

Federal Guidance on How to Comply with Title IV Policies For Students Impacted by Coronavirus (COVID-19).

The following is a summary of guidance provided by the Department of Education's Office of Postsecondary Education for Institutions of Higher Education. Updated: March 20th, 2020

The Department of Education recommends institutions document, as contemporaneously as possible, any actions taken as a result of COVID-19, including actions taken following guidance and flexibility provided by the department in light of this crisis.

Federal Work Study (FWS)

For students enrolled and performing FWS at a campus that must close due to COVID-19, or for a FWS student who is employed by an employer that closes as a result of COVID-19, the institution may continue paying the student Federal work-study wages during that closure if it occurred after the beginning of the term, the institution is continuing to pay its other employees (including faculty and staff), and the institution continues to meet its institutional wage share requirement. Graduate students who are paid FWS wages on salary may continue to be paid for the remainder of the term if the institution is also paying its faculty and staff during that period. In these instances, institutions should document (as contemporaneously as feasible) that the COVID-19 disruption was the reason the student received FWS funds without documentation of hours worked.

Satisfactory Academic Progress (SAP)

Circumstances related to an outbreak of COVID-19, including, but not limited to, the illness of a student or family member, compliance with a quarantine period, or the general disruption resulting from such an outbreak may form the basis of a student's SAP appeal even if not specifically articulated in the institution's SAP policy.

Return of Title IV Funds

Even in the case of a disruption from COVID-19, an institution must return any Title IV funds for which it is responsible when a student withdraws. Currently, ED does not have the authority to waive the statutory requirement for the return of unearned Title IV funds in the case where a student (who receives Title IV assistance) withdraws from an institution during a payment

period or period of enrollment after having begun attendance. This flexibility can only come from Congressional action.

Length of Academic Year

The Department is authorized to approve a reduced academic year. If at any point an institution determines it will close as the result of a campus health emergency, it may contact the School Participation team to request a temporary reduction in the length of its academic year.

Professional Judgement

Financial aid administrators (FAA) have statutory authority to use professional judgement to make adjustments on a case-by-case basis to the cost of attendance or to the data elements used in calculating the EFC to reflect a student's special circumstances. The use of professional judgement where students and/or their families have been affected by COVID-19 is permitted, such as in the case where an employer closes for a period of time as a result of COVID-19. In making professional judgement determinations, FAAs must obtain documentation and retain it in each student's file. This documentation must substantiate the reason for any adjustment. Institutions are reminded that, regardless of how broadly an event may affect its student population, professional judgement determinations must be made and documented on a case-by-case basis.

For more information and any updates please see the following page:

<https://ifap.ed.gov/electronic-announcements/030520Guidance4interruptionsrelated2CoronavirusCOVID19>