Is that course really eligible for aid?

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Regular Student- 34 CFR 600.2

To be eligible for Title IV funds, a student must be a regular student.

A regular student is defined as: “A person who is enrolled or accepted for enrollment at an institution for the purpose of obtaining a degree, certificate, or other recognized educational credential offered by that institution.”
Enrollment Status - 34 CFR 668.2(b)

...If a student is enrolled in courses that do not count toward his degree, certificate, or other recognized credential, they cannot be used to determine enrollment status unless they are eligible remedial courses.

This means you cannot award the student aid for classes that do not count toward his degree, certificate, or other recognized credential...not a new requirement.

Remedial Coursework - 34 CFR 668.20

...If the student is admitted into an eligible program and takes remedial coursework within that program, he can be considered a regular student, even if he is taking all remedial courses before taking any regular courses.

You may count up to one academic year’s worth of these courses in his enrollment status for federal aid. For the purpose of this limit, that is 30 semester or trimester hours.
Eligibility and enrollment status for retaking coursework - 34 CFR 668.2(b)

...The regulatory definition for an undergraduate full-time student has been revised to allow a student, in a term-based program only, to retake (one time only per previously passed course) any previously passed course.

For this purpose, passed means any grade higher than an “F,” regardless of any school or program policy requiring a higher qualitative grade or measure to have been considered to have passed the course (e.g., C in English).

To be eligible for financial aid:

▶ The **institution** must be eligible,
▶ The **program of study** must be eligible,
▶ The **student** must be eligible, and
▶ The **courses** must be eligible.
Problem areas at NOVA:

- Courses in programs of study that almost always require prerequisites that are NOT in the programs of study (hidden prerequisites); prerequisites put programs over the max credits allowed by VCCS

- Programs that require numerous courses before students can be admitted to the programs

- Senior institutions who require courses above two-year programs to be admitted to specific four-year programs; senior institution requirements not all the same
Coursework outside of program

Three possible ways to pay...

- **Remedial coursework** - Reg 668.20 defines remedial instruction as “designed to increase the ability of a student to pursue a course of study leading to a certificate or degree.” The student must be admitted as a regular student and is eligible for all Title IV aid. Remedial coursework cannot be below the secondary level and is limited to one year’s worth (30 credit hours).

- **Preparatory coursework** - The student must satisfy coursework before being admitted as a regular student. Limited to 12 months, eligibility only for Direct Loans.

- **Prerequisite coursework** - Prerequisite coursework is tricky, because it can be either part of the normal program or in addition to it, depending on where the student is in satisfying degree requirements.

The issues

Prerequisite coursework financial aid eligibility is handled differently in different sectors:

- Students attending a 4-year university program generally have/need 120 credit hours; prerequisite coursework is usually within program and covered by financial aid.

- Programs at community colleges often have few electives within their programs; students are then forced to pay for prerequisite coursework required at the senior institution. Some stop attending, do not complete their degrees and become “at risk” for student loan default.
What we’ve learned:

- Confusion exists as to how to fund prerequisite coursework, whether in the two-year academic program in which the student is currently enrolled or for transfer into a higher level program.

- State rules and institutional policies can impede attainment of students’ goals, and these impediments are sometimes confused with, but not always a result of, federal rules.

- Federal policy regarding prerequisite coursework is not clearly defined, but may afford more flexibility than is currently understood, especially in the context of classifying prerequisites as remedial coursework at the student level.
For some students, these prerequisite courses may be considered remedial coursework.

It is possible for a prerequisite course to be considered remedial in cases where the course could not otherwise be fitted into the student’s program. Note that this approach is meant to assist a student who could not graduate from his or her program without the course that required the prerequisite in question, and the prerequisite is not otherwise includable in the student’s program.
Initial accomplishment, cont.

ED has given this response to schools asking for guidance and at some meetings for a couple of years now; many schools remain unaware of this possible approach or do not realize that the same course may be considered remedial for some students but a regular elective/requirement for others.

Group recommendations

**Recommendation #1:**
Statutory Change through Reauthorization to amend the law to allow students who have completed a two-year degree but still need preparatory coursework to transfer into a 4-year program to receive no more than one scheduled Pell Grant award in addition to Direct Loans to complete the required coursework.
Recommendation #2:
Support efforts to encourage states to review policies that limit the credit content of associate degree programs, with a view towards increasing that limit for programs that prepare students for transfer into baccalaureate programs with greater than normal prerequisite coursework. [e.g., some sort of variable AA/AS degree could be approved that would accommodate differing requirements prerequisite to transfer for a number of academic major pathways, as determined by a two-year school in consultation with partnering four-year schools]

At its recent meeting, the NASFAA board approved moving both of these recommendations forward.
In the interim, as students register, NOVA financial aid encourages all students to:

- Review their program plans to make sure they are accurate,
- Run their advisement reports to see what classes are still needed for degree completion,
- Check the transfer guide for the receiving school if they are planning to transfer to make sure they are taking the correct courses for transfer,
- Use required electives wisely and, if possible, fill them with courses required by the transfer school, and
- Talk with their academic advisors to confirm their progress within their degree plans and to choose the correct courses.

NOVA financial aid encourages all students to:

- Take any additional courses needed for receiving schools on top of terms of at least 12 required credits, when possible, so aid is not reduced.
- Repeat courses needed for grade improvement BEFORE they complete all courses required for their programs of study, or those repeats cannot be covered.
- Know their financial aid statuses.
- Know the eligibility and enrollment-level requirements for each type of aid awarded.
Additional problem areas:

- Preparatory coursework (program prerequisites) whether required for admission in a NOVA program or for transfer, are not part of the program.

Students wanting to take additional classes at NOVA to save money before transferring must be in an eligible program at the receiving school, and

- The receiving school must be willing to sign a consortium agreement with NOVA that basically authorizes the student to take those classes through us. (I question whether Mason would do that and knowingly lose those additional credits.)

More Problem Areas:

- Even if excess financial aid exists, it cannot be used to pay for ineligible classes.

- Dual-enrolled students tend to take what is offered instead of what might be needed and could use up elective options before reaching us.

- Students have many class choices and don’t always choose what is needed.

- Many students seek no advisor and attempt to be their own.
Students may decide to take courses that do not apply to their programs of study.

If students choose to take courses that do not apply to their degrees or certificates at the same time in which they take courses that do apply toward their degrees or certificates, their aid will be prorated (reduced) to cover only the courses that apply.

Students will have to pay out of pocket for the courses that do not apply to their programs of study.

More Problem Areas:

- Students change their programs of study countless times, often without sound reasoning or a purpose.

- Students know they want to complete a bachelor’s degree, but the receiving school is yet unknown—as are, consequently, the required courses for the would-be transfer school.
Students may not be encouraged to enroll in programs just for financial aid.

We may not steer or automatically place students into a program for the purpose of receiving financial aid (includes transient students and students required to complete prerequisites).

NOVA’s FACA tool provides an opportunity for discussions that will assist advisors and students in making more appropriate course choices and ensuring students understand how their program of study and course selection align.

Advising and Placement

- Program placement and course selection should be intentional.
- Advisors should not advise students to “get into a program” for the sole purpose of receiving financial aid.
- Likewise, students should not pick up extra courses just to maintain a certain enrollment level, such as being half-time (for loans and certain forms of state aid or full-time for maximum aid and insurance purposes).
Students not receiving financial aid or veterans’ benefits can take whatever classes they want to take.

Students receiving financial aid and veterans’ benefits simply cannot, unless they pay out-of-pocket for them.

This is about taxpayer dollars and federal regulations, and these are not new rules!

Questions?

Solutions?