Memo

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

This memo provides FAQs to further expand upon the COVID-19 related adjustments to program requirements of the Special Programs administered by PHEAA. FAQ guidance related to the PA State Grant Program has been communicated separately and can be found at PHEAA.org/COVID19.

These FAQs are intended to guide you through policy exceptions being made for the Winter and Spring 2020 terms, as announced in the PA Special Programs – COVID-19 Guidance Memo, which can be found at PHEAA.org/COVID19. Please note, outside of the policy adjustments described, this does not otherwise supersede guidance contained within the program guidelines and should be applied in conjunction with current program policies. We recognize and continue to expect your good faith efforts to comply with the intent of the guidance as you administer Pennsylvania aid 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 and program partners may be working remotely and continues an expectation that student data will be appropriately safeguarded during this time.

The following adjustments to the assorted 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- The student has not completely withdrawn from the term prior to COVID-19 disruptions; and
- The student may no longer be full time; however, the student has not completely withdrawn from the term due to COVID-19 disruptions; and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.

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 COVID-19 exceptions.

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

The answer to this question depends on the program a student is receiving:

If the student is receiving PA-TIP, BDBG, or PATH and the institution is still charging the student a portion of tuition and/or mandatory fees for the term, the institution can continue to calculate eligibility based on the student’s cost and need prior to the reduction in charges that was made as a result of the COVID-19 disruption. This does not apply in cases where a student’s entire cost is reversed or where a student is considered to have withdrawn from the term.

If the student is receiving Chafee or EAP, the institution should follow the guidance in the 2019-20 program guidelines for these programs. Please send your specific questions to the program mailboxes.

If an institution has applied a PEGP waiver and then reduces a student’s tuition, mandatory fees, or room and board charges, the institution should provide updated waiver information to PHEAA via email at pegp@pheaa.org.

Q: Is there a way to electronically certify program rosters and certification/award listings without printing and scanning?

Schools, who would normally need to print, sign, and fax roster changes to PHEAA, will be permitted to certify and make adjustments to rosters and certification/award listings 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.

Q. I cannot access PageCenter due to working remotely. How can I access and certify listings and rosters?

If you are experiencing PageCenter access issues while working remotely, please contact us at 1-800-443-0646 (Option 3).

Q: Will my school be penalized if we are unable to return program rosters, certification/award listings, or refunds 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 the program mailbox with the subject line of “COVID-19 Delay.”

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 any potential summer accommodations due to COVID-19?

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.

Federal Work-Study On-Campus (FWS-ON) and Community Service (FWS-CS) Programs

Q: According to federal guidance, the CARES Act provides flexibilities to institutions surrounding school use of Federal Work Study and SEOG funding. If my institution utilizes these options, will it impact eligibility for 2019-20 FWS-ON or FWS-CS funding?

No, your institution 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.
Q: Is my institution allowed to use the PHEAA FWS-ON or FWS-CS portion of funds to pay students under the provisions allowed by ED, which is to pay students their scheduled hours of work, even if they are not working?

Yes. Institutions may use funds provided by PHEAA to pay student wages for FWS-ON and FWS-CS.

Higher Education of the Disadvantaged (Act 101) Program

Q: How should schools moving toward online enrollment for the remainder of the Winter and/or Spring 2020 terms handle unspent program allocations? For example, my school planned an activity/event that now will not be held due to our campus closure.

PHEAA understands that there may be challenges associated with the transition institutions have encountered due to COVID-19. As Act 101 staff members are working on end of program year budgets, please let us know if there are any specific concerns relating to utilization of program funds. Institutions unable to spend budgeted funds must outline what had been planned to utilize the remaining funds and that it was not possible due to COVID-19. Schools should provide justification in the Program Summary that is due with the annual report submission. For further guidance, please reference the 2019-20 Act 101 Annual Report Instructions memo sent on April 10, 2020.

Q: Can unspent Act 101 funds be used to purchase technology for our students in need?

The purchase of technology for students in need would fall under “educational material” in the category of eligible expenses. Books and fees that would have been included in the student’s original budget for the year are not able to be included.

Q: What should a school do in order to meet the requirement to hold Advisory Meetings (meetings may have been planned for later in the semester but participants are now unavailable/discouraged from coming to campus)?

Act 101 Guidelines note that an Advisory Board is to not direct, but guide the institution’s program. The Advisory Board should offer advice in the areas of program development, recruitment, retention, funding and support services affecting Act 101 students from administration, faculty, the student body, and community. PHEAA understands that current measures do not allow for in-person meetings or discussion. We recommend using technology for remote meetings or at a minimum, communication, such as email, to discuss with your Advisory Board. If your institution chooses to ‘meet’ via email for the 2019-20 Academic Year, we kindly ask that you document the communication so that it is available for review upon request.

Institutional Assistance Grants (IAG) Program

Q: I have a student who was not enrolled in the fall, enrolled in the spring full-time, and then withdrew late in the semester due to COVID-19 and received a full-time PA State Grant award. Can I count this student for IAG purposes?

Yes, a student who withdrew completely from the Winter or Spring 2020 term due to COVID-19 disruptions may be included in the 2019-20 IAG count, even though the student did not complete the term, as long as the student is keeping at least a portion of the PA State Grant award for the term. The student’s enrollment status on the IAG Certification Listing should reflect that of the PA State Grant award on the student’s record.

Partnerships for Access to Higher Education (PATH) Program

Q: If the PATH Partner temporarily closes operations, which has delayed sending of partner funds to an institution, will schools be permitted to retain PHEAA funds for a longer period?

Yes. 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’s 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.

PHEAA conducts its student loan servicing operations commercially as American Education Services and for federally-owned loans as FedLoan Servicing.
Q: Will a student lose PATH eligibility if, as a result of COVID-19, the institution changes the delivery mode to 100% online?

If a student’s mode of delivery was impacted by your institution’s response to COVID-19, then the student’s PA State Grant enrollment mode should not be updated and should continue to align with the percentages of online and in-classroom that were planned prior to COVID-19. 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 both the PA State Grant and PATH awards should remain the same. If you are a Non-HQD institution, please contact us by email at sghelp@phea.org.

PA Targeted Industry Program (PA-TIP)
Q: Should our institution update enrollment status (from full-time to half-time or less) for a student who has a change in enrollment as a result of COVID-19 disruptions?

No, your institution should not update enrollment status for the student as long as the student is still enrolled and has not completely withdrawn from the term. This guidance applies even in cases where a student at a for-profit institution would have lost eligibility due to dropping to half-time enrollment within the normal program guidance.

If the student withdrew from the term, you must follow the withdrawal procedures outlined in Section IX of the 2019-20 PA-TIP Program Guidelines to determine eligibility.

Q: Will a student lose PA-TIP eligibility if, as a result of COVID-19, the institution changes the delivery mode to 100% online during the term?

No, this change in delivery mode will not impact student eligibility for the 2019-20 Program Year.

Q: If a student’s entire term has been scheduled to be taught online as a result of COVID-19, can the student be certified for an award?

A student taking all online courses but still enrolled and meeting program eligibility requirements may be certified for an award.

Q: If a student is placed on a Leave of Absence (LOA) due to COVID-19, should the student be refunded?

A student who is on a LOA should be treated as no longer enrolled. Please follow the normal withdrawal procedures outlined in Section IX of the 2019-20 PA-TIP Program Guidelines to determine eligibility.

Q: What should my institution do if we have been unable to certify awards for the 2019-20 Program Year due to delayed term starts, students having been placed on LOA, or school staff working remotely?

Any efforts that an institution can make to certify or cancel students prior to the July 1 deadline will ensure that funding can be provided to as many eligible students as possible. Please contact PHEAA staff via email at patip@phea.org if your institution anticipates a delay in being able to certify or cancel student awards.

Q: I have a student that is unable to print and sign the 2019-20 PA-TIP application. What should I advise them to do?

PHEAA will accept a document that a student has signed electronically via Adobe. Please have the student contact PHEAA directly. We can provide the student with instructions on how to electronically sign the document and submit. These instructions are also at the end of this memo in case you are able to assist the student directly.
Q: What happens if our institution ceases all instruction for the Spring 2020 term prior to the scheduled end date?

If your institution closes 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 patip@phea.org.

Ready to Succeed Scholarship (RTSS) Program

Q: My institution is making all courses Pass/Fail for the 2020 Spring semester in response to COVID-19. Will this impact students’ ability to meet the initial GPA requirement or the Satisfactory Academic Progress when we evaluate students next year?

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. 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: If a student takes a Leave of Absence (LOA) due to a COVID-19-related reason, what is the impact on RTSS eligibility?

If a student is taking an approved LOA due to a Coronavirus-related reason (e.g., the student’s child is home due to K-12 closure, the student contracted Coronavirus, etc.) and the student has not completely withdrawn from school, then the student shall retain RTSS eligibility assuming the student was eligible prior to the leave of absence. If the award had not been credited due to late RTSS awarding, the student may receive the amount that they would have been eligible for prior to the leave of absence.

PA State Work-Study Program (SWSP)

Q: Can I enter a 2020 Summer SWSP application from a student in a situation where the student was not able to provide a wet signature on the document?

Please have the student sign the document electronically with Adobe instead of a wet signature. If you are unable to enter the application, please also electronically sign the document prior to sending to PHEAA. If you need assistance, please contact us at swsp@phea.org. Instructions on how to electronically sign a document with Adobe are included at the end of this memo for reference.

Q: How will student earnings be impacted if the employer closes operations or if the student elects to self-quarantine?

If the employer chooses to continue paying the student for the hours that the student was scheduled to work prior to COVID-19 disruptions, then the employer can continue to submit those hours to PHEAA for the SWSP share. PHEAA will continue to reimburse for submitted hours, regardless of a student’s actual ability to work. The employer should simply enter hours into the Matching Funds System for which the employer has paid the student for that pay period.

Q: Our institution will complete the remainder of the Spring 2020 semester online due to COVID-19. We plan to pay out a lump sum average to our SWSP participants. This sum will be based upon their average hours worked thus far in the spring semester. Since we will pay out an average lump sum, it will not be tied to specific hours/shifts to report. Can I simply enter the equivalent number of hours for each student to receive matching funds?

If 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. The employer should enter hours commensurate to what the student is being paid into the Matching Funds System. Depending on the number of total hours that require submission, this information may need to be reported over multiple weeks.

PHEAA conducts its student loan servicing operations commercially as American Education Services and for federally-owned loans as FedLoan Servicing.
When submitting hours for reimbursement, please keep in mind the maximum hours permitted for each student is generally set at the time the student’s application is entered in the Matching Funds System and may need to be adjusted under this scenario, not to exceed 40 hours per week. Please also remember that hours cannot be submitted for future pay periods. Please contact PHEAA staff at swsp@pheaa.org for adjustments in a student’s maximum hours or for further guidance on reporting hours commensurate to a lump sum payment.

**PA National Guard Education Assistance Program (EAP)**
PHEAA partners with the PA Department of Military and Veterans Affairs in administering EAP. For questions related to student eligibility impacted by COVID-19, please contact the PA National Guard Education Assistance Office at 717-861-9343 or direct email inquiries to Mrs. Pat Troutman at patricia.m.troutman.nfg@mail.mil.

**PA Chafee Education and Training Grant (Chafee) Program**
Q: I have a student that is unable to print and sign the 2020-21 Chafee ETG/FosterEd application. What should I advise them to do?

Please have the student contact PHEAA directly. We can provide the student with further direction on how to sign the document electronically and submit to PHEAA. Instructions for using Adobe are also at the end of this memo in case you are able to assist the student directly.

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

*Attachment*

*Program Management\SG - KAYF - Memo - Misc\2020\PA Special Programs – COVID-19 FAQ Memo*
How to add a signature to a PDF


1. Open the PDF file in Adobe Acrobat Reader.

2. Click on Fill & Sign in the Tools pane on the right.

3. Click Sign, and then select Add Signature.
4. A pop-up will open, giving you three options—Type, Draw, and Image. Choose Draw or Image.* Once you’re done, click the Apply button.

*Type allows you to type your name in cursive format. This is not an acceptable option for an e-signature, and the form will be returned for a valid option.

*Draw allows you to draw the signature using your mouse, touchpad, or a pen if you’re using a touchscreen device.

*Image allows you to select an image file of your signature.
5. Drag, resize, and position the signature inside your PDF file.