Memo

To: Participating Schools and Partners
From: Elizabeth K. McCloud
       Vice President,
       PA State Grant and Special Programs
Date: March 2020
Subject: PA Special Programs – COVID-19 Guidance

The Pennsylvania Higher Education Assistance Agency (PHEAA) has been reviewing the impact of COVID-19 on students, schools, and partners as it relates to Special Programs administered by PHEAA. PHEAA has monitored the COVID-19 situation and been in contact with Pennsylvania postsecondary institutions, employers, and partners, as they have made operational changes that may include, but are not limited to: 1) extending spring breaks; 2) moving students from the traditional classroom environment to distance education; and 3) canceling certain education experiences, such as study abroad or student teaching.

In focusing on the health and safety of Pennsylvania families, the PHEAA Board of Directors has exercised its authority as administrator and servicer of the programs to provide relief to students impacted by these changes as they pursue their postsecondary education. PHEAA’s goal is to review policies and take appropriate actions to minimize disruption for Pennsylvania’s student population by easing financial burdens and maintaining access to higher education, within the bounds of statutory authority.

Please note the following adjustments to the assorted special program requirements for students who are enrolled in the Winter or Spring 2020 term.

Conditions: The adjustments to individual program requirements only apply in cases where all of the following conditions are true:

- The student has not completely withdrawn from the term prior to COVID-19 disruptions
- The student may no longer be full time; however, the student has not completely withdrawn from the term due to COVID-19 disruptions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

Ready to Succeed Scholarship Program (RTSS)

It is anticipated that very few adjustments to RTSS awards will be required as a result of COVID-19 disruptions.

Previously credited awards for the Winter and Spring 2020 terms – Students who meet the above conditions will remain eligible for credited awards for the Winter and Spring 2020 terms under the eligibility for which the awards were initially credited prior to COVID-19 disruptions, as determined and documented by the institution. This eligibility will be retained regardless of changes within the term to: a school’s academic calendar, the mode of delivery of coursework, or changes to a student’s enrollment across all modules in a term.

Future crediting of awards for the Winter and Spring 2020 terms – Students who meet the above conditions and whose awards have not yet been credited will be eligible to receive awards for the Winter and Spring 2020 terms based on each school’s initial enrollment options for the term prior to COVID-19 disruptions, as determined and documented by the institution. This eligibility will be
retained regardless of changes within the term to: a school’s academic calendar, the mode of delivery of coursework, or changes to a student’s enrollment across all modules in a term.

**Partnerships for Access to Higher Education (PATH)**

It is anticipated that very few adjustments to PATH awards will be required as a result of COVID-19 disruptions.

**Previously credited awards for the Winter and Spring 2020 terms** – Students who meet the above conditions will remain eligible for credited awards for the Winter and Spring 2020 terms under the eligibility for which the awards were initially credited prior to COVID-19 disruptions, as determined and documented by the institution. This eligibility will be retained regardless of changes within the term to: a school’s academic calendar, the mode of delivery of coursework, or changes to a student’s enrollment across all modules in a term.

**Future crediting of awards for the Winter and Spring 2020 terms** – Students who meet the above conditions and whose awards have not yet been credited will be eligible to receive awards for the Winter and Spring 2020 terms based on each school’s initial enrollment options for the term prior to COVID-19 disruptions, as determined and documented by the institution. This eligibility will be retained regardless of changes within the term to: a school’s academic calendar, the mode of delivery of coursework, or changes to a student’s enrollment across all modules in a term.

**Receipt of partner funds** – Schools will not be penalized for keeping disbursed PATH funds longer than allowed if the school documents communication with the PATH partner organization regarding COVID-19 related disruption to the organization function and ability to disburse scholarship funds to the school in a timely manner. In all cases, however, schools must return PATH funds to PHEAA no later than July 1, 2020 if partner scholarship funds have not been received prior to that date.

**PA Targeted Industry Program (PA-TIP)**

It is anticipated that very few adjustments to PA-TIP awards will be required as a result of COVID-19 disruptions.

**Previously credited awards for the Winter, Spring, and Summer 2020 terms** – Students who meet the above conditions will remain eligible for credited awards for the Winter, Spring, and Summer 2020 terms under the eligibility for which the awards were initially credited prior to COVID-19 disruptions, as determined and documented by the institution. This eligibility will be retained regardless of changes within the term to a school’s academic calendar.

**Future crediting of awards for the Winter, Spring, and Summer 2020 terms** – Students who meet the above conditions and whose awards have not yet been credited will be eligible to receive awards for the Winter, Spring, and Summer 2020 terms based on each school’s initial enrollment options for the term prior to COVID-19 disruptions, as determined and documented by the institution. This eligibility will be retained regardless of changes within the term to a school’s academic calendar.

**Higher Education of the Disadvantaged (Act 101) Program**

PHEAA understands that participating Act 101 Program schools may not be able to provide programming and support to students as initially planned for the remainder of the 2019-20 Academic Year. Act 101 Directors are encouraged to reach out to PHEAA staff via the Act101@pheaa.org program mailbox with specific questions.

**Institutional Assistance Grants (IAG)**

Please view the PHEAA memo titled “PA State Grant Program – COVID-19 Guidance” for specific information regarding any potential adjustments to student eligibility for the PA State Grant Program,
the primary driver of institutional IAG funding levels. It is anticipated that little variation in IAG eligibility will be experienced as a result of COVID-19 disruptions. Additionally, students who withdraw from the Winter or Spring 2020 term due to COVID-19 disruptions, as determined and documented by the institution, will be allowed in an institution’s count of PA State Grant Program recipients for the 2019-20 Award Year.

**Federal Work-Study Programs (FWS-ON, FWS-CS)**

If institutions are still utilizing their federally provided FWS funds, then no changes will be necessary for FWS-ON and FWS-CS.

**State Work-Study Program (SWSP)**

Institutions: If schools as employers are continuing to pay students according to a planned work schedule, similar to Federal Work-Study Program guidance, then PHEAA will continue to reimburse for submitted hours, regardless of a student’s actual ability to work.

Non-School Employers: If non-school employers are continuing to pay students according to a planned work schedule, then PHEAA will continue to reimburse for submitted hours, regardless of a student’s actual ability to work.

**Higher Education for Blind or Deaf Students Program (BDBG)**

Each BDBG award recipient continues to be eligible for the award as long as the student has not withdrawn from the institution prior to crediting of the award.

**Pennsylvania Internship Program**

Each award recipient continues to be eligible for the award as long as the student has not withdrawn from the institution prior to crediting of the award.

**All PHEAA-Administered Programs:**

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.

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. In addition, schools, who would normally need to print, sign, and fax roster changes to PHEAA, will be permitted to certify and make adjustments to rosters electronically as long as the email subject line is clearly identified by program and the email address and email signature (footer) match the email address and contact on file with PHEAA.

Please note, outside of the policy adjustments described in this memo, this guidance does not otherwise supersede guidance contained within the program guidelines 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 above guidance as you administer Pennsylvania aid programs.

FAQs with specific scenarios are forthcoming, and if there are any additional changes in policy as it relates to the COVID-19 situation, PHEAA will communicate this directly to institutions and partners. If you have questions which have not been addressed by this guidance or questions related to programs not referenced (e.g., EAP, Chafee, PEGP), please send them to the specific program inboxes. Mailboxes for all PHEAA-administered programs can be found at https://www.pheaa.org/documents/sgsp/ph/contact-list.pdf.