Memo

To: Financial Aid Administrators
    Postsecondary Institutions
From: Elizabeth K. McCloud
    Vice President,
    PA State Grant and Special Programs
Date: April 2020
Subject: PA State Grant Program – COVID-19 Frequently Asked Questions (FAQs)

This memo provides FAQs to further expand upon the COVID-19 related adjustments to program requirements of the PA State Grant Program. FAQ guidance related to other programs administered by PHEAA will be communicated separately.

These FAQs are intended to guide you through PA State Grant Program policy exceptions being made for the Winter and Spring 2020 terms in response to COVID-19 (coronavirus). Please note, outside of the policy adjustments described, this does not otherwise supersede guidance contained in the PA State Grant Handbook and should be applied in conjunction with current program policy. We recognize and continue to expect your good faith efforts to comply with the intent of the guidance as you administer the PA State Grant Program. Please also note the previously released COVID-19 guidance, which can be found at PHEAA.org/COVID19.

Please remember that all schools must adhere to regulatory agency, accreditation, licensing board, Title IV, and privacy requirements, as these provisions do not override such requirements, nor does PHEAA have the authority to waive such requirements. PHEAA understands that school administrators may be working remotely and continues an expectation that student data will be appropriately safeguarded during this time.

The following adjustments to PA State Grant Program requirements for students who are enrolled in the Winter or Spring 2020 term only apply in cases where all of the following are true:

- The student has not completely withdrawn from the term prior to COVID-19 disruptions; and
- The student may no longer be full time but has not completely withdrawn from the term due to COVID-19 disruptions; and
- The school has not reversed all of the student’s tuition charges for the term.

General

Q: What do you mean by “prior to COVID-19 disruptions”?

PHEAA recognizes that each institution has made decisions related to COVID-19 on its own timeframe. As such, each school will be permitted to determine and document the timing of COVID-19 changes. In general, the date your institution officially released information to students can be documented as the decision date. However, it is understood that certain students or populations of students, such as study-abroad students, may have been impacted prior to your institution’s official response to COVID-19. Therefore, you may document earlier dates related to these students for purposes of applying the PA State Grant COVID-19 exceptions.

Q: If our institution reduces tuition and/or mandatory fee charges, do we need to report this?

Yes, this may need to be reported in certain situations. Reporting revised costs is required if the revised tuition and fee amount is more than 25% lower than the PHEAA-approved tuition and fee amount for the
2019-20 Academic Year. Please follow the guidance outlined in Chapter 2, Section O of the PA State Grant Handbook. Please note that if the institution is not reducing the initial fee that was charged, but is applying a waiver to offset a portion of the charge, then no reporting is necessary.

Q: Is our institution required to report waivers of room and board?

No, since the PA State Grant Program uses a standard Educational Expense Allowance (EEA) for all institutions, no reporting is required with regard to changes to room and board charges.

Q: We are in the midst of making decisions regarding our summer term that will start in mid-May. Does this guidance extend to that period as well or when can we expect to know more about summer awarding and eligibility concerns?

At this time, this guidance only applies to the Winter 2020 and Spring 2020 terms. Adjustments to program requirements for future terms will be considered as PHEAA continues to monitor the impact of COVID-19. PA State Grant and Special Programs staff is currently assessing those impacts and will have additional information to share at a later date.

Term Length and Term Start Dates

Q: Our scheduled Winter or Spring 2020 term meets the length requirement for the PA State Grant Program as listed in the 2019-20 PA State Grant Program Handbook. In response to COVID-19, our institution has extended Spring Break and now the term will not meet the requirement. Are our students now ineligible due to inadequate term length if we do not extend the end date of the term?

As a prerequisite, the Winter 2020 and/or Spring 2020 term(s) must have initially been structured to meet the minimum term length requirement (10 weeks for quarter schools and 15 weeks for semester schools). These term length requirements are regulatory and outlined in Chapter 1, Section E of the PA State Grant Handbook. If, however, the student could not attend for the minimum number of weeks due to the school's temporary closing or extended breaks as a result of a COVID-19 response, then the student should be considered as continuing to meet the minimum term length requirement.

Q: A student at our institution was administratively dropped from her study abroad program due to COVID-19 and is now registered in the second module of the term. Since the second module alone does not meet the PA State Grant Program term length definition, does the student’s enrollment meet the term length requirement?

Assuming this student’s initial term enrollment satisfied the minimum term length requirement and was then impacted by COVID-19, the student can be viewed as continuing to satisfy the minimum term length requirement for PA State Grant purposes for the Winter 2020 and/or Spring 2020 term(s).

Q: What happens if our institution ceases all instruction for the Spring 2020 term prior to the scheduled end date?

If your institution may have to close for the remainder of the 2019-20 Academic Year and does not plan to reopen during the term, please contact us as soon as possible by email at sghelp@pheaa.org.

Q: My school is part of the Business, Trade, and Technical sector. How does a new term end date affect PA State Grant eligibility?

A revised “end” date for the term will not impact the student’s PA State Grant eligibility for that term. Please keep in mind this may have an impact on subsequent terms. Please contact us by email at sghelp@pheaa.org if you are considering changing your start date for the spring term.
**Instruction Delivery and Enrollment Mode Reporting**

**Q:** In response to COVID-19, our school has moved to 100% online education to complete instruction for the remainder of the 2019-20 Academic Year. How will this change impact PA State Grant eligibility?

If a student’s mode of delivery was impacted by your institution’s response to COVID-19, then the student’s enrollment mode should not be updated and should continue to align with the percentages of online and in-classroom that existed prior to the interruption. For example, if the student was enrolled in “up to 50% distance education (mode 2)” and is now enrolled in “100% distance education (mode 4)” due to the institution’s classroom closure, the enrollment mode should remain “up to 50% distance education” and the award should remain the same. If you are a Non-HQD institution, please contact us by email at sghelp@pheaa.org.

**Q:** We have students who were enrolled in 100% distance education in a module that started after our school’s decision to complete the term 100% online, do we have to update enrollment mode?

Students who were enrolled in 100% distance education prior to a school’s decision to move all classes to 100% online continue to be eligible for the reduced award amount that they would have received had there been no disruption due to COVID-19.

**Q:** Our institution is using a consortium agreement with a provider of online education to enable completion of the 2019-20 Academic Year. Will this impact PA State Grant eligibility?

PHEAA understands that some institutions (both HQD and Non-HQD) may be using contractual or consortium agreements to enable the completion of the academic year. Students will remain eligible for PA State Grant Program awards as though the school was continuing to provide classroom instruction for the full term. This only applies in cases where a third-party provider is assisting the home institution in delivering credits on behalf of the home institution for the term, as opposed to credits being transferred to the home school from the third-party provider.

**Q:** In response to COVID-19, our school is continuing to offer in-classroom courses, but has also offered online education to the student body as an option. How will this impact the PA State Grant eligibility of our students?

Whether a student’s coursework is voluntarily or involuntarily changed to a different mode of delivery due to your institution’s response to COVID-19, the student’s enrollment mode should continue to align with the percentages of online and in-classroom enrollment that existed prior to the interruption. For example, many study abroad students returned to the United States and continued to study online. Another example would be students who decided to self-quarantine, opting to continue the term online. No enrollment mode updates are necessary in these examples. The students were originally determined to be 100% classroom (mode 1) and would retain that eligibility.

**Q:** Our institution operates on a quarter schedule and our spring term will only be offered online in response to COVID-19. Should our students be reported as “100% distance education (mode 4)”?

If a student’s mode of delivery was impacted by your institution’s response to COVID-19, then the student’s enrollment mode should continue to align with the percentages of online and in-classroom that were planned prior to COVID-19. A student enrolled at an HQD institution should have enrollment mode reported based on the student’s planned enrollment prior to the COVID-19 disruption. For example, if a student had planned to enroll “100% distance education (mode 4)”, regardless of COVID-19 changes, then that would be reported. Along these same lines, a student enrolled at a Non-HQD institution would still be reported as enrolled in a “DE Program of Study” if that is applicable.

If you are a Non-HQD institution with students who intended to but no longer have the option of enrolling in classroom courses, please contact us by email at sghelp@pheaa.org to receive a confirmation prior to crediting awards for the impacted term.
Withdrawals and Dropped Courses

Q: If a student completely withdrew from school prior to our institution’s COVID-19 action, is the student eligible?

If the student withdrew from school prior to your institution’s COVID-19 action, you must follow the withdrawal procedures outlined in Chapter 3, Section C of the PA State Grant Program Handbook to determine eligibility. This also applies if the student completely withdrew from the term due to leaving a study abroad location as a result of COVID-19.

Q: If the student withdrew/withdraws from school due to a decision to self-quarantine, how should the withdrawal be processed?

If the student withdrew from school as a result of COVID-19, you still must follow the withdrawal procedures outlined in Chapter 3, Section C of the PA State Grant Program Handbook to determine eligibility.

Q: If a student dropped from courses after our institution’s COVID-19 action, resulting in a change from full- to half-time or less than half-time, what action should be taken?

If a student dropped courses (will not show on the transcript) in the Winter 2020 and/or Spring 2020 terms, after your institution’s COVID-19 action, the institution may continue to report the student under the original enrollment. The initial enrollment for the student, as well as the timing of the COVID-19 disruptions, must be clearly documented in your institution’s records. Please note that this may impact the student’s ability to satisfy Academic Progress and the student may require an exception in the future. Please refer to the Academic Progress FAQs for further guidance.

Q: If a student partially withdrew from courses after our institution’s COVID-19 action, resulting in a change from full- to half-time or less than half-time, what action should be taken?

If a student withdrew from courses (will show on the transcript, usually “W” grade) after your institution’s COVID-19 action, the student’s award may align with the number of credits in which they were enrolled prior to the COVID-19 action. However, the school retains the options outlined in Chapter 3, Section C of the PA State Grant Program Handbook. Please note that this may impact the student’s ability to satisfy Academic Progress and the student may require an exception in the future. Please refer to the Academic Progress FAQs for further guidance.

Q: If a student takes a leave of absence due to COVID-19-related reason, what is the impact on PA State Grant eligibility?

If a student is taking an approved leave of absence due to a coronavirus-related reason (e.g., the student’s child is home due to K-12 closure, the student contracted coronavirus, etc.), the school should reference the withdrawal options outlined in Chapter 3, Section C of the PA State Grant Program Handbook. Please note that this may impact the student’s ability to satisfy Academic Progress and the student may require an exception in the future. Please refer to the Academic Progress FAQs for further guidance.

Satisfactory Academic Progress

Q: If a student is forced to withdraw from classes because of an institution closure where alternative methods of instruction cannot be arranged, would the student’s Satisfactory Academic Progress still be calculated based on earning 24 credits in the previous two terms since being awarded a PA State Grant?

Yes, Academic Progress would still be calculated based on earning the number of credits commensurate with the PA State Grant award received during each term. Please keep in mind, that students may request an exception when there is a failure to complete the required number of credits to satisfy the Academic Progress test. COVID-19 is an extenuating circumstance that PHEAA will consider in relation to the Winter 2020 and/or Spring 2020 terms when considering exceptions to Satisfactory Academic Progress. The Academic Progress Exception Form and instructions are available on PHEAA.org/forms.
Q: My institution is making all courses Pass/Fail for the Spring 2020 semester in response to COVID-19. Will this impact Satisfactory Academic Progress for the PA State Grant Program? What about the Ready to Succeed Scholarship (RTSS) Program?

While pass/fail credits count toward a student’s eligibility determination, qualitative measures such as grade point average (GPA) are not evaluated for PA State Grant purposes. Therefore, a change to pass/fail grading does not impact Satisfactory Academic Progress for the PA State Grant Program.

For the RTSS Program, students must demonstrate outstanding academic achievement by attaining a certain minimum cumulative Grade Point Average (GPA) by the time the school checks Satisfactory Academic Progress for the PA State Grant Program. Similar to what was noted for the PA State Grant Program, schools may count the pass/fail courses towards the RTSS eligibility determination of 24 semester credits or the equivalent. These pass/fail credits, however, are not factored into the student’s GPA calculation; therefore, the credits cannot be considered in the student’s cumulative GPA.

Q: I have been in communication with a student who thinks they will need an Academic Progress exception completed. If I recall correctly, someone from my office will need to sign the form. Is there a work-around that PHEAA has in place for these scenarios in which the Aid Office needs to sign a form?

Yes. Understanding that offices may be closed or students may be unable to access campus officials, we have determined that an email from the Financial Aid Administrator paired with the student’s submission would be sufficient during this time. The email should be directed to sghelp@pheaa.org and indicate some of the same elements that you would have attested to on the form (e.g., agreement with the student’s information, withdrawal information, etc.).

Q: Can you please provide some Academic Progress examples as they relate to COVID-19 disruptions?

Example 1: Academic Progress Failure; No COVID-19 Exception Allowed

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<th>TERM</th>
<th>SUMMER 2019</th>
<th>FALL 2019</th>
<th>SPRING 2020</th>
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<tbody>
<tr>
<td>Credits Attempted</td>
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<td>PA State Grant Awarded</td>
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<tr>
<td>Credits Earned</td>
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**Summary:** Student did not make progress at the end of Spring 2020 since only 21 credits were earned and 24 were needed to satisfy the minimum enrollment for all awarded terms. This student is not eligible to submit an Academic Progress Exception Form based on COVID-19 extenuating circumstance since the Fall 2019 term, where the deficit occurred, is not the term impacted by COVID-19.

**Action:** Reject the student for progress effective with the next term, Summer 2020 or Fall 2020. The student will remain ineligible for subsequent terms until the three regular credits are earned.

**Assumptions:** This example assumes a semester schedule, no remedial courses or repeat courses, and that Academic Progress is verified after the spring term.

Example 2: Academic Progress Failure; COVID-19 Possible Exception

<table>
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<tr>
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</tr>
<tr>
<td>Credits Earned</td>
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<td>12</td>
<td>9</td>
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</tbody>
</table>
Summary: Student did not make progress at the end of Spring 2020 since only 21 credits were earned and 24 were needed to satisfy the minimum enrollment for all awarded terms. This student may be eligible to submit an Academic Progress Exception Form based on COVID-19 extenuating circumstance if the reason for the deficit of 3 credits was COVID-19-related.

Action: Reject the student for progress effective with the next term, Summer 2020 or Fall 2020. The student will remain ineligible for subsequent terms until the three regular credits are earned or an Academic Progress Exception Form is signed by the school, submitted by the student, and approved by PHEAA.

Assumptions: This example assumes a semester schedule, no remedial courses or repeat courses, and that Academic Progress is verified after the spring term.

Example 3: Academic Progress Met; No Exception Needed

<table>
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<td>PA State Grant Awarded</td>
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</tr>
<tr>
<td>Credits Earned</td>
<td>0</td>
<td>15</td>
<td>9</td>
</tr>
</tbody>
</table>

Summary: This student was enrolled in 15 credits prior to COVID-19. The student's transcript shows 12 attempted credits with one, 3-credit course being a withdrawal and one, 3-credit course having been dropped related to COVID-19 which does not show on the transcript. Since the student needed and earned 24 credits at the end of Spring 2020, progress is met. Had this student been enrolled in only 12 credits for the Fall 2019 term and had passed those credits, the student would have a deficit for the Spring 2020 and failed progress; however, the student would be eligible for exception consideration.

Action: No action required.

Assumptions: This example assumes a semester schedule, no remedial courses or repeat courses, and that Academic Progress is verified after the spring term.

Winter/Spring Crediting and 2019-20 Disbursement Reconciliation

Q: Will my school be penalized if we are unable to return winter, spring or Reconciliation rosters for the 2019-20 Academic Year by the prescribed deadlines?

PHEAA will make reasonable accommodations for exceptions to the ability of a school to comply with roster return and reconciliation deadlines during this extraordinary time. While delays in returning rosters or refunds will still hold up future disbursements, schools will not be penalized for these delays in a Program Review. Delays should be documented by the institution and communicated to PHEAA via email to sghelp@pheaa.org with the subject line of “COVID-19 Delay.” In the body of your email, please provide information on when you anticipate being able to return the roster.

Q: Are school users prohibited from printing rosters at a remote work site?

PHEAA does not have the authority to waive privacy requirements. PHEAA understands that school administrators may be working remotely and continues an expectation that student data will be appropriately safeguarded during this time.

If there are any additional changes in policy as it relates to the COVID-19 situation, PHEAA will communicate this directly to institutions. If you have questions which have not been addressed by this guidance, please send them to sghelp@pheaa.org.