Memo

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

The Pennsylvania Higher Education Assistance Agency (PHEAA) has continued to review the impact of COVID-19 on students, schools, and partners as it relates to Special Programs administered by PHEAA.

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 extend the relief provided to students impacted by these changes as they pursue their postsecondary education during the Summer 2020 term. 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 Summer 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- The student has not completely withdrawn from the term prior to COVID-19 disruptions; and
- The student may no longer be full time; however, the student has not completely withdrawn from the term due to COVID-19 disruptions; and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.

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 Summer 2020 term – Students who meet the above conditions will remain eligible for credited awards for the Summer 2020 term 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 Summer 2020 term – Students who meet the above conditions and whose awards have not yet been credited will be eligible to receive awards for the Summer 2020 term 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.

Schools do not need to take into account emergency aid funds associated with the CARES Act, whether in the form of Emergency Federal Supplemental Educational Opportunity Grant (FSEOG) or Higher Education Emergency Relief Fund (HEERF) grants, to adjust either program costs or aid to the student,
when determining the 2019-20 PA-TIP award, including for the Summer 2020 term.

As July 1 marks the initial start date for the Fall term, if an institution’s Summer 2020 term was originally during the 2019-20 Academic Year and is moved to begin July 1 or later due to COVID-19, then the institution will need to cancel the students’ Summer 2020 awards and submit a 2020-21 PA-TIP Renewal Application. Students would also have to apply for 2020-21 to receive PA-TIP funds in Fall 2020-21 that were originally scheduled in the Summer of 2019-20. The institution’s renewal application will be available in the beginning of June, and the 2020-21 student application will be available around the end of June.

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

In completing the 2019-20 Act 101 Report, schools should not include any emergency aid funds associated with the CARES Act, whether in the form of Emergency Federal Supplemental Educational Opportunity Grant (FSEOG) or Higher Education Emergency Relief Fund (HEERF) grants, when reporting aid received by 2019-20 Act 101 students. Please report the amount of aid that students were awarded before receiving any additional funds as a result of the CARES Act.

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

Institutions will not lose funding eligibility within the FWS-ON or FWS-CS programs for changes in the usage of the federal share of Campus-Based funds during the 2019-20 year as a result of COVID-19. This includes transfers of unexpended FWS allocation into FSEOG, as allowed under the CARES Act. Institutions should continue to report on FWS-ON and FWS-CS as they normally would for the year-end reporting to PHEAA.

**PA 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 from the U.S. Department of Education, 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.

If there are any adjustments to your planned SWSP positions, please update PHEAA via email at swsp@pheaa.org.

The requirement that an employer report student hours within 60 days after the end of the pay period is extended to 90 days for the 2019-20 Program Year. Appeals for reimbursement are not required until after 90 days.

**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 and partners 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 program 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 or organization 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.

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 your institution has experienced significant shifts in term start dates for the Spring and/or Summer 2020 terms, or if you have questions which have not been addressed by this guidance or questions related to programs not referenced (e.g., RTSS, PATH, IAG, BDBG, EAP, Chafee, PEGP), please send them to the specific program inboxes.

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