

PENNSYLVANIA STATE GRANT PROGRAM HANDBOOK

2019-20 ACADEMIC YEAR & 2020 SUMMER TERM

Q&A



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PENNSYLVANIA STATE GRANT PROGRAM HANDBOOK Q&A

The purpose of this document is to provide the financial aid community with responses to questions that were addressed during the 2019-20 State Grant Summer Workshops. Information is being shared for clarification purposes only. This document supplements the *2019-20 Academic Year and 2020 Summer Pennsylvania State Grant Program Handbook*.

The organization of questions presented in this document follows the order of the *PA State Grant Handbook*. Sections are noted for cross-referencing purposes.

We appreciate any comments that you have on the *PA State Grant Program Handbook* as we revise the text annually based on questions and feedback from the financial aid community. Please write us at sghelp@pheaa.org if you have suggestions on enhancements for the *PA State Grant Handbook*.

CHAPTER 1 – SCHOOL & PROGRAM ELIGIBILITY

SECTION A, SCHOOL ELIGIBILITY REQUIREMENTS

Q: How should we communicate that we have a new president?

A: If your institution has a new president, please contact us by emailing information to Institution Eligibility at sginstitutioneligibility@pheaa.org.

SECTION C, APPROVED PROGRAM OF STUDY

Q: Can you please explain what “online program” means?

A: As noted in Chapter 1, Section C of the *PA State Grant Handbook*, an online program is one that is structured so that all coursework is primarily taken online though the individual student may have the opportunity to enroll in some classroom courses. These programs are ineligible for a PA State Grant award at Non-HQD institutions due to the inherent inability to comply with the program structure minimum defined in that section of the *PA State Grant Handbook*. For additional information on how to classify a course or program as “online” as it relates to student eligibility, please refer to Chapter 2, Sections A and B.

SECTION E, TERM LENGTH

The following questions are related to the module example illustrated in the workshops.

Example presented in the workshop: Peter P. is attending PHEAA University, a semester institution. He is awarded a half-time PA State Grant and enrolled in “Term A” for 9 credits when the fall term disbursement roster is sent on August 18. School records indicate that he is registered for an additional 3 credits in “Term J.”

Example bonus question and answer presented in the workshop: If he withdraws from 3 credits during “Term A,” how is his eligibility impacted when the award is credited? When the award is credited at the start of “Term J,” Peter’s enrollment status will be based on the total number of credits from both modules (12), minus the withdrawn credits (3). Due to Peter’s withdrawal, he would now be considered for a half-time award.

TERM & MODULE EXAMPLE

Term A - 15 Weeks							
Term B - 7.5 Weeks				Term C - 7.5 Weeks			
Term D - 5 Weeks			Term E - 5 Weeks			Term F - 5 Weeks	
Term G - 3 Weeks		Term H - 3 Weeks		Term I - 3 Weeks		Term J - 3 Weeks	Term K - 3 Weeks
Term L - 2 Weeks	Term M - 2 Weeks	Term N - 2 Weeks	Term O - 2 Weeks	Term P - 2 Weeks	Term Q - 2 Weeks	Term R - 2 Weeks	Term S - 1 Week

Q: Can we credit the half-time award at the start of the 15-week term and then increase his enrollment when the module “Term J” begins?

A: No. Since at the time enrollment and eligibility is initially reviewed, Peter has scheduled enrollment in “Term J,” your school must wait to credit the award until the start of the “Term J” module. Even though Peter has a course that satisfies the term length requirement, his enrollment is still considered modular.

Q: Since our business office is charging the student full-time costs due to the additional enrollment in the modular term, why can’t we credit the half-time award at the start of the semester and credit the remainder after “Term J” begins to avoid the student having to cover the costs upfront?

A: Since the student is scheduled as full-time at the start of the term but will not achieve the full-time status until the start of “Term J,” a partial award (half-time) cannot be credited upfront.

Q: Could you please clarify what it means to combine modules? The language in Chapter 1 states that schools have to wait to credit if combining modules. Since Peter was enrolled in credits across the full-term, we technically aren’t combining modules to meet the term length requirement.

A: The impact of a student’s modular enrollment must always be considered prior to crediting. Because of this, every term listed in the chart provided on page 10 of the *PA State Grant Handbook* is considered modular. If the student is only enrolled in “Term A,” then crediting may be done at the start of the term.

Q: If Peter was not initially enrolled in the “Term J” module until later in the term, we could credit the half-time award at the start of the term, correct?

A: Yes. In this case, Peter meets the term length requirement (15 weeks) as well as the half-time enrollment status at the beginning of the term so he is eligible to have his half-time award credited. If, in this scenario, Peter enrolls in “Term J” after the semester has begun and his half-time award has been disbursed and credited, his award may be increased to a full-time award and credited after enrollment is confirmed when “Term J” begins. Additionally, schools must be able to document the date those credits were added, and the enrollment mode must be reviewed and adjusted, if necessary.

Q: Must we withhold crediting from students who are only enrolled in “Term A” if we have other students enrolled in “Term A” and additional terms (modules)?

A: No. If the student is only enrolled in “Term A,” then crediting may be done at the start of the term.

Q: Just to clarify, if the student’s enrollment does not change based on the later module, can we credit at the start of the term? For example, at the start of the term, the student is enrolled in 6 credits in “Term A” and 3 credits in “Term J.”

A: No. Since the student is enrolled in “Term A” and “Term J,” you are required to wait to credit until after “Term J” has begun.

Q: Our entire freshmen class is placed into a modular enrollment situation where they enroll in 12 credits across the term with a 3-credit modular course that starts later. So to confirm, I cannot credit the award until the modular course begins?

A: The impact of a student's modular enrollment must always be considered prior to crediting. Because of this, every term listed in the chart provided on page 10 of the *PA State Grant Handbook* is considered modular. Your school is required to wait until the final modular course begins to credit the award.

Q: Do the same crediting rules apply to the summer term?

A: Yes, crediting rules apply to all terms.

CHAPTER 2 – STUDENT CERTIFICATION OF ELIGIBILITY

SECTION A, APPROVED PROGRAM OF STUDY

Q: The US Department of Education states that only courses that apply toward the student's program of study (declared major and minor, if applicable) may be included in the enrollment status used to determine eligibility for Federal Aid. Does the PA State Grant Program follow the Federal definition for enrollment in "courses applicable to the degree or program objective," as written in Chapter 2, Section B, paragraph 1 of the *PA State Grant Handbook*?

A: No. For PA State Grant purposes, the Program of Study or "degree or program objective" refers to the overarching 2-year or 4-year degree and is not specific to the student's declared major or minor unless the student is attending a business, trade, or technical school. This may mean that the student has a different enrollment status from what was used to determine Federal Aid. Please review Chapter 2, Section B for additional information on enrollments not eligible for the PA State Grant Program.

SECTION B.2, ENROLLMENT, INSTRUCTION DELIVERY & ENROLLMENT MODE REPORTING

Q: Is there a deadline for enrollment mode reporting?

A: Enrollment mode is an item required to certify eligibility just like enrollment status (e.g., half-time, full-time). There is no specific deadline for enrollment mode reporting, as it should be reviewed throughout the term as needed. You should confirm that your enrollment mode reporting is completed by the time annual reconciliation begins. Reporting enrollment mode as soon as possible aids PHEAA in future spending projections.

Q: Within the *PA State Grant Handbook*, could we see the same enrollment mode terminology used (e.g., mode 1, mode 2, etc.)?

A: Yes. We've tried to avoid using codes in favor of descriptive language. However, it does seem warranted in this case to add those mode numbers to these descriptions, and we will consider that suggestion for future publications.

SECTION B.5, ENROLLMENT, REMEDIAL/DEVELOPMENTAL COURSES

Q: Could you please clarify the "Carol D." example.

A: There were errors made with this example in some of the workshops. The slide should have shown as below. In this corrected example, the student would not require a remedial exception since she is ineligible for not showing enough financial need. At the time of the "Reject M," the student's record status displayed as "Complete/Active." Your school should report the student's correct enrollment as "Less than half-time"

which will cause the record to become ineligible "Reject I" and move it to the "Complete/Reject" category. In summary, please do not report a remedial exception for a term where the student is not eligible.

Please refer to the updated 2019-20 PA State Grant Workshop Answer Key located under the PA State Grant section of the [SGSP Resources page](#).

Q: Can we report a remedial exception for a student who is awarded after the term has ended?

A: Yes. Since certification of eligibility is being completed for the first time after the term has ended, a remedial exception may be reported.

SECTION B.7, ENROLLMENT, EVENING & WEEKEND SCHEDULES

Q: Our school will be transitioning the evening program to an online program. How should the students be reported?

A: As noted in Section B, paragraph 7, if different educational costs for evening programs had been reported during the annual cost collection process, then you should continue to report enrollment as "Full-time Evening" or "Half-time Evening," as appropriate. However, if the costs were not previously reported and the students' online tuition and fee charges are at least 25% less than those used to calculate the students' awards at your school, then reporting of "cost overrides" is required. You must report enrollment mode for these students in the same manner you would for day students. If your school is classified as a Non-HQD school, you may be required to report these students as enrolled in a "DE" program of study.

SECTION B.10.C, ENROLLMENT, ENROLLMENT AT ANOTHER INSTITUTION, STUDY ABROAD

Q: Can students who study abroad during the summer receive a PA State Grant?

A: Yes; however, as with the academic year, you must take into consideration all the policies outlined in Chapter 2, Section B, paragraph 10 of the *PA State Grant Handbook*; including term length, start dates, different costs and having enrollment that is at least half-time.

SECTION D.2, ACADEMIC PROGRESS, EVALUATION BASICS

Q: If a student has not been able to provide transcripts from previous schools but has since earned 24 credits at our school, does the student pass the Satisfactory Academic Progress test despite the lack of transcripts?

A: Yes. For example, a student received two full-time awards for the 2016-17 Academic Year at School A but a Reject P shows on the record for the 2017-18 Academic Year at that same school. The student transferred to School B in 2018-19 but did not provide transcript information. The student earned 24 credits at School B. Since the student earned sufficient credits in 2018-19 to cover a deficit for the two full-time awards from 2016-17, School B will not need a prior institution transcript to credit awards for the 2019-20 year. Please refer to Chapter 2, Section D, paragraph 4 of the *PA State Grant Handbook* for more information.

SECTION D.4, ACADEMIC PROGRESS, STUDENTS TRANSFERRING TO YOUR SCHOOL (NOT VISITING)

Q: If a student earns credits at another institution while simultaneously enrolled at my school but those credits do not count toward their degree at my school, can the credits be counted toward progress?

A: No. If the credits do not count toward the student's degree on their transcript, then the credits may not be counted toward Satisfactory Academic Progress.

Q: If a student attended multiple institutions prior to transferring to my school, how far back do we need to check progress?

A: Your school only needs to go back to the last award cycle where a PA State Grant was received. Any terms prior to that cycle are assumed to have been reviewed by the last awarded institution.

Q: Do all mid-year transfer students have to be checked the same way each time or could this be an individual approach?

A: Just as your school must declare when progress is checked (at the end of the Summer or Spring terms), your school must apply the checks for all mid-year transfers students consistently.

Q: In the workshop example for Wanda (please refer to the updated 2019-20 PA State Grant Workshop Answer Key on [PHEAA.org/training](https://pheaa.org/training)), if the school decides to conduct a full Satisfactory Academic Progress review, is it correct to reject the award for progress, since she didn't earn sufficient credits in Spring 2019?

A: No. During the yearly cycle, the student must complete the **total** minimum number of credits commensurate with PA State Grant enrollment for the total award counters received during the cycle. Wanda needed to earn 30 credits for the one half-time and two full-time awards she received during the cycle. Since she earned a total of 31 credits, she passed progress. Again, the Satisfactory Academic Progress standard for PA State Grant compares the total number of credits needed to the total number earned during the cycle.

Q: In the example for Wanda, how can the institution evaluate progress if the number of credits attempted is unknown for the Fall 2019 term? Wouldn't we need these credits to determine if her Spring award can be posted?

A: No. In the Wanda example, the student is a mid-year transfer so her first term of attendance at your institution is the Spring term. In her eligibility history, you can see that she had an award during the Fall 2019 term. Based upon this, your school has the choice to either perform a full Satisfactory Academic Progress review of the prior year or assume her Fall school performed the Academic Progress test. If you make the assumption that the Fall school accurately evaluated her progress, then you will want to print documentation showing that Wanda had a Fall term award. This documentation must be kept in her records.

SECTION D.5, ACADEMIC PROGRESS, CONSIDERATION OF REPEAT COURSES

Q: Is there anywhere that a student can find PHEAA's policy regarding credits earned for repeat courses?

A: Yes. The [State Grant Program's Rights and Responsibilities Certification Document](#) explains the Primary Eligibility Requirements including the Academic Progress policy and the treatment of credits earned for repeat courses.

SECTION D.6, ACADEMIC PROGRESS, CONSIDERATION OF REMEDIAL CREDITS

Q: I've had scenarios where the student is enrolled in 2 remedial courses and 3 regular courses. They fail one of the remedial courses at the end of the term. Could I go back and update the remedial credits so that the student does not become a progress reject?

A: No. This would be retroactive reporting and that is not permissible. Please refer to Chapter 2, Section B, paragraph d.i.

SECTION F, PENNSYLVANIA DOMICILE

Q: If we think a student's domicile is questionable and alert PHEAA, do we need to re-report this each year?

A: Your school would only need to report the domicile concern one time unless it appears that additional information has become available that may cause PHEAA to re-evaluate any prior eligibility decisions. When

reviewing a student's ability to meet the PA domicile requirement, staff takes into consideration all current, active application information as well as prior eligibility.

SECTION G, HIGH SCHOOL GRADUATION

Q: When a student has a foreign high school diploma, how can the student satisfy the PA State Grant requirement?

A: As noted in the *PA State Grant Handbook*, students may obtain a GED or submit a completed evaluation performed by one of the approved National Association of Credential Evaluation Services (NACES) organizations. The Pennsylvania Department of Education (PDE) also offers a 30 college credit option as a way to obtain a GED. You can learn more about the PDE options by visiting education.pa.gov/HSE.

SECTION H, CHANGES IN EXPECTED FAMILY CONTRIBUTION (EFC) & FEDERAL ELIGIBILITY

Q: If we make a professional judgment on the EFC, does PHEAA receive this update?

A: While PHEAA does receive an update to the Professional Judgment indicator from the FAFSA® and does receive an update to the EFC last calculated on the ISIR, the Federal EFC number from the FAFSA is not used to calculate PA State Grant eligibility. Additionally, as noted in Section H of the *PA State Grant Handbook*, the Professional Judgment indicator is not used by PHEAA to determine eligibility (although it is a factor that may be taken into consideration during PHEAA's financial independence review process.) PHEAA uses the Federal EFC formula only to calculate the EFC used for PA State Grant purposes. Students who require special consideration must contact PHEAA directly.

SECTION O, DIFFERENT EDUCATIONAL COSTS

Q: We are in a teach-out situation in which students are finishing up credits at a quarter term school and then coming to our school which is a semester school. The students are attending and being processed for aid at our school. However, they are being charged the prior institution's tuition and fees as part of the teach-out agreement. Do we need to submit cost override for each of these students?

A: If the student's tuition and fee charges are at least 25% less than those used to calculate the student's award at your school, then reporting is required.

Q: If the enrollment mode needs to be changed and a cost override also needs to be reported, which should be done first?

A: The enrollment mode reporting should be done first since the result may be a change in eligibility. Therefore, it is necessary to make all updates to enrollment, enrollment mode, etc. prior to submitting a cost override.

CHAPTER 3 – PENNSYLVANIA STATE GRANT COSTS & AWARD ADJUSTMENTS

SECTION A, EDUCATIONAL COSTS USED IN CALCULATING A PA STATE GRANT

Q: On the Eligibility Notice, are students advised that awards are conditional based upon the passage of the Commonwealth's budget?

A: Yes. On both the email and the Eligibility Notice that is placed in the student's paperless inbox in the student portal, there is messaging that advises students that their award is subject to change and that the student's school must certify eligibility. Additionally, there is a general portal alert that explains, "For those students who

have been determined eligible to receive an award, PHEAA is unable to finalize this information until the PA Commonwealth budget is passed. If the passing of the budget results in a change to your record, PHEAA will notify you via email and update Account Access.”

The student’s email explains:

“If awarded, your award is subject to change once funding is finalized by passage of the Commonwealth budget. Due to limited resources, students enrolled in more than 50% distance education credits may be eligible for a reduced award. If eligible, award money will be sent directly to your school. Your school will credit your account after first certifying your eligibility.”

Q: The revised 2019-20 Academic Year and 2020 Summer Term PA State Grant Handbook states that we cannot credit using the label “PHEAA Grant.” Are there any other changes we need to make?

A: In accordance with the *PA State Grant Handbook* guidance, your school should not refer to the PA State Grant as the “PHEAA Grant.” This means all external communications (award letters, school websites, etc.) must be updated as soon as possible.

Q: If a student withdraws from credits in the first module, how does this impact eligibility when the award is credited in the final module?

A: The modular withdrawal policy requires that you take into consideration the total credits minus the withdrawn credits before crediting any awards. For additional information, please refer to Chapter 3, Section C, paragraph 4 of the *PA State Grant Handbook*.

SECTION C, AWARD ADJUSTMENTS FOR WITHDRAWALS, DROPS & ADDS

Q: If we freeze our students for Federal Aid and don’t check enrollment after this period, do we need to continue to check enrollment for PA State Grants?

A: Yes. Regardless of what point in the term schedule changes occur, you would need to check and update their enrollment accordingly for PA State Grant purposes. Amounts credited should coincide with the students’ final enrollment used for eligibility determination.

Q: How should we report if a student withdraws and decides to refuse the award?

A: You should follow the Student Refusals guidance in Chapter 2, Section M of the *PA State Grant Handbook*. The PA State Grant record will be cancelled by PHEAA staff for the reason “R” (refusal).

Q: We have an accelerated program and students can enroll in two 8-week sessions for 6 credits each. What happens if a student initiates the term and withdraws from the first 6-credit module and doubles up for 12 credits in the final module?

A: As noted in the chart in Section C, paragraph 4, if the student withdraws from one or more modules which results in the student still maintaining a full-time enrollment status, the student maintains a full-time State Grant award. The student may be paid at the beginning of the last module in the term.

Q: The definition of withdrawal says that there are charges and attempted credits remaining for the student. When a student at our school does not drop by the first day of classes, we charge them a portion of the tuition from those courses but there are no credits. Is this considered a drop or a withdrawal?

A: The attempted credits must appear on the transcript in order to meet the withdrawal definition, as noted in Chapter 3, Section C of the *PA State Grant Handbook*. In this example, the attempted credits do not appear on the transcript; therefore, you must consider this a drop and may not apply the withdrawal procedures.

CHAPTER 4 – DISBURSEMENTS & CASH MANAGEMENT

SECTION C, DEFINING DISBURSEMENT ROSTERS, DISBURSEMENT ROSTER AVAILABILITY & FUNDS AVAILABILITY

Q: How often does the State Grant College Disbursement display, FG3S, get updated?

A: FG3S is refreshed nightly, Monday through Friday, so that you have updated information daily.

Q: Are the Special Programs' roster deadlines consistent with the PA State Grant Program?

A: No. Each program has different roster and refund return policies. You will want to review the specific Program Guidelines/Certification Procedures to determine when rosters and refunds should be returned.

Q: Is there a report generated by PHEAA that only contains students that have changed eligibility since the last reconciliation roster was generated?

A: No. Even though a student may have been verified on the previous reconciliation roster, PHEAA still requires that your records for 100% of the students must match the information listed on the final reconciliation roster. As part of reviewing additional reconciliation rosters, you can also consider these resources:

- search for changed students who are marked with an asterisk on the roster; and/or
- review the GPAD reports; and/or
- filter in Partner Interface using the eligibility date ranges.

Q: Can you explain what a disbursement adjustment percentage is and how it is calculated?

A: The disbursement adjustment percentage is a 3-year average of the portion of funds needed to pay PA State Grant awarded students out of the total amount initially calculated to be disbursed to a school. For instance, if a school was initially calculated to receive \$100,000 in PA State Grant funds for eligible students, but for the last three years, due to reductions in student eligibility, only about 76% of the funds were actually used to pay eligible students, then 76% of the \$100,000 (or \$76,000) would be disbursed. The remaining funds, if needed, would be disbursed with the first reconciliation roster. However, if, by the conclusion of reconciliation, less than \$76,000 was needed, then this would contribute to a reduction in the school's adjustment percentage calculated for the following year.

Q: How can a school get a higher disbursement adjustment percentage?

A: A best practice for increasing your disbursement adjustment percentage is maintaining control of the timeliness of the changes submitted to the PA State Grant Program. Since we base the adjustment percentage on the amount of funds returned to PHEAA and your overall disbursed volume, it will reduce overpayments if your school can complete your changes prior to disbursements. This, in turn, may increase your adjustment percentage. Please keep in mind that it is a 3-year average so one year of timely changes will not mean an increased percentage the following year.

Q: How does waiting to credit until the final module impact the 45-day deadline for returning regular rosters?

A: As footnoted in Chapter 4, Section C of the *PA State Grant Handbook*, if a school has multiple start dates within a term and the latest start date does not permit the return of the certified disbursement roster within the 45-day window, the school must certify within 45 days after the last start date.

SECTION D, CREDITING

Q: If the student is a PHEAA Collectable or a PHEAA Offset, is the counter assessed?

A: Yes. Award counters are assessed in cases where students owe funds back to PHEAA either by direct payment or PHEAA Offset of a future term. These students received funding and should be considered as “awarded” when applying PA State Grant policies such as academic progress in future terms.

CHAPTER 5 – PROGRAM REVIEW & AUDIT FINDINGS

SECTION A, OVERVIEW

Q: How is the *PA State Grant Handbook* used with regard to a Program Review?

A: Program reviews are conducted in accordance with the policies outlined in the *PA State Grant Handbook* for the year and/or summer term being reviewed in conjunction with any annual Special Crediting Instructions which may have been issued to your institution. If you have Special Crediting or other guidance that does not reference the academic year (or applicable summer term), please contact us for an update.

SECTION F, PROGRAM REVIEW & AUDIT FINDINGS

Q: Will my school receive an administrative finding or a disbursement hold if we have an outstanding roster or refund after the reconciliation deadline?

A: Your school will not receive an administrative finding if there is an outstanding roster or refund after the reconciliation deadline as long as the roster is returned within 30 days of the roster generation (print) date and refunds are returned within 60 days of the roster generation (print) date. However, your school will be placed on a disbursement hold for future terms if the school is out of balance after the reconciliation deadline.

MISCELLANEOUS

Q: Is there a way to report “Not Enrolled” for incomplete or ineligible students in Partner Interface so that these students are removed from my school listings?

A: Currently, there is no way for you to remove students who are incomplete or ineligible from your listings since marking a student “not enrolled” means that they were complete with funds at your institution for the entire academic year. Our technical team is currently working toward a solution that will allow you to move these students to a “not enrolled” listing. If and when these future enhancements are made, you will be provided with information on the revised process.

Q: What is the best way to find specific topics in the *PA State Grant Handbook*?

A: With the online version of the *PA State Grant Handbook*, you can use the “find” (Control + F) function to locate specific words or phrases related to the topic in which you are interested. The “Summary of Post-Workshop Corrections” and “Summary of Changes” are useful sections when you need to compare policies from one year to the next. In addition, there are various hyperlinks within the text that allow you to toggle to related sections for a specific topic.

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