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The purpose of this document is to provide the financial aid community with responses to questions that were addressed during the 2022-23 PA State Grant Summer Workshops. Information is being shared for clarification purposes only. This document supplements the “2022-23 Academic Year and 2023 Summer PA State Grant Handbook.” Refer to PHEAA.org where you can access the most recent updates, including FAQs for the PA State Grant Program.

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 Handbook” as we revise the text annually based on questions and feedback from the financial aid community. If you have suggestions on enhancements for the “PA State Grant Handbook,” email us at sghelp@pheaa.org.

Chapter 1 – School & Program Eligibility

Section I.H, School Eligibility Requirements

Administrative Requirements

Q: Does the PA State Grant Program have guidelines on the ratio of staff to student volume to help justify staffing needs?

A: PHEAA does not provide a recommendation of the specific number of staff needed to manage programs. The number can vary greatly from school to school taking into account the volume of applicants, recipients, and the number of PHEAA-administered programs in which the school participates. Financial Aid Offices are expected to be staffed sufficiently that a program can be accurately managed within the guidelines and time frames provided.

Sections III.A, Approved Program of Study

Reporting New or Changed Programs

Q: If our school has a change to a previously PHEAA-approved program of study, what is the deadline for submitting the changed information?

A: When a school determines that a previously PHEAA-approved program of study is changing, PHEAA must be notified immediately. At the latest, program of study changes must be reported according to the same deadlines established for other institutional changes. This means prior to May 1 for the summer term (e.g., prior to May 1, 2023 for the 2023 Summer term) and prior to August 1 for the academic year (e.g., prior to August 1, 2022 for the 2022-23 Academic Year). If the changes have been implemented, the school must suspend processing for those programs until PHEAA Institution Eligibility can confirm that the program continues to meet requirements. PHEAA may place the institution on hold if the change is not reported until after it has been implemented, to allow time for review of the program’s eligibility. Unreported program of study changes may lead to repayment of all disbursed funds and Program Review findings.
Section V.A, Term Length

Academic Year Term Length Definitions

Q: A student is enrolled in a summer session which runs from June 9, 2022 to July 13, 2022. Does this time period meet the five-week summer term minimum requirement?

A: A week of instructional time is any period of 7 consecutive days in which at least 1 day of regularly scheduled instruction or examination or (after the last day of classes) at least 1 scheduled day of study for examinations occurs. In this example, the summer term begins on Thursday, June 9, 2022 and the first week of enrollment ends on Wednesday, June 15, 2022, with no week-long breaks. This means that the fifth week begins on July 7, 2022 where at least 1 day of regularly scheduled instruction is required. Since 5 weeks is the minimum term length for non-year-round programs, the student enrolled during this time would potentially qualify for a summer PA State Grant award.

Section V.E, Term Length

Summer Term Length Definitions

Q: My school has traditional terms but also offers certain programs that are continuous enrollment. Are students in the continuous enrollment programs eligible for a summer term payment after 5 weeks?

A: Eligibility for a summer term payment is dependent upon the program structure in which the student is enrolled (i.e., non-continuous or continuous enrollment). For example, any semester student enrolled in a continuous program must meet the regular semester term length requirements (15-17 weeks) in order to be eligible for a summer term payment. Only students enrolled in a traditional, non-continuous program may receive a summer term payment for 5 weeks of enrollment.

Chapter 2 – Student Certification of Eligibility

Section III.B, Undergraduate Status

Undergraduate Enrollment in Graduate & Professional Courses

Q: If a student is not eligible for a federal Pell Grant, does that mean they do not meet the undergraduate definition for a PA State Grant?

A: There are a variety of reasons that a student may be ineligible for a federal Pell Grant. A student could be ineligible for a federal Pell Grant but still be PA State Grant eligible. Ineligibility for a federal Pell Grant due to graduate status means that the student is not eligible for a PA State Grant.
Section IV.B, Academic Progress

Evaluation Basics

Q: What do you recommend to students who cannot obtain a transcript due to the closure of their former school?

A: Students can reach out to the Pennsylvania Department of Education (PDE) or U.S. Department of Education (ED) to find out where the closed school records are being held. Records are usually held at another institution but can be held by the Department of Education.

Q: When students are initially determined to be PA State Grant ineligible due to academic progress (reject “P”) and are later academically dismissed by the school, are any updates required?

A: Yes. In addition to the academic progress reject, students in this situation should be updated to “not enrolled.” This can be done by using the cancellation feature in Partner Interface or via Certification Transmissions.

Section IV.D, Academic Progress

Students Transferring to Your School (Not Visiting)

Q: We have a student’s transcript from the American Council on Education (ACE) Working Transcript with credits issued by SOPHIA learning. Can these credits be counted toward academic progress?

A: No. Postsecondary institutions granting credits must offer degrees and credits must be earned at a PA State Grant approved or federal Title IV-eligible postsecondary institution.

Q: My school has a transfer student that had a full-time PA State Grant during the Spring 2017 term. The student attended a different approved school but did not receive any PA State Grant during the 2019 Spring term and 2021-22 Academic Year. We have no transcript to cover the Spring 2017 term but do have a transcript from the second school showing completion of 33 credits. Is the student okay for progress?

A: With no transcript you would assume the student had a full-time credit deficit (12 semester credits) because they received a full-time grant at the first institution. Since the student completed 33 credits after that time at an approved institution without receiving any PA State Grant, the student has made satisfactory progress.

Q: My school reviews progress after the summer term. Do we need to check if students made academic progress before awarding summer?

A: For non-transfer students, you do not need to check progress until your normal cycle. For transfer students, please refer to Page 62 of the “PA State Grant Handbook.”

- If the student received a fall, winter, and/or spring PA State Grant award immediately preceding the summer for which they transferred to your school, do not check progress until your normal progress review cycle occurs (i.e., after summer). The progress review is held until after summer since the student received either a fall, winter, or spring PA State Grant award during the academic year. By receiving this award, the student was cleared for that academic year payment and, therefore, is eligible for the summer payment. Evaluation of credits for the summer term will then occur with your normal cycle.

- If the student did not receive a fall, winter, and/or spring PA State Grant award immediately preceding the summer for which they transferred to your school, you must review progress immediately before crediting the summer award.

Q: Does the updated “Transfers After the Summer Term (Students Starting in Fall)” policy apply to the Fall 2022 term or is there a delay since the Summer 2022 term is aligned with the “2021-22 PA State Grant Handbook?”

A: The new policy applies to the Fall 2022 term. Schools evaluating students for progress for Fall 2022 must follow the new policy.
Q: If a fall transfer student is awarded a fall PA State Grant at a summer header school and their last award was prior to Summer 2022, is a progress check required?

A: Yes, if the student received their last award prior to Summer 2022, you must review progress before you award Fall 2022.

Q: For students who transfer in the fall, must my school check progress immediately?

A: The new school does not have to check for progress immediately upon transfer if all of the following apply:

- The student is transferring, starting with the fall semester/quarter
- Your school's normal cycle is to check progress after spring
- The student received a summer award at the previous school for the summer immediately preceding the fall for which the student transferred to your school

The new school must check progress if the student did not have a summer award or if any of the above three points do not apply.

Transfer After the Summer Term (Students Starting in Fall) Examples

<table>
<thead>
<tr>
<th>Fall 2021</th>
<th>Spring 2022</th>
<th>Summer 2022</th>
<th>Fall 2022</th>
<th>Spring 2023</th>
<th>Action*</th>
</tr>
</thead>
<tbody>
<tr>
<td>School A</td>
<td>School A</td>
<td>School A</td>
<td>School B</td>
<td>School B</td>
<td>Check progress after the Spring 2023 term and include Summer 2022, Fall 2022, and Spring 2023 in the evaluation.</td>
</tr>
<tr>
<td>School A</td>
<td>School A</td>
<td>Not Enrolled</td>
<td>School B</td>
<td>School B</td>
<td>Check progress before crediting the Fall 2022 award.</td>
</tr>
</tbody>
</table>

* Assumes school checks progress after the spring term.

Q: If a transfer student enrolls for the fall term and our school reviews progress after spring (summer header), are we permitted to credit the fall PA State Grant without a progress review?

A: This is dependent on if the student received a 2022 Summer PA State Grant. If the student did receive a Summer 2022 PA State Grant, effective with the 2022-23 Academic Year, schools that normally check progress after spring do not have to review progress for students who transfer during the fall term until the after the following spring. Students who transfer mid-year (after fall) may still require a review. Please refer to Page 60 of the “PA State Grant Handbook,” both “Transfers After the Summer Term (Students Starting in Fall)” and “Mid-Year Transfers (Students Starting in Winter or Spring).” If the student did not receive a Summer 2022 PA State Grant, the school must check progress, as they normally would before certifying a 2022 Fall term award.
Section IV.H, Academic Progress

Exceptions

**Q:** Is there a limit to the number of times a student can appeal an academic progress failure?

**A:** The PA State Grant Program does not limit the number of times that a student can be granted an Academic Progress exception. However, it is important to keep in mind that progress must be met for the excepted term for the student to maintain eligibility. Students cannot be granted additional exceptions for ongoing medical conditions. Exceptions to excepted terms are generally not granted and only in the rarest cases would be escalated to PHEAA's Administrative Review Committee for consideration.

**Example**

A student does not meet progress for the Fall 2022 term due to a documented medical hospitalization that resulted in a failure to earn Spring 2022 credits. The student is granted a progress exception for the Fall 2022 term and, therefore, does not need to make up the Spring 2022 credit deficit. However, if the student fails to earn sufficient credits for the Fall 2022 PA State Grant, the Spring 2023 term must be rejected for progress.

Section VI.A, Pennsylvania Domicile

**Definition**

**Q:** Do students have to be a Pennsylvania resident for 12 months prior to filing the application or prior to the FAFSA® application deadline?

**A:** While the regulation defines that residency must be met prior to the date of application filing, long-standing policy allows for the requirement to be met in relation to the applicable filing deadline to allow students to file applications early without being penalized. For example, a student who moved to Pennsylvania on March 31, 2021 and filed their 2022-23 application on October 1, 2021 meets the requirement since they will have resided in Pennsylvania for 12 consecutive months prior to the May 1, 2022 PA State Grant filing deadline.

Section IX.B, Student Identification Corrections

**Name Changes & Discrepancies**

**Q:** How should name discrepancies be reported to PHEAA

**A:** Name discrepancies must be reported to PHEAA using the Special Request feature in Partner Interface. Once reported, PHEAA will require two forms of legal documentation that contain the student's name to be submitted and will reach out directly to the student regarding the required acceptable documentation. Final award crediting must be withheld until the name change has been resolved.

Section XIV, Student Reconsideration Deadlines

**Q:** Can I request a student be updated to my school after the April 1 reconsideration deadline?

**A:** While you can make the request, you should be aware that it will only be processed if the student's PA State Grant record was in a complete status prior to April 1. For example, if a student's 2022-23 PA State Grant record was complete prior to April 1, 2023 but the student was canceled as not enrolled at School A, we are able to update the student's record to enrolled at your institution. However, if the request is made after April 1 and the student's record is incomplete, PHEAA will not allow the update unless there were documented requests and responses within the allowable time frames outlined in the “PA State Grant Handbook.”
Section XV.A, Different Educational Costs

Requirements

Q: If a student has increased tuition that is greater than 25 percent of the PHEAA-approved tuition and our school does not report this, is this an administrative finding?

A: No. Reporting individual student tuition that exceeds PHEAA-approved tuition by more than 25 percent is optional and, therefore, would not be an administrative finding.

Q: How do I calculate a threshold for the summer term?

A: The costs on the FG4B transaction, available in OC/WebConnect, represent annualized costs used in calculating PA State Grant eligibility. The PA State Grant Need Analysis formula uses full year costs to determine awards for individual terms. For example, if PHEAA-approved tuition and fees for the summer term are annualized at $21,674, then the summer term threshold is calculated as follows:

- \[ \text{Threshold} = \frac{21,674 \times 0.75}{2} = 16,255/2 \text{ (semester school)} = 8,127 \text{ (truncated, not rounded)} \]

Chapter 3 – PA State Grant Costs & Award Adjustments

Section III.E, Award Adjustments for Adds, Drops, & Withdrawals

Evaluating Withdrawals in a Modular Term

Q: A student is enrolled in six credits spanning a 16-week semester and six modular credits beginning later in the term. Prior to crediting, the student withdraws from the six non-modular credits. Would the student still be eligible for a half-time award?

A: Yes. Because the student initiated enrollment in a semester that met the minimum term length requirement and credits will show on the transcript, the student meets the term length and half-time enrollment requirements.

Chapter 4 – Disbursements & Cash Management

Section III.A, Defining Disbursement Rosters, Disbursement Roster Availability, & Funds Availability

Pre-Disbursement Roster

Q: After corrections are made based upon the pre-disbursement roster, what are the next steps in the disbursement process?

A: Pre-disbursement rosters are only sent once per term in order to conduct an enrollment and eligibility clean-up prior to the disbursement of funds. After corrections are made, the pre-disbursement roster must be certified in order to allow a term disbursement roster with funds to be generated. Certifying the pre-disbursement roster confirms that you have made all the necessary updates to students who appeared on that roster. Updates to students’ records after the certification of the pre-disbursement roster are permitted and the results of those changes will be reflected on future rosters.

Q: My school is Non-HQD and enrollment fluctuates through the add/drop period. Should we hold the pre-disbursement roster until after drop/add since many of those students will have enrollment modes rendering them ineligible due to the 50% in-classroom requirement?

A: Ultimately it is your school’s decision to hold off on returning the pre-disbursement roster. Keep in mind that a term roster with funds will not generate until the pre-disbursement roster is certified. Students are then
delayed in receiving PA State Grant awards and should be made aware that this is not because of PHEAA’s inaction. If the decision is made to delay pre-disbursement roster certification, you should still continue to make enrollment mode updates for all students as soon as possible. The ADA accommodation allows students 30 days to reply once letters are generated (refer to Page 36 of the “PA State Grant Handbook”). Schools can use the Financial Aid Administrator (FAA) Status Listing and Partner Interface to identify students who may have not been on the pre-disbursement roster. Waiting may reduce the risk of over-disbursement and an administrative finding for “Large percentage change (50 percent or greater) in total grant disbursements from initial disbursement roster” (refer to Page 121 of the “PA State Grant Handbook”).

Section IV.A, Crediting

General Crediting Requirements

Q: If my school credited a half-time PA State Grant and the student subsequently adds a module that makes them full-time, what action must be taken?

A: As noted on Page 105 of the “PA State Grant Handbook,” in instances where crediting occurred prior to the student’s registration for a later module, when the module begins, it will require a review. The modular credits may impact enrollment status, enrollment mode, remedial reporting, costs, etc. Therefore, adjustments to reflect the appropriate enrollment and eligibility may be required.

Q: If a student starts in a later module, should the PA State Grant be credited as soon as the class starts or should we wait until after the drop/add period for that module?

A: You can credit the award as soon as the final module begins, then apply add/drop procedures accordingly, or you can wait until that add/drop period is over. That is up to your institution. The key point is to not credit before the start of that final module. However, waiting to credit until after add/drop may put your students at a disadvantage since they will not be permitted to keep any funds in the case of a withdrawal. If the student has charges remaining, they will not be able to take advantage of using an adjusted PA State Grant award to help cover those costs.

Q: What documentation should be kept if we are certifying a disbursement roster later in the term due to modules?

A: A copy of the academic calendar with all possible start dates for each term is sufficient documentation to keep on record.

Section V.F, Excess Cash, Netting Process, & Refunds

Refunds to PHEAA

Q: When sending a refund, do I just designate the funds as “PHEAA funds“ or should I also include the program?

A: While you are designating PHEAA as the payee, the identification of funds being returned should specify the program such as “PA State Grant,” “Chafee,” etc. as well as the specific academic year or summer term. You should also send an email to sghelp@pheaa.org to notify us that the PA State Grant refund is in process. Please refer to the guidance provided on Page 117 of the “PA State Grant Handbook” for additional details.

Section VII.B, Financial Responsibility & Program Integrity

PHEAA Roster & Disbursement Holds

Q: What are the consequences of returning a spring pre-disbursement roster but not returning the fall?

A: All pre-disbursement rosters must be returned, even if the term has ended, before a disbursement can be made. As noted in the “PA State Grant Handbook,” outstanding fall pre-disbursement rosters do not prevent subsequent term pre-disbursement rosters (winter or spring). However, it should be noted that if
an institution returns a spring pre-disbursement roster but does not return the fall pre-disbursement roster, this will prevent a regular disbursement with funds.

Section VII.E, Financial Responsibility & Program Integrity

Retention of Records

Q: What specific information must be kept on file for 5 years?

A: While it is not possible to provide an exhaustive list, as noted on Page 121 of the “PA State Grant Handbook,” PHEAA requires the following:

- Documentation that supports the student’s ability to meet all eligibility requirements
- The date and amount of each credit of PA State Grant funds
- The payment of any overpayment or return of PA State Grant funds
- Other information such as student authorizations for PA State Grant award refusals and requests for additional terms of aid

Other information also includes any financial and accounting records that reflect PA State Grant Program transactions, as required on Page 91 of the “PA State Grant Handbook.”

Q: Should a hard copy of reconciliation rosters be kept in our school’s office for program reviews?

A: Keeping a hard copy of the clean reconciliation roster is your school’s choice. Reconciliation rosters remain accessible in the PageCenter report repository.

Miscellaneous

Q: What students are included on the GAPS Renewals report?

A: The GAPS Renewals report includes students:

- Who had an award greater than zero in the prior year spring term and did not already exhaust their 4.0 lifetime award counter; and
- Whose prior year academic level was not a year 4 or greater

Q: Why do I see the message “There is no Eligibility Information to display” for certain students on the Eligibility Summary section of Partner Interface?

A: If a student’s record is not in a complete or rejected status, then a relationship to the school cannot be established for history file purposes. The eligibility summary is guarded to ensure that the school has a relationship with the student in order to allow display of the history of prior year PA State Grant information at other institutions.

Q: Other than first-time students, who may need to complete a PA State Grant Form (SGF)?

A: The SGF is required for all students who do not have a complete prior year PA State Grant record from which information can be carried over into the current academic year record. For example, students who have attended school in the past but did not have a complete prior year PA State Grant record at the time they applied for the current year are required to complete the form. For additional examples, refer to the “PA State Grant Program Incomplete Notifications Guide and Q&A.”

Q: Are student letters and emails available in the student portal?

A: Letters sent to students are not currently available in the student portal. Financial Aid Administrators can advise the student of the subject matter of a letter or email that was sent to the student by reviewing the
student's activity in Partner Interface. Other resources for assisting students are available in the “PA State Grant Handbook,” Appendix G (Determining Students' Status & Providing Assistance).

As a reminder, students should be encouraged to use the portal to:

• Review their status and PA State Grant eligibility
• Complete the PA State Grant Form
• Complete a PA State Grant Summer application
• Update address and enrollment information
• Upload documents

Q: If a student has a PA State Grant record that is marked as “not an applicant” and they answered graduate student questions in error, how should they correct?

A: Students who answered the graduate student questions incorrectly should be advised to return to the FAFSA and make the corrections. More information about how to identify these records in Partner Interface is located in Appendix G, Section I.A, paragraph iv of the “PA State Grant Handbook.”
The Pennsylvania Higher Education Assistance Agency (PHEAA) was created by the Pennsylvania General Assembly in 1963 to provide affordable access to higher education for PA students and families. Through the years, PHEAA has evolved into one of the nation’s leading providers of student financial aid services, including the Commonwealth’s first state-based student loan program – PA Forward. PHEAA also serves millions of students through guaranty, servicing, financial aid processing, and other programs.

PHEAA’s earnings are used to support the Agency’s public service mission and to pay operating costs, including the administration of the PA State Grant Program and other state-funded student aid programs. This contribution from PHEAA saves the Commonwealth millions of dollars each year. PHEAA continues to devote energy, resources, and imagination to developing innovative ways to ease the financial burden of higher education for students, families, schools, and taxpayers.

PHEAA conducts student loan servicing operations nationally as American Education Services (AES).

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