



INDIANA COMMISSION  
*for*  
HIGHER EDUCATION

TO: Indiana Higher Education Financial Aid Offices

FROM: Mary Jane Michalak, Associate Commissioner, Student Financial Aid *lmjm*

RE: Credit Completion Requirements under House Enrolled Act 1348-2013

DATE: August 21, 2013

House Enrolled Act (HEA) 1348-2013 updates several eligibility requirements for the Higher Education Award under IC 21-12-13, the Freedom of Choice Award under IC 21-12-4, the 21<sup>st</sup> Century Scholarship under IC 21-12-6, and the Part-Time Student Grant Program under IC 21-12-8. This memo outlines those updates, gives administrative guidance related to questions the Indiana Commission for Higher Education (Commission) has heard in the months since its passage, and provides a Frequently Asked Questions section to provide additional detailed information about the implementation of the legislation.

**OVERVIEW – HIGHER EDUCATION AWARD AND FREEDOM OF CHOICE AWARD**

- IC 21-12-3-9 requires students receiving the Higher Education Award to successfully complete at least **24 credit hours** or the equivalent by the end of the student's first academic year; at least **48 credit hours** or the equivalent by the end of the student's second academic year; and at least **72 credit hours** or the equivalent by the end of the students third academic year to renew their state financial aid awards. Students who receive the Freedom of Choice Award under IC 21-12-4 must also meet the above renewal requirements according to IC 21-12-4-3.
  - Students who earn at least **30 credit hours** or the equivalent by the end of the student's first academic year; at least **60 credit hours** or the equivalent by the end of the student's second academic year; and at least **90 credit hours** or the equivalent by the end of the students third academic year will receive a higher award than students who complete at least 24/48/72 credit hours or the equivalent, but less than 30/60/90 credit hours. Students may also earn additional money through incentives for honors diplomas, meeting certain grade point average (GPA) thresholds, earning an associate degree before entering a baccalaureate program, or earning additional credit hours during certain academic years.
- IC 21-12-3-9 also sets forth an appeals process for students unable to meet the above requirements. The Commission will determine if "extenuating circumstances" existed that prevented the student from meeting the completion requirements.
- IC 21-12-3-9 establishes a new grade point average (GPA) policy that requires students to maintain at least a cumulative GPA that the eligible institution determines is satisfactory academic progress (SAP). Students who initially enrolled in Fall 2012 and were previously affected by the SEA 177-2011 enacted tiered GPA policy (2.25 on a 4.0 scale for hours associated with the sophomore year; 2.5 on a

4.0 scale for hours associated with junior and senior years) will now be held to SAP for renewal of awards.

### **OVERVIEW – 21<sup>st</sup> CENTURY SCHOLARS AWARD**

- IC 21-12-6-7 requires students receiving the 21<sup>st</sup> Century Scholars Award to successfully complete at least **30 credit hours** or the equivalent by the end of the student's first academic year; **60 credit hours** or the equivalent by the end of the student's second academic year; and **90 credit hours** or the equivalent by the end of the student's third academic year.
- Students who do not reach the above milestones may still receive a Higher Education Award or Freedom of Choice Award **if they are otherwise eligible for those programs.**
- Students who lose eligibility in Scholars program because they have not met the credit completion requirements regain eligibility for the Scholars program by completing the number of credits required for each year. For example, if a student loses eligibility in the Scholars program because he has not completed 30 credits by the end of the first academic year, the student may earn regain eligibility into the Scholars program in the third academic year by completing 60 credits by the end of the second academic year.
- IC 21-12-6-7 sets forth an appeals process for students unable to meet the above requirements. The Commission will determine if "extenuating circumstances" existed that prevented the student from meeting the completion requirements.
- IC 21-12-6-7 established a new grade point average (GPA) policy that requires students to maintain at least a cumulative GPA that the eligible institution determines is satisfactory academic progress (SAP). Students who initially enrolled in Fall 2012 and were previously affected by the SEA 177-2011 enacted tiered GPA policy (2.25 on a 4.0 scale for hours associated with the sophomore year; 2.5 on a 4.0 scale for hours associated with junior and senior years) will now be held to SAP for renewal of awards.

### **FREQUENTLY ASKED QUESTIONS RELATED TO 21<sup>ST</sup> CENTURY SCHOLARS AWARDS**

- Can a student opt out of the 21<sup>st</sup> Century Scholars Program?
  - Yes, a student can opt out of the 21<sup>st</sup> Century Scholars Program. This will require the Commission to make changes to the file layout and xGrads to allow schools to uncheck a Scholars' eligibility for an Academic Year so that only Higher Education Award and incentives or the Freedom of Choice Award are calculated. Additionally, schools would have to notify the Commission that the student is opting out of 21<sup>st</sup> for the year so the Commission can make notes in the file. **Students should carefully consider whether they want to opt out of the 21<sup>st</sup> Century Scholars program.**
  - Students may opt out of the 21<sup>st</sup> Century Scholars program for a year or permanently. However, if the student opts out of the program for a year, the student must meet eligibility requirements when the student returns to the program.

- Students who are 21<sup>st</sup> Century Scholars are “high-risk” students. Is it realistic for them to keep on track for the 30/60/90 requirement?
  - Yes. In a study done within the University of Hawaii system by Complete College America, students who took 15 or more credits tended to be more prepared and have better academic success in all but the lowest levels of academic preparation. This was true for both Pell and Hawaii state aid recipients.
  - It is important to note that 21<sup>st</sup> Century Scholars receive more financial assistance than students receiving the Higher Education Award or the Freedom of Choice Award, so the State asks more of them in return. State law already requires them to maintain a minimum GPA in high school to better prepare them better for college.
  - Students have the opportunity to make up credits in summer if they do not complete a minimum of 30 credits during the school year. It will be less expensive for a student to make up two classes during the summer (if they only take 12 during the school year) than for the student to not complete his or her degree in four years and have to attend the fifth year of college. The Commission estimates a fifth year of college can cost as much as \$50,000 including tuition, fees, educational costs, and loss of income.
- If 21<sup>st</sup> Century Scholars want to meet the criteria for the Accelerated Schedule and take 15 credits during each of the regular semesters of an academic year, does this mean they will have to pay for the additional nine credit hours they will need to complete the accelerated schedule using other resources?
  - At this time, only Frank O’Bannon students (students receiving the Higher Education Award and the Freedom of Choice Award) are eligible for the incentives because students in the 21<sup>st</sup> Century Scholars program already receive full tuition and regularly assessed fees at public institutions.
- How are 21<sup>st</sup> Century Scholars’ summer awards going to work? Will they have to bank the money or will there be some available for a summer distribution?
  - A Scholar attending a flat-rate school (e.g. Purdue West Lafayette, Ball State, Indiana University Bloomington) should be encouraged to take 15 credits per semester or more because the student’s tuition is the same regardless of whether the student takes 12 credits or 15 credits.
  - If a student attends a credit-hour school, the student would need to discuss with the financial aid office options to hold some of the Scholars Award so the student would have money for summer.

### **OVERVIEW – PART-TIME STUDENT GRANT**

- IC 21-12-8-5 requires students receiving the part-time award to complete at least 18 credit hours or the equivalent per year to renew the part-time award starting with the 2013-2014 academic year.
- IC 21-12-8-3 requires students receiving the part-time award to enroll in at least six (6), but fewer than twelve (12) credit hours.

- IC 21-12-8-5 requires students receiving the part-time award to maintain at least a cumulative grade point average that the eligible institution determines is satisfactory academic progress (SAP).
- IC 21-12-8-3 allows the Commission to reduce a student's part-time award if the student is eligible to receive tuition reimbursement from an employer or another outside source starting with the 2013-2014 academic year.

### APPLICABILITY

- The eligibility requirements outlined above for the Higher Education Award under IC 21-12-13, the Freedom of Choice Award under IC 21-12-4, the 21<sup>st</sup> Century Scholarship under IC 21-12-6, and the Part-Time Student Grant Program under IC 21-12-8 apply to any student who initially enrolls in an eligible institution for an academic year beginning after August 31, 2013.
- The Commission defines "initially enrolled" as when the student first begins getting financial aid because IC 21-12-3-1 (version b) allows the Commission to first award aid to students who are currently enrolled in an approved postsecondary institute, as long as they are making SAP toward their first baccalaureate degree.
- In other words, students who first receive state financial aid under the Higher Education Award (IC 21-12-13), the Freedom of Choice Award (IC 21-12-4), the 21<sup>st</sup> Century Scholarship (IC 21-12-6) and the Part-Time Student Grant (IC 21-12-8) in Fall 2013 or after will be required to meet the eligibility requirements. Students who received state financial aid prior to Fall 2013 will not be required to meet the credit completion requirements, *but may be affected by other changes in legislation*. If the student attended an out-of-state school or an in-state school that is not considered to be an eligible institution, and the student then transfers to an eligible institution, even **if the student is not a first year student, the student would be required to meet the completion requirements if they begin to receive state financial aid**. However, if a student has received state financial aid prior to Fall 2013, took a break and then returns at some point after Fall 2013, the student will be grandfathered into the on-time award and will not be required to meet the completion standards.

### FREQUENTLY ASKED QUESTIONS RELATED TO APPLICABILITY

- Will the changes to the State programs in HEA 1348 be for new students only? What about transfer students that are new to this institution? What about a student under the current system who has a break in enrollment and comes back in two years? Are they grandfathered into the old program?
  - Statute says the section "applies to a student who initially enrolls in an eligible institution for an academic year beginning" in 2013. Eligible institution means a school that participates in the state's financial aid programs.
  - Students who received aid prior to Fall 2013 will not be required to meet the credit completion requirements, *but may be affected by other changes in legislation*. If the student attended an out-of-state school or an in-state school

that is not considered to be an eligible institution, and the student then transfers to an eligible institution, even **if the student is not a first year student, the student would be required to meet the completion requirements if they begin to receive state financial aid.** However, if a student has received state financial aid prior to Fall 2013, took a break and then returns at some point after Fall 2013, the student will be grandfathered into the on-time award and will not be required to meet the completion standards.

## **OVERVIEW – SCHEDULE OF AWARDS AND INCENTIVES**

- IC 21-12-1.7 establishes “Annual Awards” rather than term-based awards, allowing students to have more flexibility in using their state financial aid year-round, taking advantage of lower summer tuition and allowing them to supplement their Pell dollars, which cannot be used during summer.
- IC 21-12-1.7 also establishes that the Commission will annually adopt a “schedule of awards,” replacing the current formula process for award creation. The Schedule of Awards will be adopted by the Commission in February and will do the following:
  - Establish awards based on Expected Family Contribution levels for all students. (This will discontinue awards based on Parental Contribution for dependent students.)
  - Establish larger awards for students who complete 30 credit hours (or the equivalent), 60 credit hours (or the equivalent), or 90 credit hours (or the equivalent) in the prior academic year (“on-time award”) than for students who complete at least 24/48/72 credit hours but less than 30/60/90 credit hours (“full-time award”).
- Students who are not subject to the completion standards will be grandfathered into the “on-time” award amount.
- IC 21-12-1.7-4 also requires that the Commission establish incentive awards for students who:
  - Are “academic honors,” which is defined as, in the student’s first year as a student who graduated from high school with an academic honors or technical honors diploma or, after the student’s first year, a student who has maintained a cumulative grade point average of 3.0 on a 4.0 grading scale or its equivalent. (IC 21-12-1.7-1)
  - Received an associate degree **prior to** enrolling in a baccalaureate program; or
  - Made “accelerated progress” during the recipients’ most recently concluded academic year. Accelerated progress is defined as:
    - successfully completing at least 39 credit hours or the equivalent by the end of the student’s first academic year; or
    - successfully completing at least 78 credit hours or the equivalent by the end of the student’s second academic year.
    - **Students will not be eligible for the accelerated incentive in the student’s fourth academic year.**

- Students who are not subject to the completion requirements will continue to receive an incentive for the Academic Honors/Technical Honors diploma until 2016.
  - Students attending a public institution will receive \$800 annually.
  - Students attending a private, non-profit institution will receive \$1400 annually.
  - Students attending Ivy Tech Community College or proprietary school will receive \$700 annually.
- Incentives may be used for tuition and fees only.

### **FREQUENTLY ASKED QUESTIONS RELATED TO INCENTIVES**

- If a student gets the accelerated incentive in Year Two and Year Three and then enters into Year Four would the student be eligible to get any incentive for acceleration?
  - No. The intent of acceleration incentive is to encourage students to graduate in three years. Additionally, statute does not define an “accelerated progress” incentive for Year Four.
- For the associate degree incentive, do the students have to be associate degree students then enroll in a bachelor degree program?
  - Yes. Statute says they have to earn associate degree **before** entering bachelors program.
- What if the student enters college with an associate degree? Can he receive the associate’s degree incentive all four years?
  - If the student enters college with an Associate Degree and enrolls in a baccalaureate program, the student may be eligible for the associate degree incentive for four years. However, if a student enters with 60 credits, many of those credits may count toward the baccalaureate degree, so it may be likely that the student would graduate in less than four years.
- Is there any way for the associate degree language to be interpreted differently?
  - No. The statutory language is clear that the student must first earn an associate degree and then enroll in a baccalaureate program.
- What if the associate degree student starts a bachelor program at another school before finishing associate degree incentive?
  - Statute says the student has to complete the associate degree before entering the bachelor’s program to be eligible for the incentive.
- If a student takes AP classes, would that count toward the accelerated incentive?
  - Yes. If the student earns credit for AP courses by taking the AP exam, those credits count toward accelerated incentive, provided the institution accepts the credit.
  - If a student takes AP classes in high school and earns credit toward a college course for that AP course, that credit should be counted toward the completion requirements for determining state financial aid. The student must still enroll in a minimum of 12 credit hours to be eligible for the award. However, it will be important for students to note that some AP credits may not transfer if a student earns less than a “4” on an AP test.
- Are all incentives limited like the base award to tuition and fees only?
  - Yes. Incentives can be used toward tuition and fees only.

- For the incoming Freshmen (first year students) who can only receive Academic Honors/Technical Honors for the first year, does that mean just individuals who are freshmen with our institution or someone who has *never* attended college ever at any institution?
  - Students who first enroll after July 1, 2013 are affected by this policy. In other words, if a student has never been a student receiving financial aid at a college before, the student would only receive the academic honors incentive for one year, and would be required to earn the 3.0 GPA or higher in years 2, 3 or 4 to earn the academic honors incentive.
- John takes dual credit courses and starts his first year with 14 credits that count towards his degree. John earns 30 credit hours in his first year, so ends his first year with 44 credit hours total and receives the accelerated schedule award. In Year Two, John earns 36 credit hours for a total of 80 credit hours. Can John receive the accelerated schedule award for Year Three, even though he only completed 36 credit hours during his second year?
  - Yes. Statute says “accelerated progress means successfully completing at least 78 credits hours or the equivalent by the end of the student’s second academic year.” In total, John has earned 80 credit hours. Therefore, he can receive the accelerated incentive.

#### **FULL TIME STATUS AND CENSUS DATES**

- To be eligible for the Frank O’Bannon or 21<sup>st</sup> Century Scholars Award, students must be enrolled for a minimum of 12 credit hours or the equivalent during traditional semesters.
- **Students attending summer classes may enroll in less than 12 credits during summer terms because of the accelerated schedule of summer terms.**
- The State of Indiana will follow the federal guidelines for “non-term” students; however, if a school has students taking courses on a “non-term” basis, that school must have their “non-term” program reconciliation approved through the Program Participation Agreement (PPA). An addendum to the current PPA will be available from the Commission.

#### **FREQUENTLY ASKED QUESTIONS RELATED TO FULL-TIME STATUS**

- Will full time eligibility still be established at the census date as it is now?
  - Yes.
- If a fourth-year senior only needs to take nine credit hours during the spring semester to graduate, can the student still receive an O’Bannon Award?
  - Yes. Traditionally, the State has allowed an exception for students who are seniors to continue to receive their award without enrolling in extra credits during their last semester only. According to past practice, a college can use a credit-hour calculation to calculate a partial award for the student’s last semester only.

### CLAIMING AWARDS

- Schools may claim no more than 50 percent of the annual award for a student during the student's first term. However, schools *may* claim less than 50 percent of an award to allow students to have money to pay for summer classes. **Individual schools may determine administratively if they would like to make this a standard policy for their institutions.**
- Students should be aware that if they take less than 15 credit hours per term, to earn the "on-time" award, they will likely have to enroll in summer classes. If a school does not claim less than 50 percent of an award when a student takes fewer than 15 credit hours, the student will not have sufficient financial aid funds available to assist with paying for summer classes.
- Because of the GPA and credit completion requirements, institutions will be required to provide this information beginning in the 2014-2015 academic year. The plan will be for schools to report this information at a minimum upon reconciliation. However, *there may be a need for additional reporting to ensure information is available for transfer students.* The Commission will be working with an Institutional Research group that is already formed to discuss best practices, and additional information will be available at a later time.
- **In Year One, each eligible student will receive the maximum award.** Awards for Year Two, Three and Four will be determined by the performance of the student in the prior year. For example, John Smith earns 30 credits during Year One. In Year Two, he will receive an "on-time" award, provided he continues to enroll in at least 12 credit hours or the equivalent. In Year Two, John earns an additional 24 credits, bringing his cumulative credit-hours to 54 credits. In Year Three, John will receive a "full-time" award, provided he continues to enroll in at least 12 credit hours or the equivalent.

### FREQUENTLY ASKED QUESTIONS RELATED TO CLAIMING AWARDS

- If a student does a complete withdrawal in the semester, should we claim an award?
  - This will work the same as it currently does – no award should be reconciled, and the award will not count against the student's future aid eligibility.
- Will we be required to report enrollment dates to claim awards?
  - Yes, the Commission will require some kind of enrollment date reporting. This will be finalized with the institutional research working group.
- If a student takes less than 15 credit hours, but receives the "on-time award," will schools be required to prorate the award based on the number of hours the student takes?
  - No. Schools *may* claim less than 50 percent of an award to allow students to have money to pay for summer classes. **Individual schools may determine administratively if they would like to make this a standard policy for their institutions.**

### ANNUAL AWARD AND FAFSAS

- Students who file a FAFSA by the March 10 deadline will receive an annual award. This means that the award offer from the State will be valid for 12 months from the time at which the student begins taking his classes. If a student who files by the March 10 deadline defers enrollment and starts in the next year, prior to July 1, the student will still receive an award based on the leading year FAFSA.
  - For example, John files a 2014-2015 FAFSA on-time (by March 10, 2014), but does not start school until January 2015. John will have 12 months from January 2015 to utilize his annual award based on the 2014-2015 FAFSA data.
- Any student who begins taking classes at an institution prior to June 30 of a year will have an award associated with the leading year FAFSA. In other words, if a student files a 2014-2015 FAFSA, but does not start school until June 1, 2015, the student's annual award will be based on the 2014-2015 filed FAFSA, provided the FAFSA was filed by March 10, 2014.

### **TRANSFERS**

- For credit completion purposes, the Commission recognizes an earned credit as counting toward the completion requirements, even if the student transfers and the accepting school does not count the credit toward the student's degree. In other words, students who transfer credits will be able to count credits transferring toward their completion requirement.
- Data reporting related to transfers is still being finalized and more information will be forthcoming.
- If a student takes AP classes in high school and earns credit toward a college course for that AP course, that credit should be counted toward the completion requirements for determining state financial aid. The student must still enroll in a minimum of 12 credit hours to be eligible for the award. However, it will be important for students to note that some AP credits may not transfer from school to school if a student earns less than a 4 on an AP test.

### **CLASSES ELIGIBLE FOR COMPLETION**

- The Commission will count remedial credits toward the completion requirements with the following two conditions.
  - The remedial credits must be earned during the student's first academic year.
  - The number of remedial credits that will be counted toward the credit completion requirements will be limited to twelve (12), although the hope is that most students will need fewer than twelve (12) credit hours of remediation.
- It is preferable that remediation credits be limited both through early intervention strategies in high school and through use of a co-requisite model, in which students take remediation at the same time as gateway courses.
- The twelve credit threshold was chosen largely because the overwhelming majority of students who need remediation need it at a level of twelve (12) or fewer credit hours. Among the 2012 cohort, 96 percent of Ivy Tech students and 94 percent of

Vincennes students needed twelve or fewer hours of remediation. Even those students who need more than twelve (12) hours of remediation will be able to count the majority of remedial credits toward the credit completion requirement and pay for the coursework with financial aid.

- Remedial courses must be completed within the student's first academic year in order to be counted toward the credit completion requirement. The rationale behind this position is simple: if students need extra support to be successful in gateway college courses, then this activity should be the center of a student's academic plan during the first year (and preferably during the first semester).
- Any class, with the exception of any remedial class credit over 12 hours or remedial classes taken beyond Year One, which has been "successfully completed", should count toward the completion requirements.
- "Successfully completed" means a class that the student passes for credit. If a student takes a course and earns a D- or higher, it counts as "successfully completed," even if the student has to take it again for the class to count toward his or her degree. For example, a student may be required to earn a "C" or higher in a class to proceed to the next course in a series. However, the student may still earn a credit if the student earns a "D-" in the class. The credit earned for the class in which the student earned a D- should count toward the completion requirements even if the student must retake the class to fulfill a prerequisite.
- Repeat courses will also count toward the student's completion requirement, but only one time. If the student must take a course more than two times, the course will not count toward the completion requirements. In other words, the course may count toward completion requirements the first repeated time after a passing grade is received, but not after that.
- Students must complete the class within the 12 months for the class to be counted as "successfully completed" for that year. "Incomplete" classes will not count as "successfully completed" until a grade has been issued and the class has been "successfully completed."
- If a student completes dual credits in high school, those credits should be counted toward the completion requirements for determining state financial aid. However, the student must still enroll in a minimum of 12 credit hours to be eligible for the award. For example, John earns six credit hours through dual credit courses in high school. During his first year in college, he earns a total of 24 credits, bringing his total to 30 credits. John would be eligible for the "on-time" award in Year Two.
- If a student takes AP classes in high school and earns credit toward a college course for that AP course, that credit should be counted toward the completion requirements for determining state financial aid. The student must still enroll in a minimum of 12 credit hours to be eligible for the award. However, it will be important for students to note that some AP credits may not transfer from school to school if a student earns less than a 4 on an AP test.

### **FREQUENTLY ASKED QUESTIONS RELATED TO CREDIT COMPLETION**

- If credits don't count towards degree, do they count towards completion?

- Yes. A good example of this would be a student who earns 30 credits at a school and then changes his major completely. The student earned 30 credits and would be eligible for the “on-time” award in Year Two of his state eligibility even though the student may still need to earn additional credits toward a baccalaureate degree.
- Some of our students need to complete Fundamental classes before proceeding on with their program. The Fundamental courses are not part of their program, but would they count toward the credits completed for the Completion requirement for State? They do not count toward the progression for DL Loans, but we were not sure about State.
  - The Commission will view these developmental classes as the equivalent of remedial classes, so a total of 12 credits or the equivalent could count during the student’s first year only.
- Why can remedial classes only count in the first year?
  - If students need extra support to be successful in gateway college courses, then this activity should be the center of a student’s academic plan during the first year (and preferably during the first semester).

### **FREQUENTLY ASKED QUESTIONS RELATED TO ENROLLMENT**

- When does the “clock start ticking”?
  - For accelerated and on-time awards, the credit completion requirements start at the point the student first begins taking classes, not the point of first award. This means that **students can only get the accelerated bonus in successive years and students can only get the on-time award in successive years. This is to protect the integrity of the accelerated incentives, which are intended for “degree in three” type programs and the “on-time” awards, which are intended for students who graduate in four years from the time they first begin classes.**
  - For all other awards, the credit completion requirements start at the point in which the student receives his first award.
- If school is term based and term starts on September 1, but student doesn’t start taking a class until November (an eight-week class), when does the student’s 12 months start?
  - The 12 months starts when the term starts, so in this case, it would be September.
- For the credit completed within the “year,” if a student starts school in the fall term, they have until next fall to complete the minimum number of credits, and if the student starts school in the Winter Term (January – Term 2) they have until the end of Term 1 of next year to complete the minimum number of credits. Is this correct?
  - If Fall Term starts in August, the student would have until July 31 to complete the coursework to meet the 24 completed credits. If Winter Term starts in January, the student would have until December to complete 24 credits.
- The definition of “Year” for the credits completed is not financial aid year or an Academic Year but a Calendar Year for each student. That could be different for each student if they start college at different times throughout the year, right?

- Yes. The definition of “year” here is intended to give students 12 months to complete a minimum of 24 credits.
- If a student receives the Year One award, but then his EFC increases, and student isn’t eligible for an award in Year Two, which credit hour completion standard is required if the student is again financially eligible to receive an award in the student’s third year?
  - The student would have to have completed 24 credits by the end of the students first year of aid for the student to receive an award in the student’s third year of classes. The school would report the total credits accumulated, but the student would not be eligible for the “accelerated” or “on-time” award unless the student met those standards at the end of the first year of aid.
    - This fact pattern would also apply to students in the following situations:
      - Late FAFSA or no FAFSA filed
      - Ineligible for financial aid due to SAP requirements not met
- Is a “break” the same as non-enrollment or non-award?
  - Non-enrollment is a “break”, and the student returns in Year Two of the award status.
  - Non-award is not a “break”. The student can return in Year Two of the award status, but the student will not get the on-time award or the accelerated award in those cases.
- If a student takes 2.5 years to complete an associate degree and does not start a bachelor’s degree program right away, would the student have used three years of aid, even though only 2.5 years of aid was used, because of the annual award process?
  - The student should appeal in this case to ensure full eligibility.
- We have a term (called Mid-Term Start) that is not currently paid by the state because it starts about a week before the end of the reconciliation period. Would we still count those credits for that Mid Term Start?
  - Yes. Any credits earned can – and should – be counted toward the completion requirements, except for those remedial class credits exceeding the allowable 12 credit hours in the first year.
  - Regardless of whether the student receives financial aid, if these classes are counted on a transcript in some way, these classes would count toward the credit complete requirements. The school would report the total credits accumulated, but the student would not be eligible for the “accelerated” or “on-time” award unless the student met those standards at the end of the applicable year of aid.

## **APPEALS**

- IC 21-12-3-9 establishes an appeals process for students unable to meet the renewal requirements for the Frank O’Bannon program. The Commission will determine if “extenuating circumstances” existed that prevented the student from meeting the completion requirements.

- IC 21-12-6-7 establishes an appeals process for students unable to meet the renewal requirements for the 21<sup>st</sup> Century Scholars Program. The Commission will determine if “extenuating circumstances” existed that prevented the student from meeting the completion requirements.
- The Commission must establish “extenuating circumstances,” which may include one or more of the following: medical emergency, deployment, certain foster care situations, certain students with disabilities, domestic violence, homelessness, death in the family. These are some of the examples we have been given from financial aid representatives. These will be determined on a case-by-case basis.
- We will not consider ANY appeal that does not include documentation of extenuating circumstances.
- In the first year, appeals will be handled manually. Students will likely be required to file a paper appeal. The appeals process is currently being designed and more information will be available by December 2013.

### **FREQUENTLY ASKED QUESTIONS RELATED TO APPEALS**

- Can student appeal SAP to State?
  - No. Statute says SAP is “determined by institution.” If an institution made a determination on SAP, the State will honor that.

### **GENERAL QUESTIONS**

- Will the March 10 deadline stay for FAFSA?
  - Yes, for now. There may be a time when this is no longer needed, but we will not consider a change for several years.
- Have we started notifying students of these changes to 21st Century Scholars program?
  - Students have received multiple notification, including through eStudent, e-mail, and 21st financial aid officers and other university administrators should take every Century Scholars division through direct mail. That said, opportunity to reinforce the message and remind students of these requirements.
- Will there be a GPA template to use for reporting?
  - We will work on a template for GPA reporting once the Institutional Research group and the Commission work out final details.
- If student’s income changes drastically, what is protocol?
  - Currently this is not allowed as a professional judgment. Under the grid, it will be handled the same way as it is currently handled.
- If student does NOT complete a minimum of 24 credits, can he regain eligibility for in the awards program?
  - Yes, but the student must earn 48 credit hours by end of Year Two or 72 credits by the end of Year Three.
- Will colleges still get early advancement/up-front payments of funds?
  - For 13-14 and 14-15, yes. We want to reduce these up-front payments slowly, then eliminate the upfront payment process with a rolling

reconciliation process that will eliminate all but one deadline at the end of the fiscal year. At that time, we would encourage schools to reconcile early and often. More information about the rolling reconciliation process will be available in the future.

- If a student has a max award of \$3500 for the year, if they take 12 credit hours in the fall receiving \$1500, and take 15 credit hours in the spring, receiving \$1750, will they have \$250 to use in the summer?
  - Yes, if that is how the school chooses to claim the awards. Keep in mind that the Commission will not require schools to prorate awards for students, but individual schools may choose to prorate based on credit hours. Additionally, schools must work with students who request a portion of their awards be held for summer use. (IC 21-12-1.7-6 states, "An eligible institution, in consultation with the recipient, may reserve up to one hundred percent (100%) of a recipient's annual award amount for use in the summer.")
- What does the term "academic year" mean?
  - The term "academic year" means different things to universities, the State, and students. The State defines "academic year" in statute as "the period from September 1 of a year through August 31 of the next year." (IC 21-12-1-3). This is a 12-month period. These dates serve as a tool in statute to specify the effective dates and phase-in of policy. For example, it used for the purposes of saying the grid is effective for Academic Year 14-15. To universities, "academic year" aligns with the academic calendar or schedule, which may not align with the Sept. 1 – Aug. 30, but can be categorized consistently across institutions as AY 20XX-XX. Additionally, there is a difference between "academic year" as it relates to effective dates and phase-in of policies, and "a student's first academic year" as it relates to credit completion and GPA.
  - We interpret the "student's first academic year" to be the 12 months after they initially enroll (and so on), while the September 1-August 31 "academic year" is used for the purposes of saying, for example, the grid is effective for Academic Year 14-15.
  - The intent of the legislation was to allow students to work for 12 months to complete a minimum of 24 credits to maintain their awards.
- If student attended school part-time before 2013-2014, can they get the Frank O'Bannon Grant in the future, and at what level?
  - Yes, these students can still receive the Frank O'Bannon grant provided they enroll in a minimum of 12 credit hours. These students would be grandfathered in to the "on-time" award level.
- Will the Commission still track "units"?
  - Yes. More information will be forthcoming about this after the Commission meets with the institutional research group.
- A student applies for and receives the part-time grant but ultimately completes 24 credit hours in 12 months. Can the student move up to full-time, or will the student have to remain in the part-time pool?
  - The student would be eligible to receive the full-time Frank O'Bannon Award.
- Which GPA should schools be using?

- Statute requires the cumulative GPA to be used for both SAP and the incentives.
- Will there be any issues with classifications of academic years vs. credit hours? (Esp. for reporting?) For example, a freshman with 35 hours (from dual credit, etc.) will be a sophomore in our system, but will be in his first year of state aid.
  - The statute defines it as “first academic year,” “second academic year,” “third academic year,” and “fourth academic year,” to avoid this issue. A student who comes in with 35 dual credits would still get the first year award provided the student has not received any financial aid awards previously.
- If a student first enrolls in 13-14 and goes part-time, then he becomes full-time in 14-15, will he receive any aid?
  - If the student doesn't meet the 24/30 credit hour requirement he would not qualify for FOB/21st but could “catch up” to get back in the award pool by the end of the second year. The student could also potentially receive another part-time grant if the student completes at least 18 credit hours in the first academic year.
- Will the Commission have a process in place to address students with physical limitations who, due to their disability, cannot take 12 credit hours in a term?
  - Statute requires students to enroll in a minimum of 12 credit hours to be considered a full-time student. There is an appeal process for students who are unable to meet the renewal requirements. Students with disabilities may appeal if they do not meet the renewal requirements, and appeals will be considered if extenuating circumstances prevented the student from meeting the requirements. Existence of a disability in and of itself may or may not lead to an approved appeal. This will be considered on a case-by-case basis.
- For 2014-2015, will the base award and the GPA incentive be separated in the NOTF/RECN files? Will these have amounts in separate columns and will xGrads and eStudent show them as separate amounts?
  - Yes. The Commission plans to have separate columns so we can run reports internally on how much students are receiving in incentives and where.
- Some students come in with 30 credit hours or 60 credit hours (and an associate degree) through Early College programs. They are starting colleges as either sophomores or juniors. What credit hour requirement do they have to meet?
  - The students first year in college is considered the first academic year. If the student receives an award that year, that is also the first award year, and he would just need to meet the 30 credit-hour requirement by the end of the first year and the 60 credit-hour requirement by the end of the second year. Note, however, that he must still continue to enroll in 12 credit hours. (In other words, the student will have a buffer for completion, but not enrollment.)
- Is the GPA file how schools will report credit hours completed?
  - We are still working out reporting requirements. The Commission has discussed this with the ISFAA Government Relations committee, and believe that we can have schools report the credit hours and GPA at a minimum of one time when the award is claimed. Nothing has been solidified yet and

more information will be forthcoming after discussions with the institutional research group.

- At my school, the financial aid office only gets record from admissions/registrar of what credit hours are accepted by the college. So if student completed 45 credit hours elsewhere then transfers to my college and my college only accepts 15 of those hours, that is all the financial aid office gets notice of. How do I track the full hours?
  - The change in legislation may mean that some schools have to change their processes/procedures and have registrar's/admissions/academic affairs working more closely with financial aid. Students will need to bear some responsibility for getting the correct amount of credit hours reported to the Commission for evaluation of aid eligibility.

For more information on financial aid reforms resulting from HEA 1348, please contact the Awards Division at [CollegeFA@che.in.gov](mailto:CollegeFA@che.in.gov) or 888-528-4719.