

# Financial Aid & Curriculum

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2018 ASCCC CURRICULUM INSTITUTE



# Description & Outcomes

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Description: Many curriculum committees are unaware of the implications that curricular changes may have for financial aid, including unit totals, awarding of certificate, financial aid requirements, and the like. This session will cover the major areas of financial aid that can be impacted by curriculum, and discuss ways to ensure that students have access to the aid that they need to continue their educations.

## Outcomes:

1. An understanding of potential problems which may affect FA eligibility for the student and the institution;
2. How to identify and address inconsistencies at the local level;
3. An understanding of how CCCCO and local processes assure program eligibility for FA;, including Clock Hours;
4. An overview of requirements specific to Distance Education, Correspondence and FA eligibility.

# Implications: Financial Aid & Curriculum Processes

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# 2016-17 Financial Aid Facts

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FA recipients account for 60+% of all Credit FTES in the System

Units collected vs Units waived ratio 1:2

FA not college operating revenue: pass through directly to eligible students for non-institutional costs

- FA Recipients = 1 million
- FA Dollars = \$2.8 billion
- Average FA award = \$2,800
- Largest recipients = Fee Waivers 987 thousand
- Largest Program Dollars = Pell \$1.5 billion

Critical resources for recruitment and retention persistence and success

# What Is at Stake?

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Non-compliance could result in:

- Audit finding(s), including--
  - Reconstruction required for up to 5 years prior to audit finding
  - Repayment required for ineligible program payments in federal and State Cal Grant Program
- Suspension/limitations/termination for Federal Title IV participation

# Curriculum Design Objectives (Overview)

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The design and development of new programs/courses should require sufficient research, and should be data-driven. Research to consider includes--

- Higher education transfer opportunities (including Associate Degrees for Transfer, UC Pathways, other major-specific articulation)
- Sustainable industry employment opportunities (CTE)
- Local/regional labor market demands including employer needs and student preferences (CTE)

# Course/Program Approval FTES Implications

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## Conditions Affecting State Apportionment (§ 58050)

- Only FTES that meets statutory and regulatory apportionment conditions may be claimed for state apportionment.
- Attendance for apportionments shall not be reported unless the course is in an educational program that has been **approved** or the course itself was **approved**.

## Questions:

- Natalie Wagner, Fiscal Standards & Accountability [nwagner@cccco.edu](mailto:nwagner@cccco.edu) or (916) 327-1554

# Program Approvals

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Federal regulations require that academic programs eligible for federal student financial aid be approved by the appointed State Authorizing Agency, if the state requires approval.

- The Chancellor's Office requires approval of all programs of 18 units or greater.
- The Chancellor's Office can approve programs fewer than 18 units, but also permits local approval.



# Enviro Scan in CCC Segment (2016)

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As of 2016, the Department of Education [ED] now verifies state eligible program approval:

- **At the time of recertification; or**
- **When changes are made to eligible program(s) during the academic year.**

Any deviation from what the college submits for federal approval and what the Chancellor's Office reflects in the COCI may be cause for concern.

Current Practice:  
Keep Programs in Sync  
and COMPLIANT

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# Inconsistencies & Corrective Actions

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1. Colleges are offering programs that do not appear in COCI.
  - Why?
    - Possible import problem when the CI system was migrated in 2010
    - Possible import problem when the CI system migrated to COCI in 2017
    - The CI system had a correction feature and some colleges made updates that changed historical records, therefore impacting the alignment of information.
  - How to Solve?
    - College's should postpone payment of federal aid to students enrolled in those programs until:
      - Program are submitted and approved through the COCI.
      - **Recertify program eligibility with ED.**

# Inconsistencies & Corrective Actions (cont.)

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2. Colleges are offering programs with program titles, TOP codes, and/or unit values which differ as recorded in COCI versus college catalog and/or the PPA.
  - Submit these programs as sub or non-sub changes to the Chancellor's Office for approval.
  - Reconcile changes with catalog and Program Participation Agreement (PPA)
3. Inactive programs for which students still have catalog rights should be listed on the documentation sent to ED.
  - Working with ED on how to flag these programs as inactive.

# Reconcile Control/Source Documents

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Chancellor's Office Curriculum Inventory (COCI)

College Catalog

Approved program listing in school-based software

Title IV Program Participation Agreement (PPA)

Local governing board approvals

Local Curriculum Committee meeting minutes

# Outcomes of Local Curricular Processes Assure Compliance

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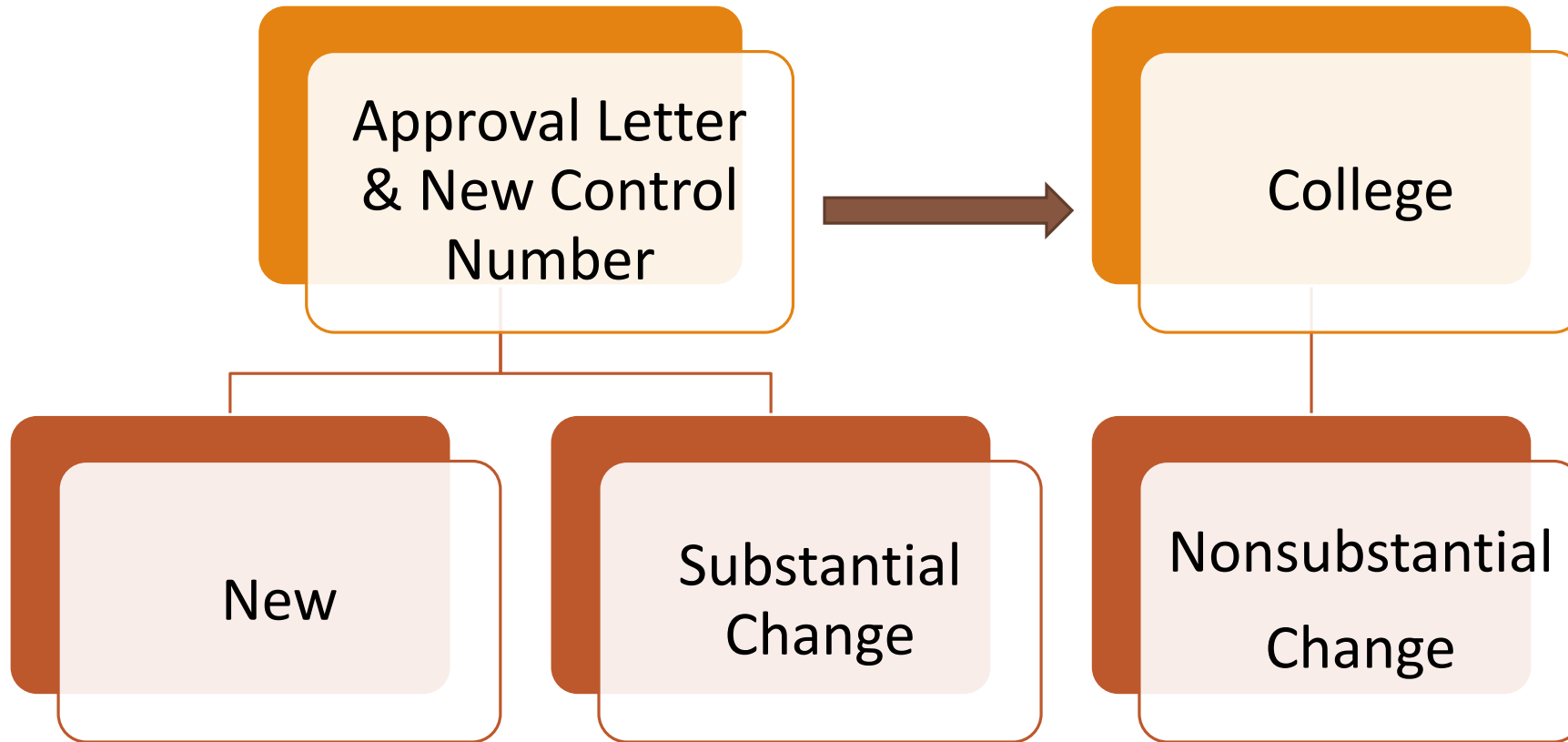
Local processes and procedures for curriculum should include checks to ensure FA eligible programs:

- Have Chancellor's Office approval, including listing in COCI
- COCI matches exactly with--
  - College Catalog
  - Title IV Federal Financial Aid PPA
  - Program listing in school-based software

Collaboration is Key! How do your local processes encourage and verify collaboration between appropriate college personnel?

# Chancellor's Office Process for Programs

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# Sub. vs. Nonsub. Changes

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## **Substantial**

New Program Record

New Program Control Number

- Goals/Objectives
- TOP Code--different discipline
- New program award using active proposal

## **Nonsubstantial\***

- ***Changes Active Program Record***
- ***Same Program Control Number***
  - Program title
  - TOP Code--same discipline
  - Unit changes
  - Addition/removal of courses



# Program Eligibility & FA

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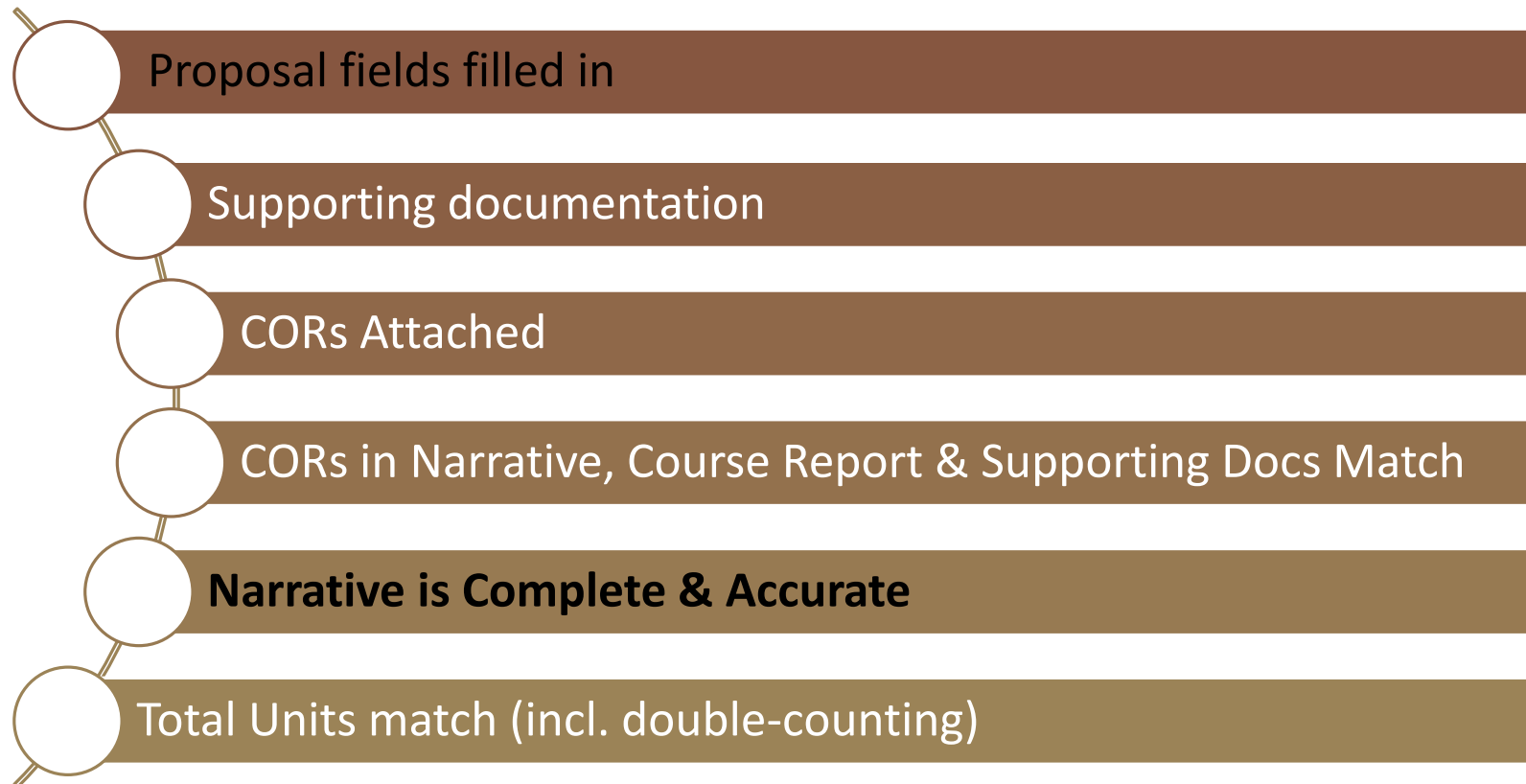
# Chancellor's Office/Local Review for CTE and FA Eligibility

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- Supporting Documentation:**
  - Labor Market Information (LMI) & Analysis
  - Regional Consortia Recommendation
  - Advisory Committee Recommendation
  - Program Review Date:**
  - Must be within 2 years, Education Code 78016

# Chancellor's Office/Local Review for ADTs & AA/AS Transfer (non-CTE) & FA Eligibility

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# What Makes a Program Eligible?

## DEGREES (AA/AS/BA/BS)

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Types of eligible programs:

- Bachelors degree
- Associate degree for transfer (ADTs)
- Associates degree
- Transfer
  - General: 668.8(b)(1)(ii) The successful completion of at least a two-year program that is acceptable for full credit toward a bachelor's degree and qualifies a student for admission into the third year of a bachelor's degree program
  - IGETC Certification + AS/AA
  - CSU GE Breadth Certification + AS/AA
  - Not certificates

# What Makes a Program Financial Aid Eligible?

## CERTIFICATES

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Certificate (must lead to gainful employment in recognized occupation):

- At least 600 clock hours, 16 semester credit hours or 24 quarter credit hours AND 15 weeks of instruction
- At least 300 clock hours, 8 semester credit hours or 12 quarter credit hours AND 10 weeks of instruction AND require the student already have prior completion of at least an associate degree
- At least 300 clock hours but less than 600 clock hours AND 10 weeks of instruction AND meet completion and placement rate requirements (short term)(Direct loan only)

# Steps for Maintaining Financial Aid Eligibility: New Educational Programs

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ECAR = Eligibility and Certification Approval Report

ECAR lists the eligible programs approved by ED

Eligibility does not automatically include new programs

- In some cases, the school may make a self-determination of program eligibility and report at next recertification
- In some cases, the school must report and obtain approval before disbursing funds to enrolled students

# Steps for Maintaining Eligibility: New Ed. Programs, Self-Determination

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There are two cases in which a school may determine program eligibility without prior ED approval

1. The added program leads to an associate, bachelor's, professional, or graduate degree; the school has already been approved to offer programs at that level; and the school's PPA does not require approval of the program; or
2. A fully certified school adds a program that is at least:
  - 10-weeks (of instructional time) in length, **AND**
  - 8 semester hours, 12 quarter hours, or 600 clock hours, **AND that**
  - Prepares students for gainful employment in the same or related Recognized Occupation as an educational program that the Department already has designated as an eligible program at the school
  - ("Recognized Occupation" as defined in 34 CFR 600.2)

# Steps for Maintaining Eligibility: New Ed. Programs, Self-Determination (cont.)

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If a school makes a self-determination:

- It must have received the required state and accrediting agency approvals before making the decision
- It must meet all required Gainful Employment Disclosures, Reporting, and Certification requirements
- It must include the “self-certified” program on the next recertification E-App, or may report the program sooner
- **It is liable for FSA funds disbursed if self-determination is found to be incorrect**



# Steps for Maintaining Eligibility: New Ed. Programs, with ED Approval

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School must report and receive approval:

- For any program under 600 clock-hours, regardless of school's eligibility (short term program), unless the program requires an associate degree for admission
- For any program added by a provisionally certified school (per PPA)
- For a new non-degree program at a fully certified school in a program of study different or unrelated to already eligible programs
- For a new Direct Assessment Program
- For a new Comprehensive Transition and Postsecondary (CTP) Program (Intellectual Disabilities)

# Steps for Maintaining Eligibility: New Ed. Programs, ED Review 1

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ED will review all reported educational programs

- Ensure program meets eligibility requirements
- Evaluate school's administrative and financial capability (if program approval is required)
- If approved, a revised ECAR and Approval Letter is issued
- School may disburse funds after receiving Approval Letter (if program approval is required)
- If not approved, Denial Letter is issued; school may request reconsideration; school is liable if disbursements made

# Steps for Maintaining Eligibility: New Ed. Programs, ED Review 2

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ED will ensure program meets eligibility requirements:

- Accreditor and state approval matches E-App (name and program length)
- CIP Code consistent with name of program
- Leads to a recognized occupation (SOC code) where required
- Meets minimum weeks and clock- or credit-hours
- Meets clock to credit conversion where required

# Steps for Maintaining Eligibility: New Ed. Programs, ED Review 3

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ED will ensure program meets eligibility requirements (continued):

- Meets placement and completion rates, and has been in existence for one year, if short term (less than 600 hours)
- Does not exceed by more than 50% the minimum number of clock-hours established by the state for training in the occupation for which the program prepares students
- Aid is calculated based on clock-hours if licensing requirement stated clock-hours

# Steps for Maintaining Eligibility: New Ed. Programs, ED Review 4

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ED will ensure program meets eligibility requirements (continued):

- Program meets special requirements if Direct Assessment Program - See DCL GEN-13-10
- Program meets special requirements if Comprehensive Transition and Postsecondary (CTP) Program - See DCL GEN-11-01

# Clock Hours & Program Req. for Title IV

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In 2012, presentation on requirement that certain types of certificate programs must be treated as clock hour programs for Title IV (***34 C.F.R. 668.8(k)(2)***)

In spite of the training, many California community colleges did not meet this requirement

Although this requirement will be gone on July 1, 2016, it is still in effect

Schools must transition the programs back to credit hours

# Distance Education & FA

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# Distance Education (DE) Definition

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Uses one or more forms of technology to deliver instruction

Technology supports **regular and substantive interaction** between students and instructor, including **regular instructor-initiated contact**

Students are separated from instructor and instruction may be:

- Synchronous (real-time interaction between students/instructor), or
- Asynchronous (work is completed on student's own time/schedule, without real-time interaction with the instructor)



# DE Technologies

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Technologies may include:

- The internet (e.g. Canvas)
- One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices
- Audio conferencing, or
- Video cassettes, DVDs, and CD-ROMs, if they are used in a course in conjunction with any of the three technologies listed above
  - See **34 C.F.R. § 600.2**

# Correspondence vs. DE

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Correspondence courses are not distance education courses! (See *34 C.F.R. § 600.2*):

- Institution provides instructional materials and examinations via mail or electronic transmission
- Students are separated from instructor
- Interaction between students and instructor is limited, is not regular or substantive
- Interaction is primarily initiated by student
- Correspondence courses are typically self-paced
- If part correspondence and part residential, ED considers the course as correspondence

# DE Course Approval

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§55206, the Curriculum Committee must approve any course delivering any portion of its content via distance education separately

- The course should be separately reviewed and approved according to the district's adopted course approval procedures via separate action.
- The committee should consider how Instruction and Evaluation will take place to maintain regular effective contact with students (incl. instructor-initiated contact)
- Examples of Online Methods of Instruction include (but aren't limited to) threaded discussions; instructor developed web lectures; converted power point presentations; digital video clips; graphics (digital charts, diagrams, photos, images, annotated screen shots); digital animations; web quests; online reference resources chat; email; CD/DVD support materials; instructor website; online library resources; textbook supplements.
- Citing "Canvas" is not sufficient

# Vetting of Individual Course Design

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The College should adopt local procedures and support for individual course design for best practices, including T5 and AD

Consider:

- Local training and certification
- Technical and Design Support for faculty and staff
- [Online Education Initiative Rubric](#) as a local baseline
- Be ready for reviews/audits of individual sections, as well as evidence of CC review

# Correspondence and Institutional Eligibility

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Correspondence courses and programs may be eligible for Title IV (TIV), but with specific limitations

- If more than 50% of courses **OR** 50% or more of students are enrolled in correspondence courses, **the institution is not eligible**
- See **34 C.F.R. § 600.7** for conditions of institutional ineligibility

# Additional Considerations

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An eligible institution is the sum of its eligible programs and it determines which programs it will include as eligible programs

An institution **may decide to exclude** correspondence programs from Title IV eligibility—*that is allowable*

An institution **may have incorrectly identified** programs/courses as DE or correspondence

Certificate programs offered via correspondence are not eligible for Title IV

# Reference Materials

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## Federal Student Aid Handbook (2016)

- v2, Chapt 1: “Institutional Eligibility,” pp 5-16
- v2, Chapt 2: “Program Legibility and DE,” pp 17-34
- v2, Chapt 6: “Consumer Info and Disclosures,” pp 109-142

[“The Role of Curriculum in Maintaining Your Institution’s Financial Aid Integrity--Training Materials.”](#)  
[IEPI \(2016\)](#)

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*QUESTIONS?*