



NASFAA Title IV Eligibility Checklist: Considerations for Adding New Programs and Locations

The following chart represents a checklist guide to adding new academic programs and locations at postsecondary institutions. It is **not** intended to be a comprehensive list; instead it is intended to highlight the major areas the institution should review when establishing new programs and adding locations. NASFAA suggests the institution conduct a comprehensive review of all institutional and program eligibility regulations and requirements prior to new program or additional location implementation. Questions about adding and approving programs and locations should be directed to U.S. Department of Education (ED) School Participation Teams (see attached contact list). Questions about awarding and disbursing aid may be directed to NASFAA at askregs@nasfaa.org.

Federal Student Aid (FSA) Handbooks are available on the U.S. Department of Education's (ED's) Information for Financial Aid Professionals (IFAP) Web site at <http://www.ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook&set=current>. The NASFAA *Encyclopedia*, which contains current and historical Title IV program guidance, regulations, and statute in a user-friendly and searchable format, may be found on-line at <http://www.nasfaa.org/Apps/EPlus/Default.asp>. NASFAA's *Self-Evaluation Guide for Institutional Participation* is an in-house assessment tool to assist institutions in determining the effectiveness of their administration of the Title IV programs; the *Guide* is also available on the NASFAA Web site at <http://www.nasfaa.org/Publications/SelfEvalMenu.asp>. Likewise, the *NASFAA Policies & Procedures Tools* are available on-line at <http://www.nasfaa.org/publications/ppmanualindex.htm>.

AREA TO REVIEW	CONSIDERATION(S)	RESOURCES	CITATION(S)
Academic Program Approval	<ul style="list-style-type: none"> ➤ Does the institution have approval for this new program from an ED-recognized accrediting agency and/or the appropriate state agency? ➤ Is the institution legally authorized by the state where it is located to provide the educational program? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, pp. 2-2 to 2-4; 2-11; 2-65 to 2-68 ➤ GEN-09-08 ➤ GEN-08-07 ➤ GEN-06-17 ➤ <i>ED-recognized regional and national accrediting agencies Web site</i>: http://www.ed.gov/admins/finaid/accred/index.html ➤ NASFAA <i>Encyclopedia</i>: Section 1.2.4 	<ul style="list-style-type: none"> ➤ HEA 481(b) ➤ 34 CFR 600.2, <i>Educational program</i> ➤ 34 CFR 668.4(a)(1) ➤ 34 CFR 668.8
Academic Program Eligibility	<ul style="list-style-type: none"> ➤ Does the program meet the requirements for an eligible program (e.g., minimum length, credential earned, training provided, admissions criteria, etc.)? ➤ Does the program meet the additional eligibility requirements for Academic Competitiveness Grant (ACG) and National Science and Mathematics Access to Retain Talent (SMART) Grant awards? ➤ Does the program meet the additional eligibility requirements for Teacher Education Assistance for College and Higher Education (TEACH) Grant awards? ➤ Does the program meet eligibility requirements if it offers courses via distance education? 	<ul style="list-style-type: none"> ➤ <i>Federal Register</i>, 05/21/09, pp. 20212 to 20217 ➤ <i>Federal Register</i>, 06/23/08, pp. 35473 to 35470 ➤ <i>Federal Register</i>, 03/21/08, pp. 15338 to 15343 ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, pp. 2-11 to 2-18; 2-61 to 2-65; 2-99 to 2-103 ➤ GEN-08-12, p. 76 ➤ GEN-08-07 ➤ GEN-06-17 ➤ NASFAA <i>Encyclopedia</i>: Section 1.10 	<ul style="list-style-type: none"> ➤ HEA 481(b) ➤ HEA 484(k),(l) ➤ 34 CFR 600.2, <i>Educational program</i> ➤ 34 CFR 600.51(d) ➤ 34 CFR 668.4 ➤ 34 CFR 668.8 ➤ 34 CFR 668.10 ➤ 34 CFR 686.2(d), <i>TEACH Grant-eligible program</i> ➤ 34 CFR 691.2(d), <i>Eligible program</i>

AREA TO REVIEW	CONSIDERATION(S)	RESOURCES	CITATION(S)
Academic Program Format	<ul style="list-style-type: none"> ➤ Is the program a standard term, nonstandard term, or nonterm credit-hour or clock-hour program? ➤ Will the institution need to adjust its packaging policies and procedures to accommodate multiple program formats? 	<ul style="list-style-type: none"> ➤ <i>Federal Register</i>, 05/21/09; pp. 20212 to 20218 ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapters 1; 3 to 7 ➤ NASFAA <i>Encyclopedia</i>: Sections 1.10.1.2 and 1.10.1.2.1 ➤ <i>NASFAA Policies & Procedures Tools</i> 	<ul style="list-style-type: none"> ➤ 34 CFR 668.8
Academic Year Requirements	<ul style="list-style-type: none"> ➤ Does the program meet the Title IV academic year definition requirements (i.e., minimum number of weeks of instruction and minimum number of credit or clock hours)? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, p. 2-15 ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, pp. 3-1 to 3-4; 3-26 to 3-103; 3-113 to 3-116 ➤ GEN-06-18 ➤ GEN-06-05, p. 2 ➤ NASFAA <i>Encyclopedia</i>: Section 1.10.1.1 	<ul style="list-style-type: none"> ➤ HEA 481(a) ➤ 34 CFR 668.3
Additional Location	<ul style="list-style-type: none"> ➤ Will at least 50 percent of the new program be offered off-site and necessitate the addition of a new location? ➤ Has the institution updated its Program Participation Agreement (PPA) on-line via ED's Application for Approval to Participate in the Federal Student Financial Aid Programs (E-App) Web site to include the additional location? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, pp. 2-11; 2-61 to 2-64 ➤ E-App Web site: http://www.eligcert.ed.gov/ ➤ NASFAA <i>Encyclopedia</i>: Sections 1.2.10.1 and 1.4.1.1 	<ul style="list-style-type: none"> ➤ 34 CFR 600.10(b) ➤ 34 CFR 600.20(c)(1) ➤ 34 CFR 600.21(a) ➤ 34 CFR 600.32
Program Participation Agreement (PPA)	<ul style="list-style-type: none"> ➤ Has the institution reviewed and updated its PPA on-line via ED's E-App Web site? ➤ If the new program represents a new academic level of offering (e.g., undergraduate versus graduate), has the institution updated its PPA to include the program? ➤ If required, has the institution obtained ED approval before awarding Title IV funds for the new program? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, pp. 2-61 to 2-68 ➤ GEN-08-07 ➤ E-App Web site: http://www.eligcert.ed.gov/ ➤ NASFAA <i>Encyclopedia</i>: Section 1.4.5 	<ul style="list-style-type: none"> ➤ HEA 487 ➤ 34 CFR 600.10(c) ➤ 34 CFR 600.21(a) ➤ 34 CFR 668.14
Packaging Policies	<ul style="list-style-type: none"> ➤ Will the new program's target student population differ from the institution's current student population? ➤ If so, will this require reconsideration of the institution's packaging policies (e.g., for nontraditional, independent, less-than-full-time students)? 	<ul style="list-style-type: none"> ➤ <i>Federal Register</i>, 05/21/09, pp. 20217 to 20218 ➤ <i>Federal Register</i>, 11/13/00, pp. 68049 to 68057 ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapter 7 ➤ NASFAA <i>Encyclopedia</i>: Section 1.14 ➤ <i>NASFAA Policies & Procedures Tools</i> 	<ul style="list-style-type: none"> ➤ 34 CFR 673.5 -6 ➤ 34 CFR 674.10 ➤ 34 CFR 675.10 ➤ 34 CFR 676.10 ➤ 34 CFR 682.204 ➤ 34 CFR 685.203 ➤ 34 CFR 686.21 ➤ 34 CFR 690.62 ➤ 34 CFR 691.62

AREA TO REVIEW	CONSIDERATION(S)	RESOURCES	CITATION(S)
Payment Periods and Disbursements	<ul style="list-style-type: none"> ➤ Has the institution reviewed the general rules for determining payment periods and disbursements for students enrolled in the new program? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapter 1 ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapter 2 ➤ NASFAA <i>Encyclopedia</i>: Section 1.15.5.1 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164
<ul style="list-style-type: none"> ➤ Academic Competitiveness Grant (ACG) and National Science and Mathematics Access to Retain Talent (SMART) Grant Programs 	<ul style="list-style-type: none"> ➤ Has the institution set up its ACG and SMART Grant specific payment periods and disbursement dates appropriate for the new program and in accordance with grade level progression rules? 	<ul style="list-style-type: none"> ➤ <i>Federal Register</i>, 05/21/09, pp. 20217 to 20218 ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapters 1 and 4 ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapter 2 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 2, Section IV 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164 ➤ 34 CFR 691.63-65 ➤ 34 CFR 691.76
<ul style="list-style-type: none"> ➤ Federal Pell Grant Program 	<ul style="list-style-type: none"> ➤ Which Federal Pell Grant calculation formula applies to this program? ➤ Has the institution set up its Federal Pell Grant specific payment periods and disbursement dates appropriate for the new program? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapters 1 and 3 ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapter 2 ➤ NASFAA <i>Encyclopedia</i>: Sections 2.11.3; 2.11.5; and 2.13.2 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 2, Section III 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164 ➤ 34 CFR 690.63-65 ➤ 34 CFR 690.76
<ul style="list-style-type: none"> ➤ Federal Perkins Loan Program 	<ul style="list-style-type: none"> ➤ Has the institution set up its Federal Perkins Loan specific payment periods and disbursement dates appropriate for the new program? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapters 6 and 7 ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapter 2 ➤ NASFAA <i>Encyclopedia</i>: Section 5.6.1 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 2, Section VII 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164 ➤ 34 CFR 674.16
<ul style="list-style-type: none"> ➤ Federal Family Education Loan (FFEL) and Federal Direct Student Loan (Direct Loan) Programs 	<ul style="list-style-type: none"> ➤ Has the institution set up the appropriate loan periods and disbursement dates appropriate for the new program? ➤ Will the institution be using a scheduled academic year (SAY) or a borrower-based academic year (BBAY) in its FFEL or Direct Loan processing? ➤ Is the institution's student system able to manage the loan periods and disbursement dates for the new program? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapters 1 and 5 ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapter 2 ➤ NASFAA <i>Encyclopedia</i>: Section 6.12.4 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 2, Sections X and XI 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164 ➤ 34 CFR 668.167 ➤ 34 CFR 682.603(g) ➤ 34 CFR 682.604 ➤ 34 CFR 685.301(a)-(c) ➤ 34 CFR 685.303
<ul style="list-style-type: none"> ➤ Federal Supplemental Educational Opportunity Grant (FSEOG) Program 	<ul style="list-style-type: none"> ➤ Has the institution set up its FSEOG specific payment periods and disbursement dates appropriate for the new program? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapters 6 and 7 ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapter 2 ➤ NASFAA <i>Encyclopedia</i>: Section 3.4.7 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 2, Section IX 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164 ➤ 34 CFR 676.16
<ul style="list-style-type: none"> ➤ Teacher Education Assistance for College and Higher Education (TEACH) Grant Program 	<ul style="list-style-type: none"> ➤ If participating in the TEACH Grant Program, has the institution set up its TEACH Grant specific payment periods and disbursement dates appropriate for the new program? 	<ul style="list-style-type: none"> ➤ <i>Federal Register</i>, 06/23/08, pp. 35483 to 35484 ➤ <i>Federal Register</i>, 03/21/08, pp. 15336 to 15338 ➤ 2008-09 <i>FSA Handbook</i>: Calculating Awards and Packaging, Chapter 7 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 2, Section V 	<ul style="list-style-type: none"> ➤ 34 CFR 668.4 ➤ 34 CFR 668.164 ➤ 34 CFR 686.22-25 ➤ 34 CFR 686.33

AREA TO REVIEW	CONSIDERATION(S)	RESOURCES	CITATION(S)
Policies and Procedures	<ul style="list-style-type: none"> ➤ Do adjustments need to be made to the institution's financial aid policies and procedures? 	<ul style="list-style-type: none"> ➤ NASFAA <i>Encyclopedia</i>: Sections 1.25.4.1 and 1.27 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 1 ➤ NASFAA <i>Policies & Procedures Tools</i> 	<ul style="list-style-type: none"> ➤ HEA 487(a)(3) ➤ CFR 668.16(b)(4) ➤ CFR 668.53
Return of Title IV Funds (R2T4)	<ul style="list-style-type: none"> ➤ Is the payment period or the period of enrollment used to calculate the percentage of earned aid for students who withdraw from the new program? ➤ Does the payment period or period of enrollment of this new program change the calculation of institutional charges in the R2T4 formula? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Overawards, Overpayments, and Withdrawal Calculations, pp. 5-23, 5-34 to 5-37; 5-45 to 5-46; 5-77 to 5-84 ➤ GEN-04-12 ➤ GEN-00-24 ➤ NASFAA <i>Encyclopedia</i>: Section 1.17 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 1, Section III 	<ul style="list-style-type: none"> ➤ HEA 484B ➤ 34 CFR 668.22(f)
Satisfactory Academic Progress (SAP)	<ul style="list-style-type: none"> ➤ Will the new program be monitored under the current SAP policy used for other programs? ➤ If the SAP schedule will be different from other programs, has the institution updated its consumer information regarding the SAP policy for this new program? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, pp. 2-70, 2-125 ➤ 2008-09 <i>FSA Handbook</i>: Student Eligibility, pp. 1-7 to 1-10 ➤ NASFAA <i>Encyclopedia</i>: Section 1.3.3.1 	<ul style="list-style-type: none"> ➤ HEA 484(c) ➤ 34 CFR 668.16(e) ➤ 34 CFR 668.32(f) ➤ 34 CFR 668.34 ➤ 34 CFR 668.42(c)
Student Consumer Information	<ul style="list-style-type: none"> ➤ Do adjustments need to be made to the institution's consumer information requirements, including but not limited to available financial aid and transfer of credit policies, related to the new program? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, pp. 2-69 to 2-71 ➤ GEN-08-12, p. 99 ➤ NASFAA <i>Encyclopedia</i>: Section 1.7 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 1 Section V 	<ul style="list-style-type: none"> ➤ HEA 485(a)(1),(f),(h) ➤ 34 CFR 668.42 ➤ 34 CFR 668.44
Title IV Cash Management	<ul style="list-style-type: none"> ➤ Will the new program or additional location require adjustments to the institution's cash management procedures (e.g., disbursement methods, requesting and maintaining Title IV funds)? 	<ul style="list-style-type: none"> ➤ 2008-09 <i>FSA Handbook</i>: Processing Aid and Managing Federal Student Aid Funds, Chapters 3 and 4 ➤ <i>The Blue Book</i> (October 2005): Chapter 13 ➤ NASFAA <i>Encyclopedia</i>: Section 1.15 ➤ NASFAA <i>Self-Evaluation Guide</i>: Part 1, Section II 	<ul style="list-style-type: none"> ➤ 34 CFR 668.161-167
Written Agreements	<ul style="list-style-type: none"> ➤ If the new program involves courses taken at another institution under a written agreement (e.g., articulation, consortium, contractual, study abroad), does the agreement meet all applicable Title IV requirements? 	<ul style="list-style-type: none"> ➤ 2009-10 <i>FSA Handbook</i>: School Eligibility and Operations, p. 2-16; Chapter 7 ➤ GEN-08-12, p. 67 ➤ NASFAA <i>Encyclopedia</i>: Section 1.3.3.1.4 	<ul style="list-style-type: none"> ➤ HEA 486A ➤ 34 CFR 668.5

Note: School Participation Team contact information is attached and available on ED's Application for Approval to Participate in the Federal Student Financial Aid Programs Web site at <http://www.eligcert.ed.gov/>.

U.S. Department of Education School Participation Team Contact Information

IF YOU ARE LOCATED IN...	CONTACT THE...	BY TELEPHONE...
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont	Boston Team	(617) 289-0133
Arkansas, Louisiana, New Mexico, Oklahoma, Texas	Dallas Team	(214) 661-9490
New Jersey, New York, Puerto Rico, U.S. Virgin Islands	New York Team	(646) 428-3750
Iowa, Kansas, Kentucky, Missouri, Nebraska, Tennessee	Kansas City Team	(816) 268-0410
District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, West Virginia	Philadelphia Team	(215) 656-6442
Colorado, Michigan, Montana, North Dakota, South Dakota, Utah, Wyoming	Denver Team	(303) 844-3677
Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina	Atlanta Team	(404) 562-6315
Arizona, California, Hawaii, Nevada, Pacific (Micronesia, Guam, Marianas, Palau)	San Francisco Team	(415) 486-5677
Illinois, Indiana, Minnesota, Ohio, Wisconsin	Chicago Team	(312) 730-1511
Alaska, Idaho, Oregon, Washington	Seattle Team	(206) 615-2594
Foreign Schools	Foreign Schools Team	(202) 377-3168

Note: School Participation Team contact information is also available on ED's Application for Approval to Participate in the Federal Student Financial Aid Programs Web site at <http://www.eligcert.ed.gov/>.