, okay? And I need to know whether I have to wait – I have to apply, also, prior to July 1st 90 days before, or do I have to wait until July 1st apply for the new branch, and then going in the 90 days from there on.
Tracy Nave:	I can't really hear her. I can't hear her.

Susan Bowder:	On the location approvals, there isn't a 90-day requirement for location approvals. However, if it's submitted on the same application, we approve that all at once. We don't piecemeal approve. So we wouldn't say, "Okay. Your program is okay now," or, "Your location's okay now, so you can go ahead and pay that," and then a month later, "Well, now your programs are okay," and then a month, "Now your application is approved." It all will happen at the same time. So if you put those locations on that application, they're not gonna become eligible until we actually approve that application.
Audience:	Okay. Okay. So as of July 1st, it would be approved if I put it in overpayment days before, or whenever it is that I put it in.
Susan Bowder:	Yeah. I would just do it 90 days ahead of – whenever your current PPA is set to expire, make sure you get your application in 90 days before that, and put everything on it, and then when everything gets approved, you'll have that approval date.
Audience:	Okay. You also mentioned that through provisional, if I had somebody that was – I had one program that was disapproved because I had two months of lapse in between the two years, and that was held on and disapproved. You also mentioned that if that was the case, I could apply to it if that two-year period came in before my provisional coming up?
Susan Bowder:	Right. If a program hits its two years during your initial approval date, or period, you can apply for it. We didn't want to disadvantage schools by saying, "Oh, well, I've got this program and it hits two years now, but my other one doesn't hit two years for another five months," and make them have to wait five months, so we do allow you to come in with that one when it hits two years, you can apply for it.
Audience:	I tried to do one like that, and I never got an answer from the Department of Education. So I have no follow up on it. I tried to do it. I did talk to my rep. I did talk to them. They unlock the app. I went and changed it. And I called 'em up several times. I never got an answer from it.
Susan Bowder:	Why don't you stop up at the E-App table on the third floor, and they can check into it for you. We can't do anything with the details.
Audience:	Yeah, it still says disapprove on it _____.

Susan Bowder:	Yeah.
Audience:	Okay. Well, thank you very much for your answers.
Susan Bowder:	Mm-hmm.
Audience:	Hello. I have a quick question. We're a for-profit law school. We've been approved. We'll be seeking the final approval to add a location, which will be 30 plus miles from our current facility. I understand that it's not adding a program, because the CIP code would be the same; however, with the ten-day rule applied, if everything is all gonna be the same, the only difference is we're just adding a new location, are we still required to report that we're actually adding a new location?
Tracy Nave:	You're adding a location, right? You're not moving.
Audience:	Right. The credential of the CIP would be the same. It would be the ID would be the same. We have the approval from the ABA for the new facility.
	[Crosstalk]
Tracy Nave:	You just notify us within ten days to –
Audience:	– I provide a Letter of Intent or would it be like via E-App just of the new program location?
Susan Bowder:	Let me just clarify. So you have a location and you offer a program.
Audience:	Correct.
Susan Bowder:	And you're going to add another location and have the same program.
Audience:	The identical program, just a separate facility.
Susan Bowder:	We look at programs for the institution as a whole. So that's not a new program. You don't have to report anything about the program because you're not adding a program, you're just going to teach it at some additional location. So all you have to do like Tracy said is just add the location. There's no Notice of Intent. There's no CIP code information. It's just go to the Section F for the location and just report the location.

Audience:	So ten days prior to the start the program, so that's more like a report and go in ten days prior we're good?
Tracy Nave:	You're fully certified?
Audience:	100 percent.
Tracy Nave:	Yeah. Just do that. And you need to send your accrediting agency and your state documentation.
Audience:	And that's good.
Tracy Nave:	Yep.
Audience:	And only ten days prior to the start of the program.
Susan Bowder:	Well, as soon as you know, it's nice to do it, I mean, get it to us.
Audience:	The earlier, the better. Okay. Gotcha. Thank you.
Audience:	Hi, ladies. We're going through a process of changing location of our main campus. We moving to where our additional location is, and then moving the additional location to where the main campus is.
Tracy Nave:	A re-designation, you're doing.
Audience:	Yeah. On the accreditation level, it's a change of location. When we do the E-App, it's just a change of address?
Tracy Nave:	It'll be a re-designation, and I think you can hit on that.
Susan Bowder:	Sorry. I was –
Tracy Nave:	You want the main location to be at the additional location, and vice versa, right?
Audience:	Yeah. We're actually, physically moving the main campus, the programs to the address where the additional location is. And because of our accreditor doesn't allow us to house two, both the main and the additional at the same address, we also have to move the additional location out. Physically move the student and everything. When we do the E-App, it's a change of address?

Tracy Nave:	It's re-designation. So what you wanna do is call your case team. You don't wanna do that, there are a lot of money flow issues that will come up during that. So call your case team first –
Audience:	Does need prior approval, re-designation of a main campus?
Tracy Nave:	It will, yes.
Audience:	Not just notification. Okay. Thanks.
Audience:	Hello. I have a school in Texas and it's still within the two-year rule, which expires in July 15th of 2012. Our lease has expired already, about a year, and we're there month to month and I know I cannot add a second location, which is not our interest now. But am I able to just move a mile down the road just change address, that's all I'm wanting to do? Or do I have to wait until July 15th?
Tracy Nave:	Yeah, they can do that. It's a change in address.
Audience:	That's all. I'm not –
	[Crosstalk]
Tracy Nave:	Yes.
Audience:	Thank you.
Susan Bowder:	And we've actually been told we're at the end of our time, so if you still have a question, you're welcome to come up and talk with us but we appreciate those of you who have stayed and I hope that you found the information helpful. And if you missed something, ask us. Stop by the E-App table up on the third floor and they can help you out with individual issues, or we have this session a couple more times, so you're welcome to come back. Thank you.
	[Applause]