

# Program Integrity Regulations

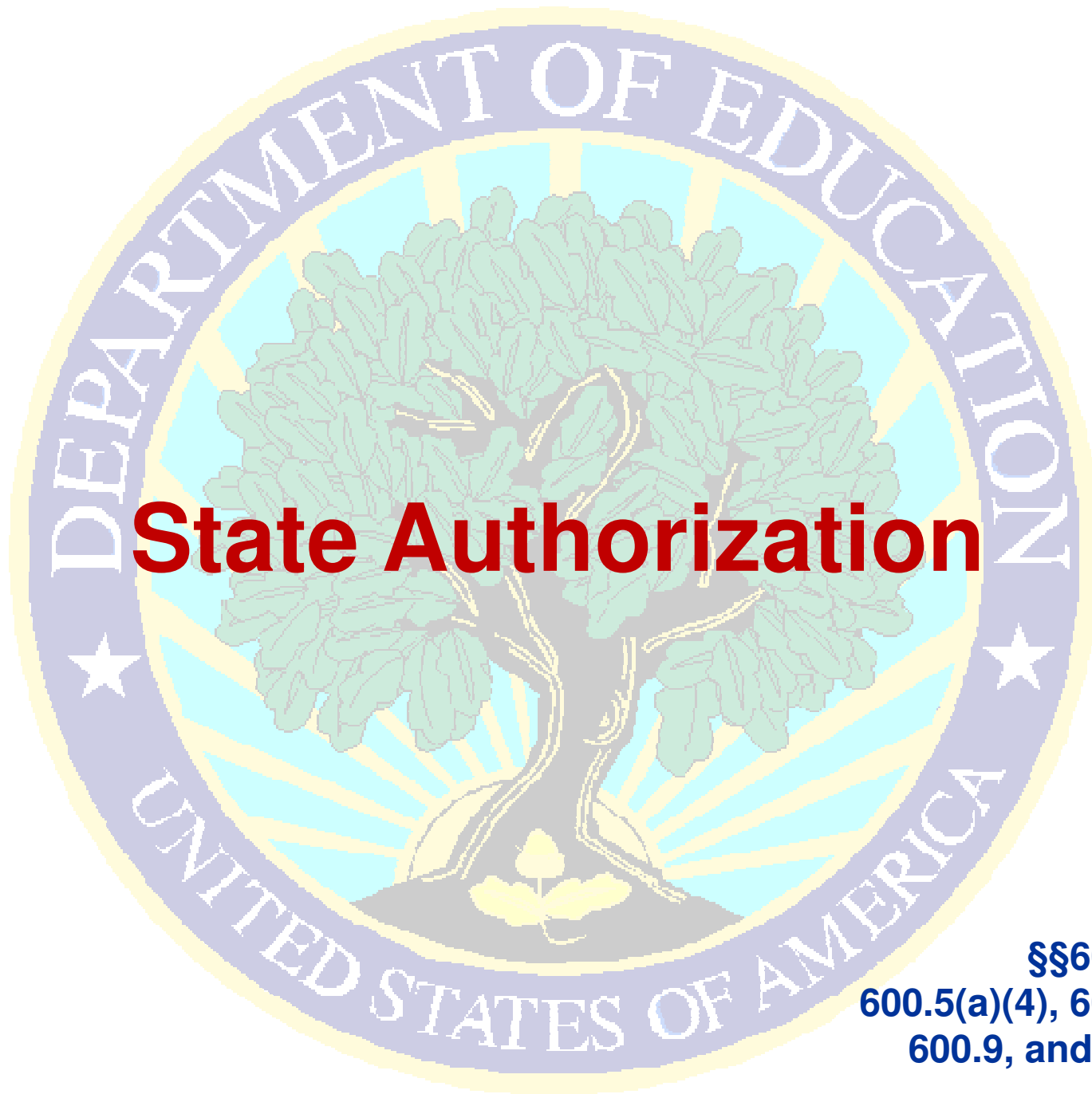


# Agenda

- Program integrity regulations
- Provisions:
  - State authorization
  - Credit hour
  - Gainful employment
  - Misrepresentation
  - Incentive compensation
  - Written arrangements
  - Disbursement
  - Return of title IV – modules
  - Return of title IV – taking attendance
  - Retaking coursework
  - High school diploma
  - Ability to benefit
  - SAP
  - Verification
- Contacts

# Program Integrity Regulations

- Notice of proposed rulemaking: June 18, 2010
  - <http://edocket.access.gpo.gov/2010/pdf/2010-14107.pdf>
- Final regulations: October 29, 2010
  - <http://edocket.access.gpo.gov/2010/pdf/2010-26531.pdf>
- General effective date: July 1, 2011
  - State authorization: two annual extensions – except distance provisions
  - Verification: July 1, 2012
- Technical corrections: anticipated in near future
- Dear Colleague letter: later this year



**§§600.4(a)(3),  
600.5(a)(4), 600.6(a)(3),  
600.9, and 668.43(b)**

# State Authorization

Under the Higher Education Act, for an institution in any State to be eligible to participate in Federal programs, it must be legally authorized by the State to provide postsecondary education.

Basis of an institution's operating authority

Exemptions/exceptions

Student complaints

Student consumer requirements

Distance education

# Implementation

- Are effective July 1, 2011
- Provide for extensions if an institution's State cannot provide the necessary authorization by July 1, 2011
  - An institution may request one-year extensions for the 2011-12 and 2012-13 award years.
  - The institution's State has until July 1, 2013 to make any needed adjustments to assure that institutions in the State may meet the new regulatory requirements.
- Do not provide extensions for distance education provisions

# Consumer Information

- An institution must provide its students or prospective students with contact information for filing complaints with-
  - Its accreditor; and
  - Its State approval or licensing entity and any other relevant State official or agency that would appropriately handle a student's complaint.

# Distance Education: basic provisions

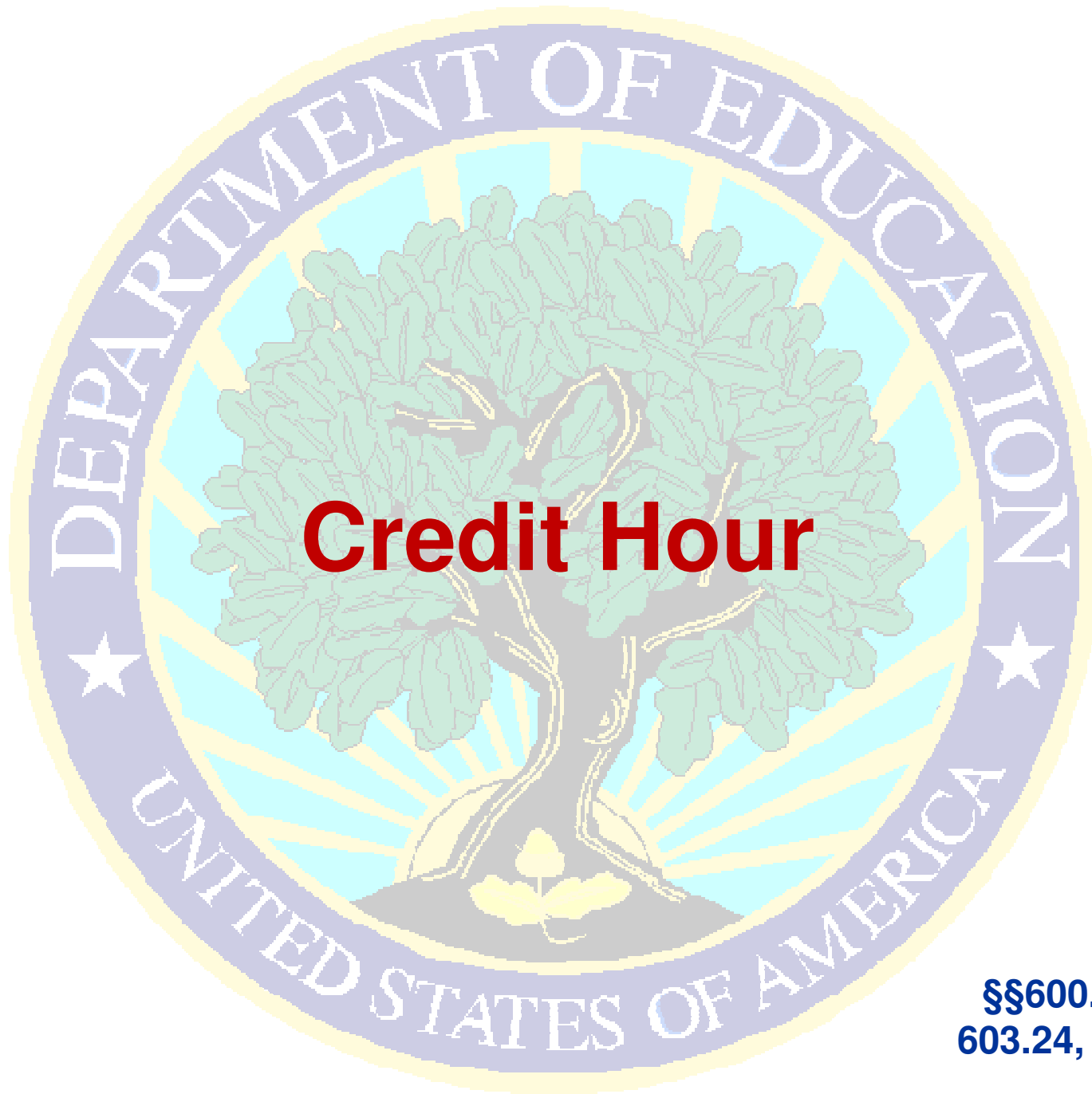
- Separate provisions for distance, online, or correspondence education to students in a State in which an institution is not physically located or in which it is otherwise subject to State jurisdiction
- State requirements, if any-
  - Must meet the State's requirements, to be legally offering postsecondary distance, online, or correspondence education in the State
  - Must be able to document the State's approval upon request

## **Distance Education: additional considerations**

- The regulations do not require that a State have an authorization/licensure process in this circumstance.
- State would determine the requirements for an institution to be considered to be operating in the State.
- The regulations apply to any institution—public, nonprofit, for-profit—operating in a State that regulates institutions offering distance, online, or correspondence education in the State.

## Distance Education: additional considerations

- If an institution has a physical presence offering postsecondary education in a State-
  - It must comply with the general requirements for State authorization; and
  - The distance provisions do not apply.
- If an institution does not establish legal authorization by a State that regulates distance or online education or correspondence study-
  - The institution is ineligible for Federal programs in that State; and
  - Any title IV student aid disbursed to students in that State is an institutional liability. The institution may be subject other adverse actions.



# Credit Hour

§§600.2, 602.24,  
603.24, and 668.8

# Credit Hour

- For purposes of Federal programs, the regulations:
  - Provide a definition of a credit hour or its equivalent; and
  - Establish consistent measure of eligibility for, and payments of, Federal funds.
- The regulations do not preclude an institution using a different definition for academic or other purposes.

## Credit Hour: definition (cont.)

- Must approximate not less than—
  - For a semester or trimester hour, one hour of classroom and two hours out of class student work each week in approximately a 15-week semester or trimester
  - For a quarter hour, one hour classroom and two hours out of class student work each week in a 10- to 12-week term quarter
- Equivalent work for other academic activities as established by the institution, e.g., lab work, internships, practica, studio work, and other academic work

# Credit Hour: accrediting agencies

- Applies to agencies if accreditation is to enable institutions to establish title IV, HEA program eligibility (§602.24(f))
- Must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours as part of an agency's review of an institution for initial accreditation or preaccreditation or renewal of accreditation

# Credit Hour: accrediting agencies

- Must review the institution's
  - Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and
  - The application of the institution's policies and procedures to its programs and coursework; and
- Must make a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education

# Credit Hour: State agencies for public postsecondary vocational education

- Similar requirements as apply to accrediting agencies
- Currently affects agencies in four States: New York, Pennsylvania, Oklahoma, and Puerto Rico
  - New York State Board of Regents, State Education Department, Office of the Professions

# Credit Hour: conversions

- Is an exception to the credit-hour definition that applies for purposes of the title IV, HEA programs
- Modifies when an institution must use clock or credit hours
- Modifies the standards for credit-to-clock-hour conversions

# Credit Hour: conversions

- A program must use clock hours if:
  - Except if required for a limited component of the program:
    - The program is required to be measured in clock hours for Federal or State approval; or
    - Licensure or completing clock hours is a requirement for licensure to practice an occupation;
  - The credit hours awarded are not in compliance with the definition of a credit hour; or
  - The institution does not provide the clock hours that are the basis for credit hours and does not require attendance in those hours.

# Credit Hour: conversions

- Undergraduate nondegree credit-hour programs must use clock-to-credit-hour conversion formula unless:
  - Each course in the program is fully acceptable to a degree program at the institution; and
  - The institution demonstrates students enroll in and graduate from that degree program.

# Credit Hour: conversions

New conversion ratios:

- One semester or trimester credit hour is equal to at least 37.5 clock hours.
- One quarter credit hour is equal to at least 25 clock hours.

# Credit Hour: conversions

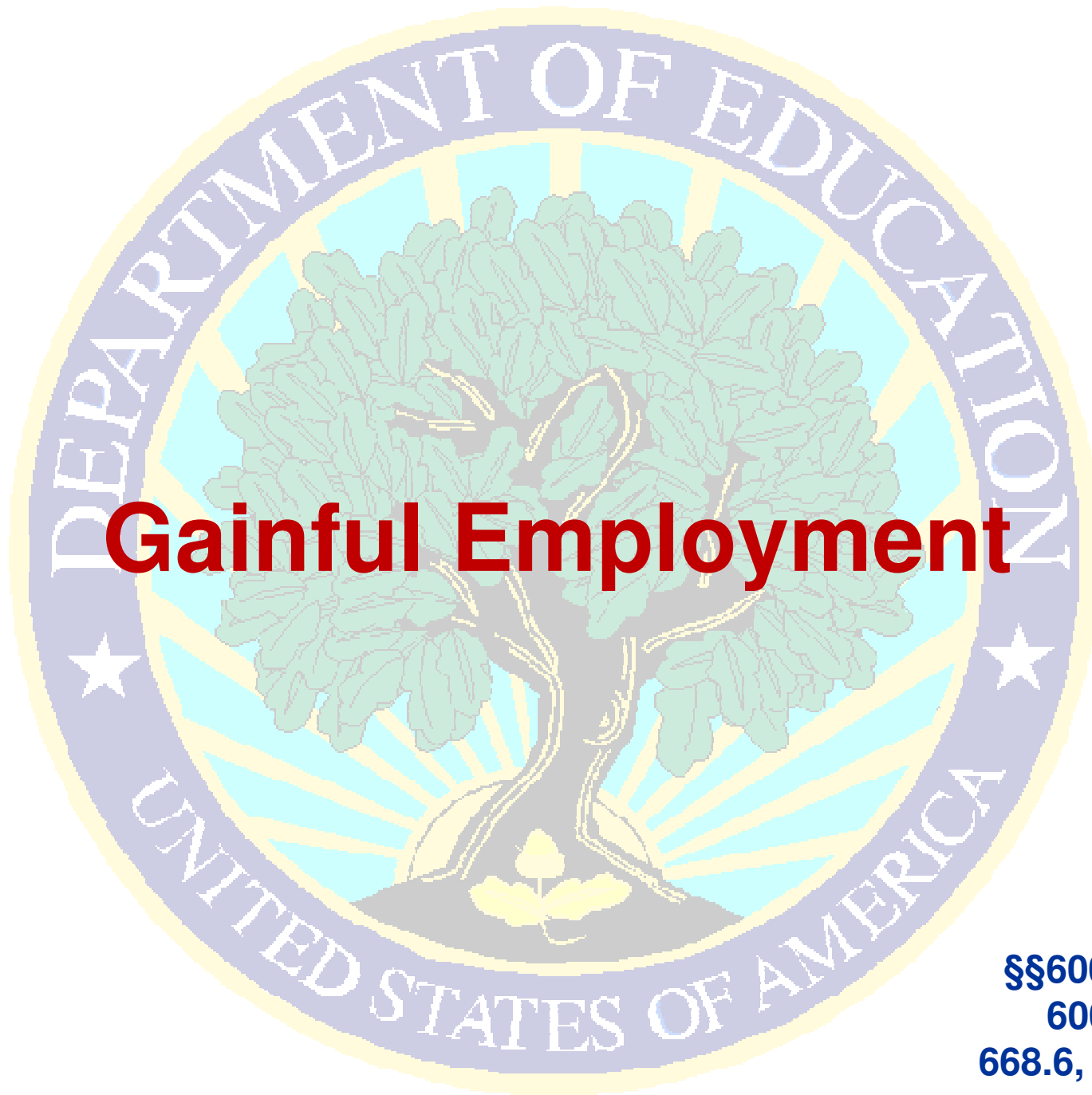
- Exception to conversion ratios for institutions that demonstrate that the credit hours meet new definition and there are no deficiencies identified by accreditor, or if applicable State approving agency
- Must base evaluation on individual coursework components of a program, e.g., classroom study versus practica or labs with little outside study

# Credit Hour: conversions

- Regardless, must meet these minimums:
  - One semester or trimester credit hour is equal to at least 30 clock hours.
  - One quarter credit hour is equal to at least 20 clock hours

# Credit Hour: conversions

- For students enrolled in programs subject to the conversion as of July 1, 2011, the institution may-
  - Use current regulations until the students complete the program; OR
  - Apply new regulations for all students enrolled in payment periods assigned to the 2011-12 award year.
- For students who enroll or reenroll on or after July 1, 2011, the institution must use the new regulations.



# Gainful Employment

**§§600.2, 600.4,  
600.5, 600.6,  
668.6, and 668.8**

# Gainful Employment

Applies to certain programs that are Title IV eligible because they lead to “gainful employment in a recognized occupation”

# Gainful Employment

- All programs at for-profit schools except for—
  - Program leading to baccalaureate degree in liberal arts (proprietary institution)
- Any program at a public or not-for-profit school that is not—
  - A program leading to degree
  - A transfer program of at least two years

# Gainful Employment

Recognized occupation is redefined as-

- One identified by a Standard Occupational Classification (SOC) code established by OMB, or
- One identified by an Occupational Network O\*NET-SOC code established by DOL

# Gainful Employment

Institution must annually submit information on *students who complete a program* leading to gainful employment in a recognized occupation including-

- Student and program information
- Amount from private loans or finance plans
- Matriculation information
- End of year enrollment information

# Gainful Employment

- Reporting by October 1, 2011
  - 2006-2007 award year information (if available)
  - 2007-2008, 2008-2009, 2009-2010 award year information
- Reporting for 2010-2011 and beyond
  - No earlier than September 30 but no later than the date established by the Secretary in a Federal Register

# Gainful Employment

Required disclosures in promotional material for prospective students and on Web site to include-

- Programs' occupations
- Cost
- Completion rate
- Placement rate
- Median loan debt

# Gainful Employment

## “New Programs” Notification-

- An institution must notify ED *at least 90 days before the first day of class* when it intends to offer a new educational program that leads to gainful employment in a recognized occupation
- Effective July 1, 2011

# Gainful Employment

## “New Program” Notification includes-

- Demand for program, including needs of various markets
- Wage analysis information
- Program review/approval process
- Demonstrate approval through school accreditation
- First day of class

# Gainful Employment

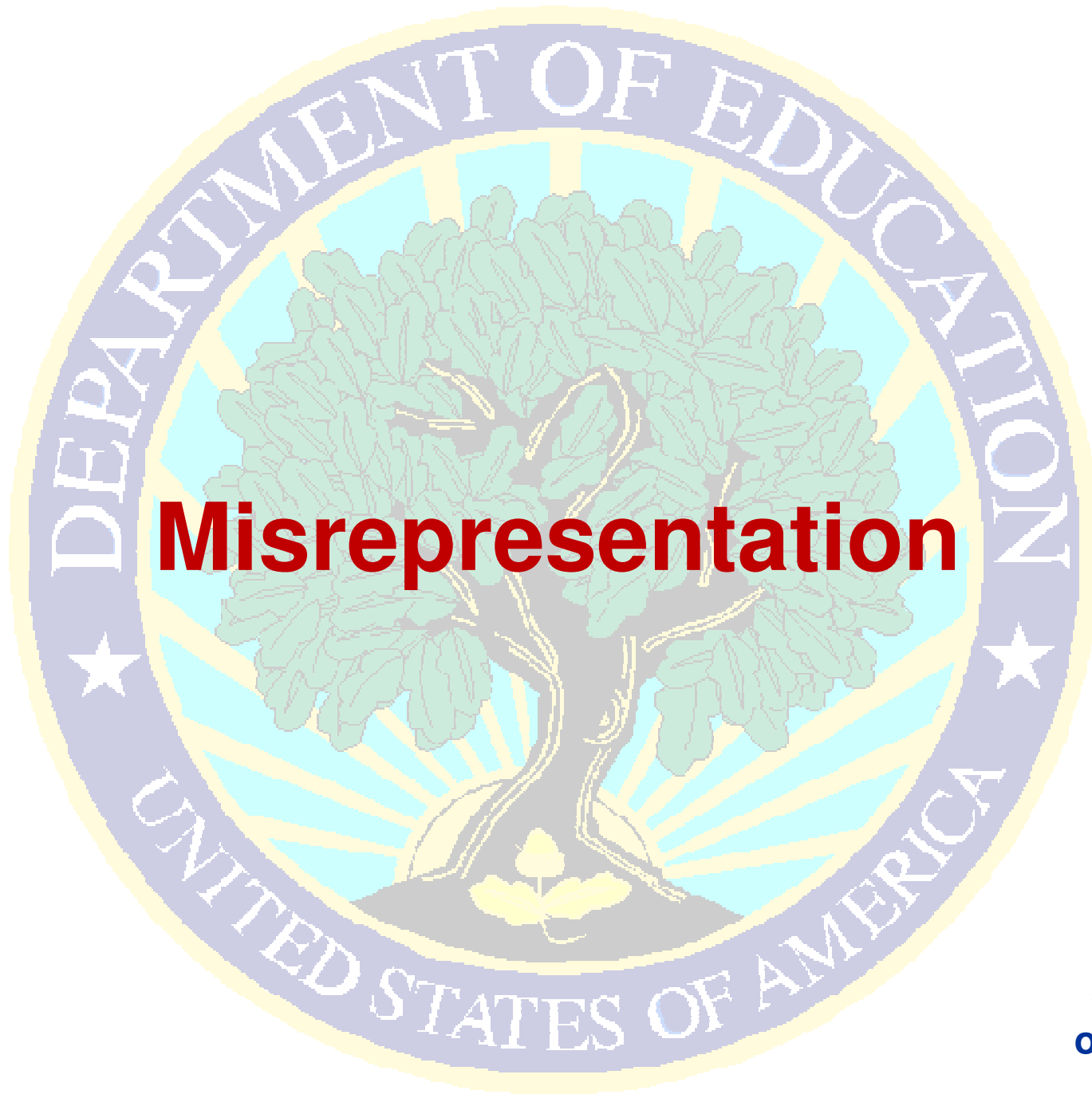
## “New Program” Approval Process-

- Unless ED requires approval for new programs, school is not required to get ED approval after notification is submitted
- If notification is not timely, school must obtain ED approval
- If ED needs to approve the program, an alert notice will be sent to the school at least 30 days before first day of class

# Gainful Employment

## Department's "New Program" Review

- Evaluates financial and administrative capability
- Determines whether program replaces or expands existing programs
- Looks at how program fits with historic offerings, growth, and operations
- Determines whether process and determination to offer program is sufficient



# Misrepresentation

# Misrepresentation

In general, the misrepresentation regulations describe-

- The actions ED may take if it determines that an institution has engaged in substantial misrepresentation
- The types of activities that constitute substantial misrepresentation

# Misrepresentation

In addition, the regulations-

- Provide that an eligible institution is deemed to engage in substantial misrepresentation if the institution, one of its representatives, or an entity under contract to the institution for providing educational programs or marketing, advertising, recruiting, or admissions activities makes a substantial misrepresentation regarding the eligible institution

# Misrepresentation

## Misrepresentation

- Any false, erroneous, or misleading statement made by the institution directly or indirectly to a student, prospective student, member of the public, accrediting agency, state agency, or to ED

# Misrepresentation

## Misleading statement

- Includes any statement that has the likelihood or tendency to deceive or confuse. Statement is any communication made in writing, visually, orally, or through other means. Includes student testimonials given under duress or because such testimonial was required to participate in a program

# Misrepresentation

## Substantial misrepresentation

- Any misrepresentation on which the person to whom it was made could reasonable be expected to rely, or has reasonably relied, to that person's detriment

# Misrepresentation

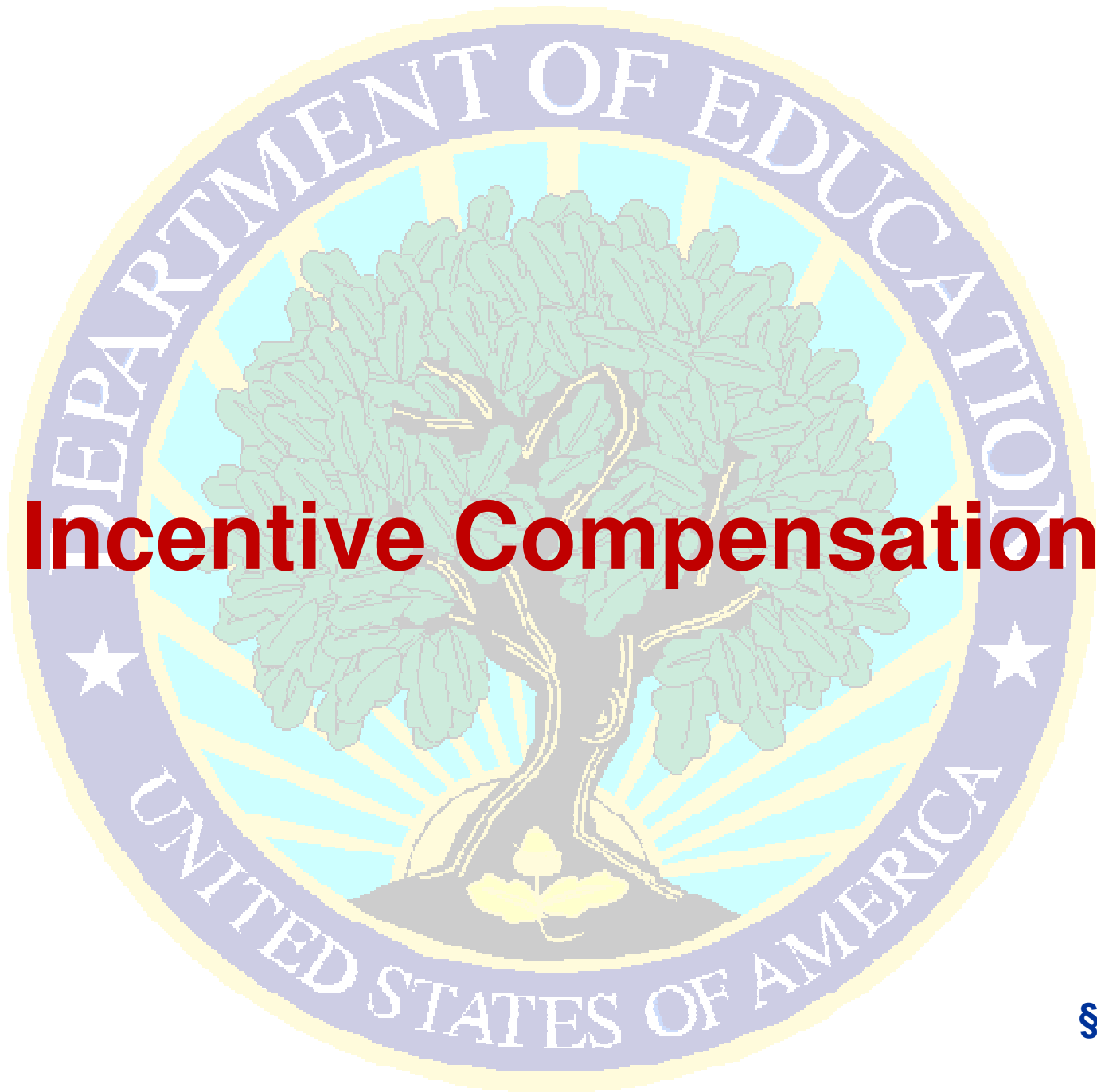
Describes misrepresentation with respect to-

- Nature of the educational program (668.72)
- Nature of financial charges (668.73)
- Employability of graduates (668.74)
- Relationship with the Department of Education (668.75)

# Misrepresentation

Not covered under the misrepresentation regulations-

- Does **not** provide an additional avenue for litigation for students, employees, and other members of the public
- Does **not** create a new Federal private right of action



# Incentive Compensation

§668.14(b)

# Incentive Compensation

## Institutional requirement-

- School will not provide a commission/bonus or other incentive payment based, in any part directly or indirectly, on success in securing enrollments or financial aid to any person or entity engaged in any student recruiting or admission activities or in making decisions regarding awarding Title IV funds

# Incentive Compensation

- Does not apply to recruitment of foreign students who reside in foreign countries and who are not eligible for Title IV aid
- Removed safe harbors
- Added definitions to clarify who, how, and what is affected
- Use questions to evaluate employee bonus or incentive payments

# Incentive Compensation

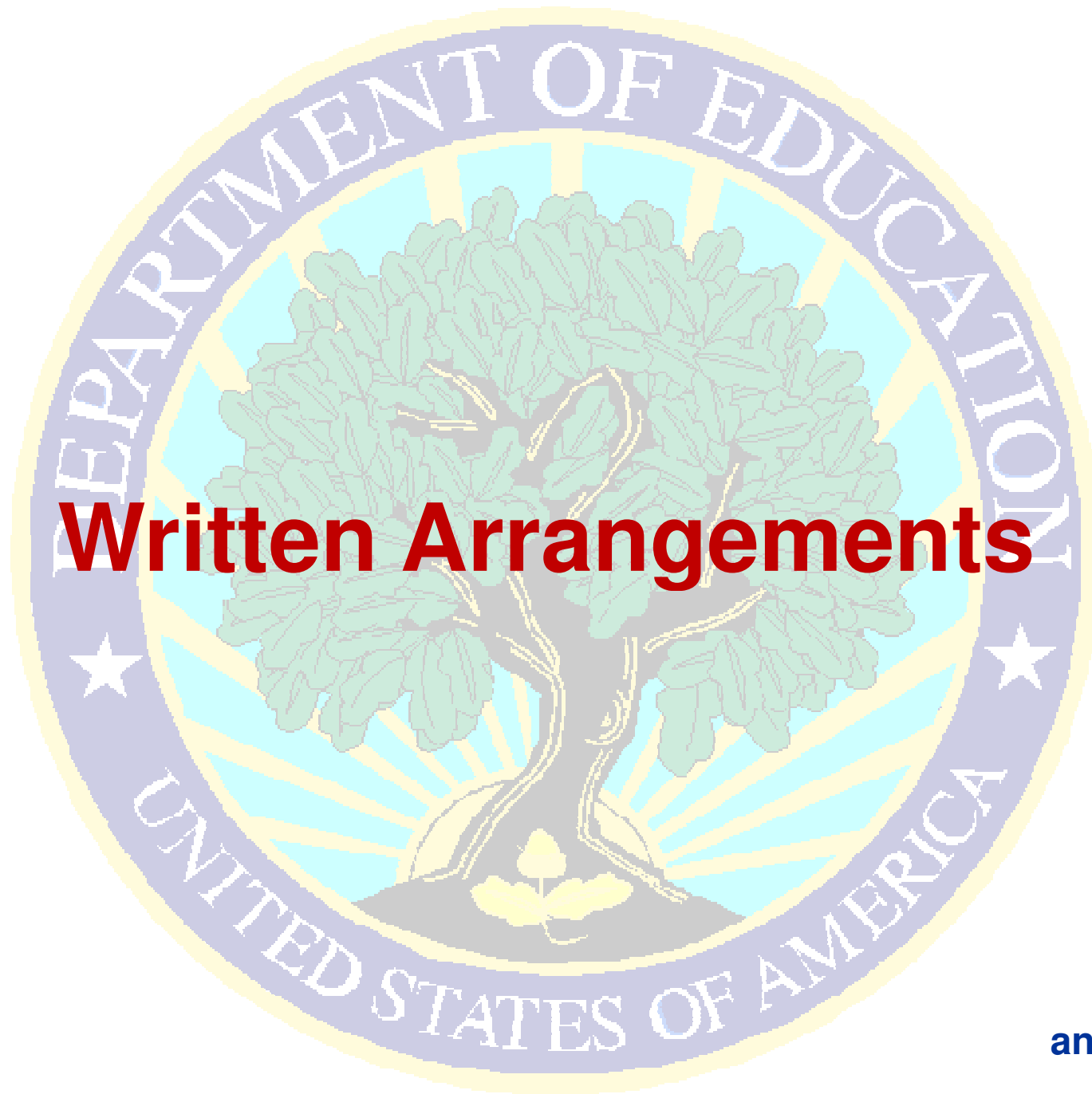
*Two-part test* to evaluate if a payment is incentive compensation-

- (1) Whether the payment is a commission, bonus, or other incentive payment, defined as an award of a sum of money or something of value paid to or given to a person or entity for services rendered; and

# Incentive Compensation

- (2) Whether the commission, bonus, or other incentive payment is provided to any person or entity based, in any part directly or indirectly, upon success in securing enrollments or the award of financial aid

If the answer to each question is “yes,” the payment would be prohibited.



# Written Arrangements

§§668.5  
and 668.43

# Written Arrangements

- Clarify that another institution may provide part—not all—of an educational program under a written arrangement
- Clarify that degree-granting institution has all necessary approvals to offer the educational program in the format in which it is being provided (i.e., distance education)

# Written Arrangements

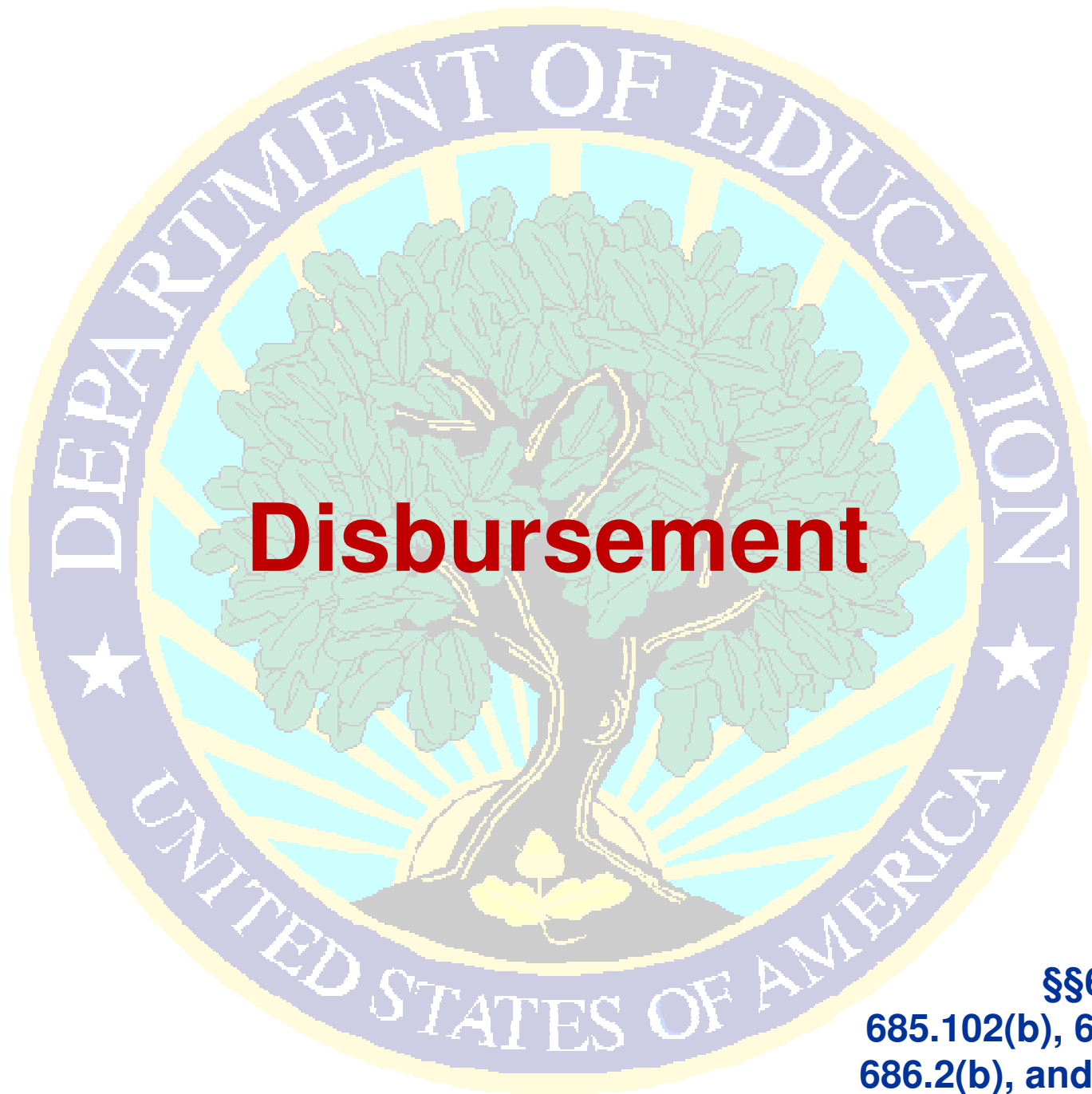
- Under written arrangements between two eligible for-profit institutions under common ownership, requires that the degree-granting institution provide more than 50% of the educational program

# Written Arrangements

- Added to the list of conditions under which a written arrangement between an eligible institution and an ineligible institution or entity is not permissible if the ineligible institution or entity-
  - Had its certification to participate revoked
  - Had its application for recertification denied
  - Had its application for certification denied

# Written Arrangements

- Requires institutions to make information available to students about-
  - Portion of the educational program provided by the nondegree-granting institution
  - Name and location of the nondegree-granting institution/organization
  - Estimated additional costs to students
  - Method of delivery



# Disbursement

§§668.164(i),  
685.102(b), 685.301(e),  
686.2(b), and 686.37(b)

# Disbursement

- For Pell Grant eligible students
- Offers a way to purchase required books and supplies-
  - If institution could disburse 10 days before payment period and credit balance would result
  - Must provide by 7<sup>th</sup> day of payment period

# Disbursement

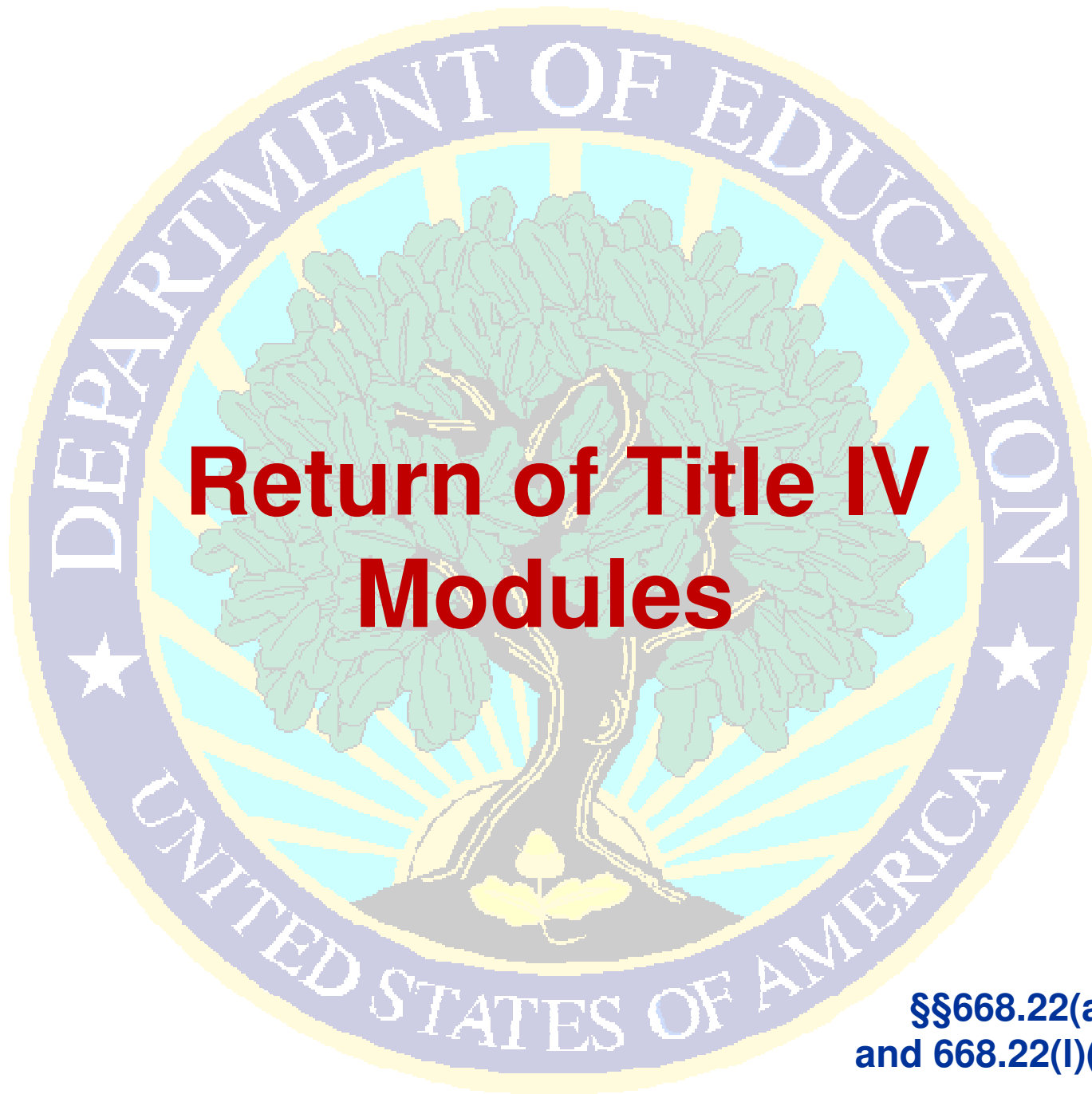
- Student must be able to buy books and supplies by 7<sup>th</sup> day of payment period unless the institution knows the student isn't attending
- May use stored value card, prepaid debit card, or book store voucher

# Disbursement

- No change in R2T4 treatment
- If funds have been credited and student doesn't begin attendance, institution must return funds according to §668.21
- If funds have been credited and student withdraws, institution must return funds according to R2T4

# Disbursement

- Counseling required under §668.16(h)
- Disclosures required under §§668.42 and 668.165(a)(1)
- Policy required under §668.164(i) must specify-
  - How a Pell-eligible student can opt out
  - That no written authorization required if a student purchases books using the institution's system



# Return of Title IV Modules

§§668.22(a)(2)(i)-(iii)  
and 668.22(l)(6) and (8)

## R2T4 - Modules

- “Offered in modules” defined as-
  - Course or courses in a program that do not span the entire length of payment/enrollment period

## R2T4 – Modules

- For credit hour or clock hour programs-
  - Withdrawn if doesn't complete all days in payment/enrollment period scheduled to complete prior to withdrawing

## R2T4 – Modules

- To calculate percentage of payment period/enrollment period completed for credit hour programs:
  - Include calendar days scheduled to be completed regardless of whether any course was completed that is less than the length of the term
    - Excludes scheduled breaks of at least 5 consecutive days

## R2T4 – Modules

- Student who ceases attending a module but who confirms that he/she will attend a module beginning later in the same payment/enrollment period is not considered a withdrawal
- Must get confirmation when ceases attendance
- For non-term and nonstandard-term programs, must attend module no later than 45 days after ceasing attendance

## R2T4 – Modules

To determine if a student in a program with modules has withdrawn, ask 3 questions:

- (1) Did the student cease to attend or fail to begin attendance in a course scheduled to attend? (If yes, go to question 2.)

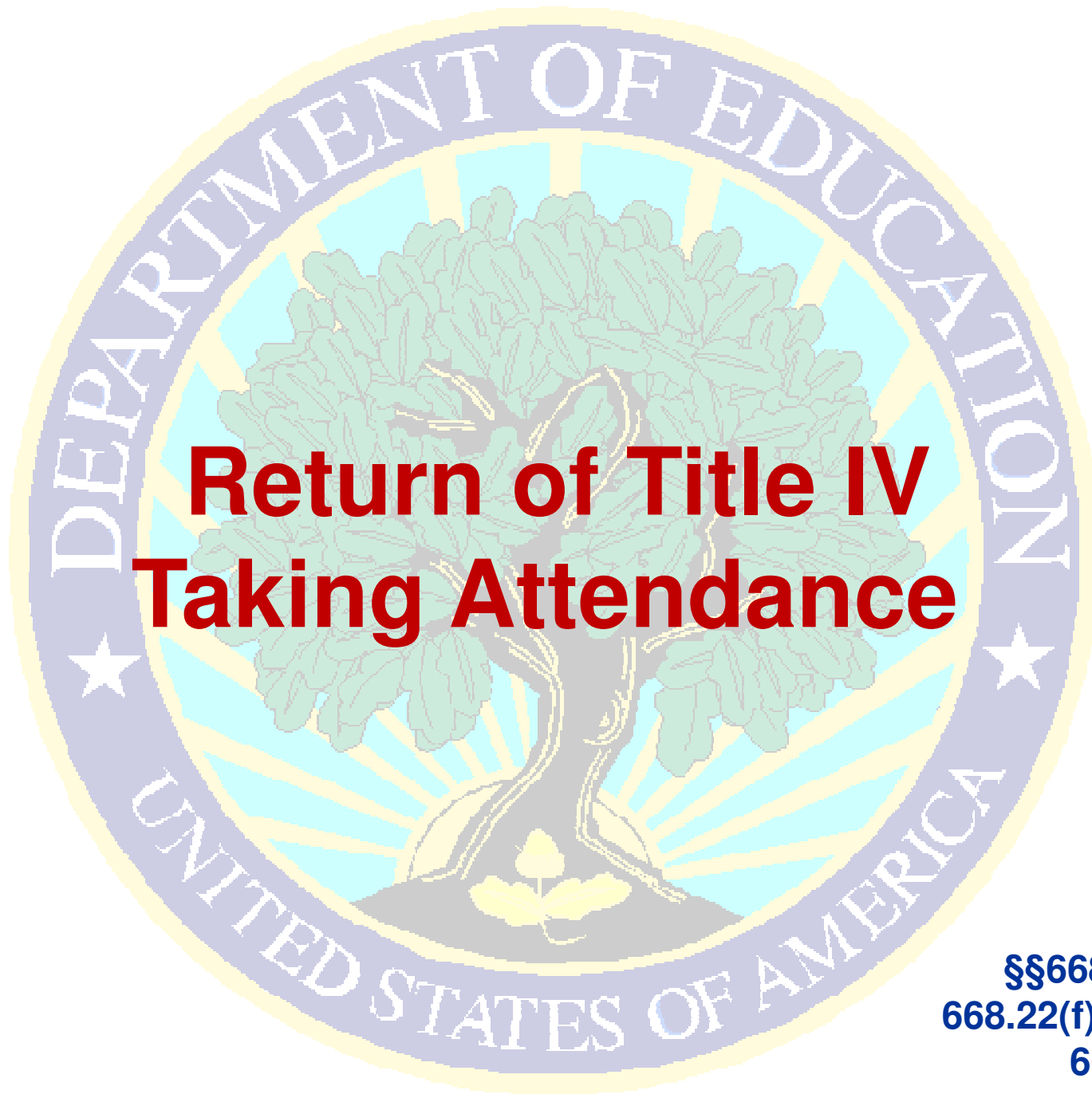
## R2T4 – Modules

- (2) When ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses? (If no, go to question 3.)

## R2T4 – Modules

- (3) Did the student confirm attendance in a later module in the payment/enrollment period (45 day rule, if applicable)?
  - If no, student is a withdrawal

If not a withdrawal, Pell recalculations may apply.



# Return of Title IV Taking Attendance

§§668.22(b)(3),  
668.22(f)(2)(i), and  
668.22(l)(7)

## R2T4 – Attendance

An institution is required to take attendance if an outside entity or the institution itself-

- Requires instructors to take attendance, or
- Has a requirement that can only be met by taking attendance or a comparable process

## R2T4 – Attendance

Attendance must be “academic attendance” or “attendance at an academically-related activity”

Including-

- Physically attending class
- Submitting academic assignment
- Taking exam, interactive tutorial or computer-based instruction

## R2T4 – Attendance

Attendance must be “academic attendance” or “attendance at an academically-related activity”  
Including- (more)

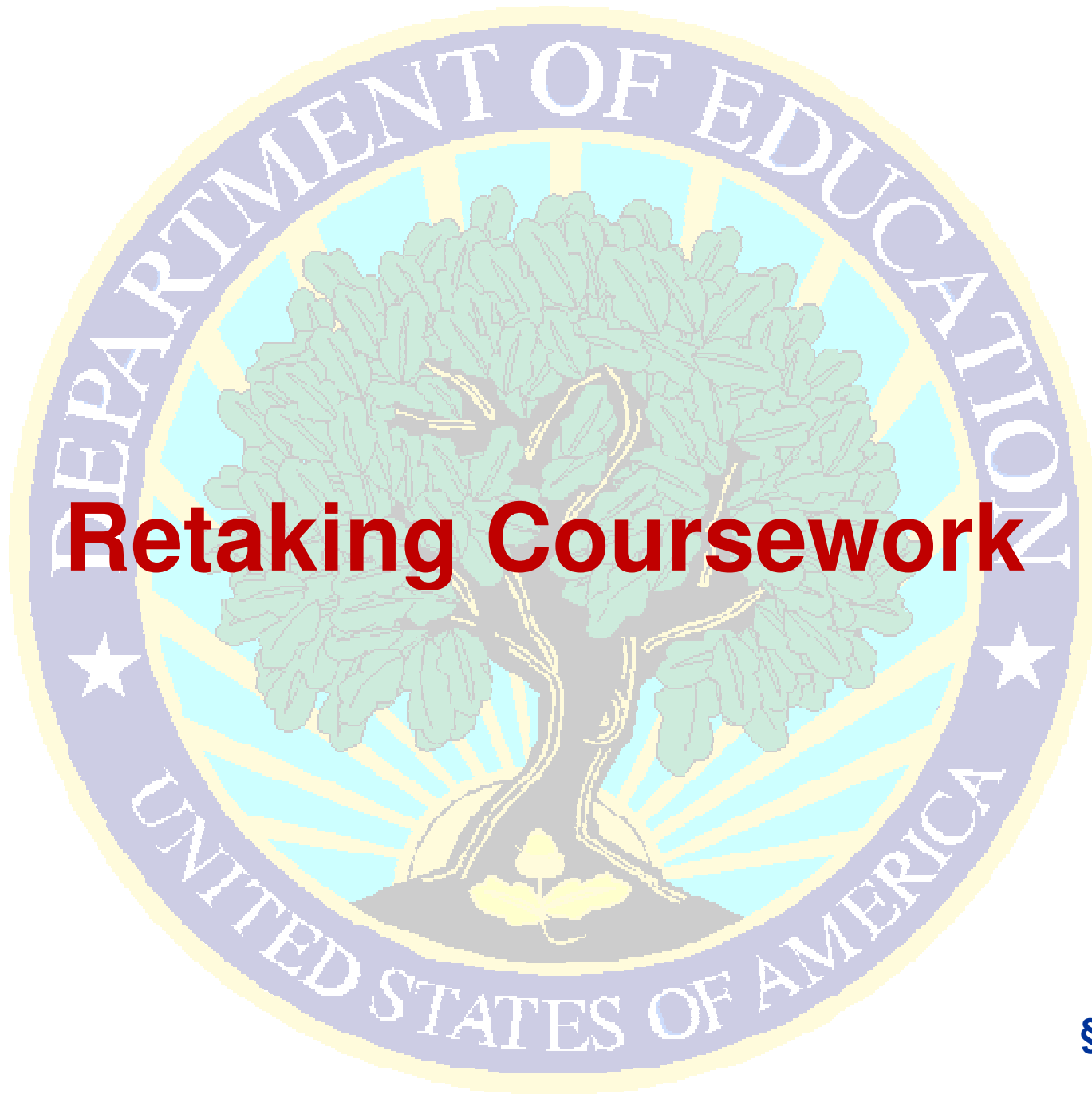
- Attending school assigned study group, or
- Participating in online discussions about academic matters and/or initiating contact with faculty to ask questions about subject matter

## R2T4 – Attendance

Attendance does NOT include—

- Living in institutional housing
- Using meal plan
- Logging into an online course without active participation
- Academic counseling

Student's certification of attendance without school documentation is not acceptable.



# Retaking Coursework

# Retaking Coursework

- Affects programs at term-based institutions
- Amends full-time student definition
  - Describes courses included in determining enrollment status for Title IV, HEA program purposes

# Retaking Coursework

- Current: pay for unlimited retakes of failed classes only
- NPRM: pay for any coursework previously taken
- Final rule: pay for one retake of any previously passed course

# Retaking Coursework

- Final rule
  - More expansive than current policy
  - More restrictive than NPRM
- Changed due to additional information about some institutional practices



# High School Diploma

# High School Diploma

New requirement for institutions to develop and follow procedures to evaluate a student's high school completion if-

- The institution or the Secretary has reason to believe the high school diploma was not obtained from an entity that provides secondary school education

# High School Diploma

Public comments revealed some confusion

- Not a requirement to collect HS diplomas
- No ED master list
- Does not apply to home-schooled students

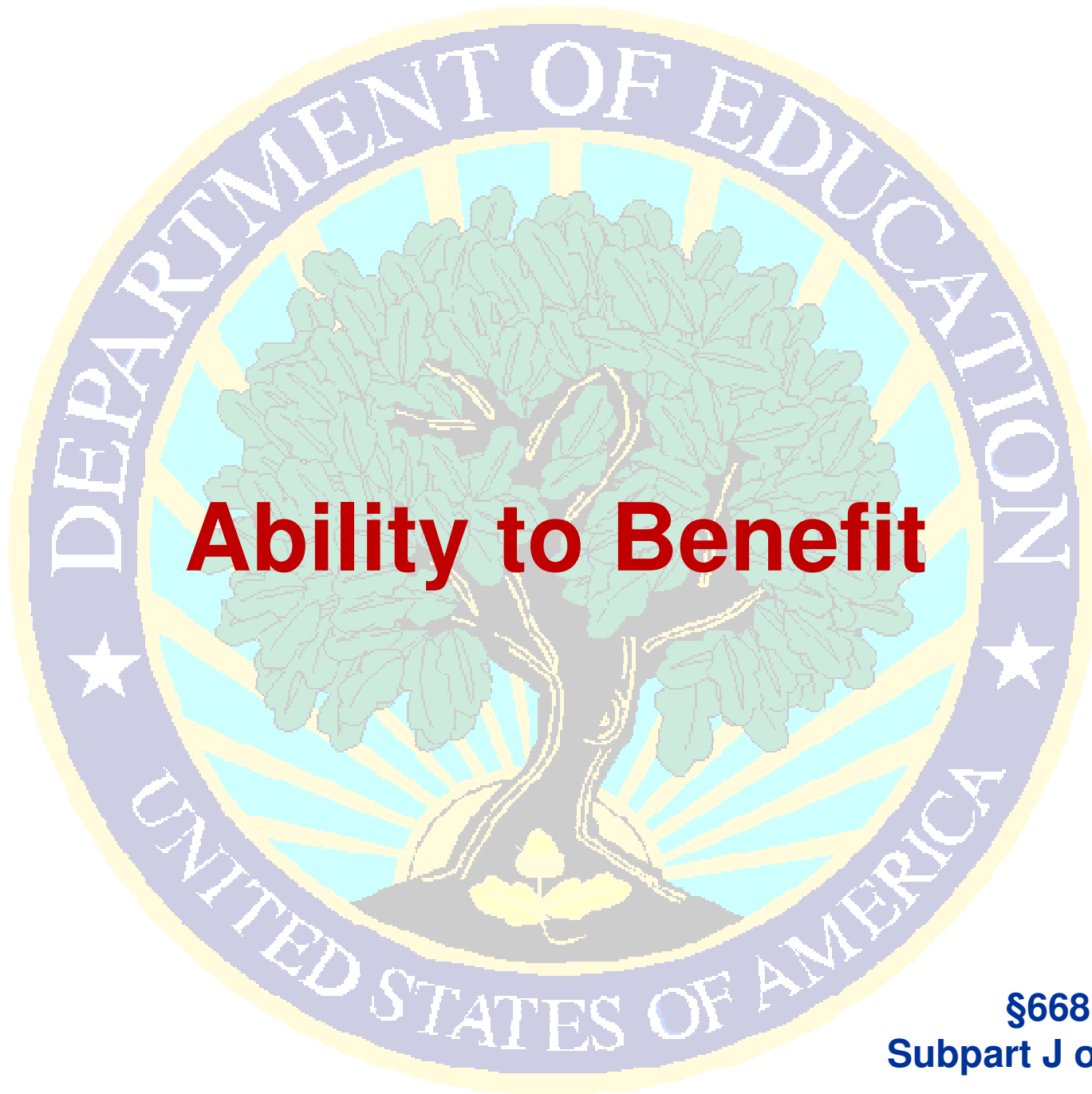
# High School Diploma

Beginning with the 2011-12 FAFSA-

- Limited collection via FOTW for first time filers
- Specify HS name and city/state
- Select from drop-down list or write-in
  - Populated by NCES lists

# High School Diploma

- If high school does not appear on NCES lists, documentation may include:
  - HS diploma, and
  - Final transcript showing the courses the student completed
- Student-certification is not sufficient
- No appeal process in regulations
- Alternatives to HS diploma



# Ability to Benefit

§668.32(e) and  
Subpart J of Part 668

# Ability to Benefit

- New ATB option
  - Completing hours applicable to an eligible degree or certificate offered by the institution
  - 6 semester, trimester, or quarter hours OR 225 clock hours

# Ability to Benefit

- Can pay after completion of hours
- Can pay like a transfer student
- Cannot pay back to the beginning of the payment period
- “Testing out” does not satisfy completion of hours

# Ability to Benefit

- If school admits students with recognized equivalent of HS diploma OR under an ATB option, it cannot fail to accept the satisfactory completion of 6 credit hours or equivalent coursework that is applicable toward a degree or certificate at that institution

# Ability to Benefit

## New and revised definitions

- “assessment center”
- “independent test administrator”
- “individual with a disability”
- “test”
- “test administrator”
- “test publisher”

# Ability to Benefit

- Consolidated approval processes for test publishers and states
- Procedures for handling test score irregularities
- Procedures to accommodate individuals with disabilities
- Revisions to test approval procedures



# **Satisfactory Academic Progress**

**§§668.16(e),  
668.32(f), and 668.34**

- Previously, SAP requirements and references were included in 3 regulatory sections
  - Administrative capability §668.16(e)
  - Student eligibility §668.32(f)
  - Satisfactory progress §668.34
- Now all requirements are in §668.34 with cross references in §§668.16(e) and 668.32(f)

## New regulations provide-

- Continued flexibility for institutions in establishing their SAP policies
- Additional flexibility for institutions that monitor SAP more often than annually
- Definitions for “warning” and “probation”
- In general, a student who is not making SAP is no longer eligible for Title IV aid

## SAP policy requirements

Specified in §668.34 and include-

- Measurement of student's progress at each evaluation-
  - Can take place each payment period, annually, or less often than each payment period
  - Must occur at the end of a payment period

## SAP policy requirements (more)

- GPA that a student must achieve at each evaluation (qualitative standard)
- Pace of progression to ensure completion within the maximum time frame (quantitative standard)
  - Pace is measured at each evaluation

## SAP policy requirements (more)

- How student's GPA and pace are affected by incompletes, withdrawals, repetitions, or transfers of credits
- Institutions to count transfer hours accepted toward completion of the student's program as both hours attempted and hours completed

## SAP policy requirements (more)

- Description of and conditions surrounding “warning” and “probation” statuses, if used
- The specific elements and process required for appeal
- How a student can reestablish eligibility

## Financial Aid Warning

- Status assigned to a student who fails to make SAP at an institution that evaluates SAP at the end of each payment period
- Student may continue to receive Title IV aid for one payment period
- No appeal necessary

## Financial Aid Probation

- Status assigned by an institution to a student who fails to make SAP and who has appealed and has had eligibility for Title IV aid reinstated
- Institution may impose conditions for student's continued eligibility to receive Title IV aid

## Appeal

- Process by which a student who is not meeting an institution's SAP policy petitions the institution for reconsideration of the student's eligibility for Title IV aid
- Must specify the conditions under which a student may appeal

## Appeal (more)

- The student's appeal must include-
  - Why the student failed to make SAP; and
  - What has changed that will allow the student to make SAP at the next evaluation

## Institutions that evaluate SAP each payment period

- Student loses eligibility for Title IV aid
- Student may be placed on Financial Aid Warning for one payment period
- Student must make SAP or may be placed on Financial Aid Probation after an appeal

## Institutions that evaluate SAP each payment period (more)

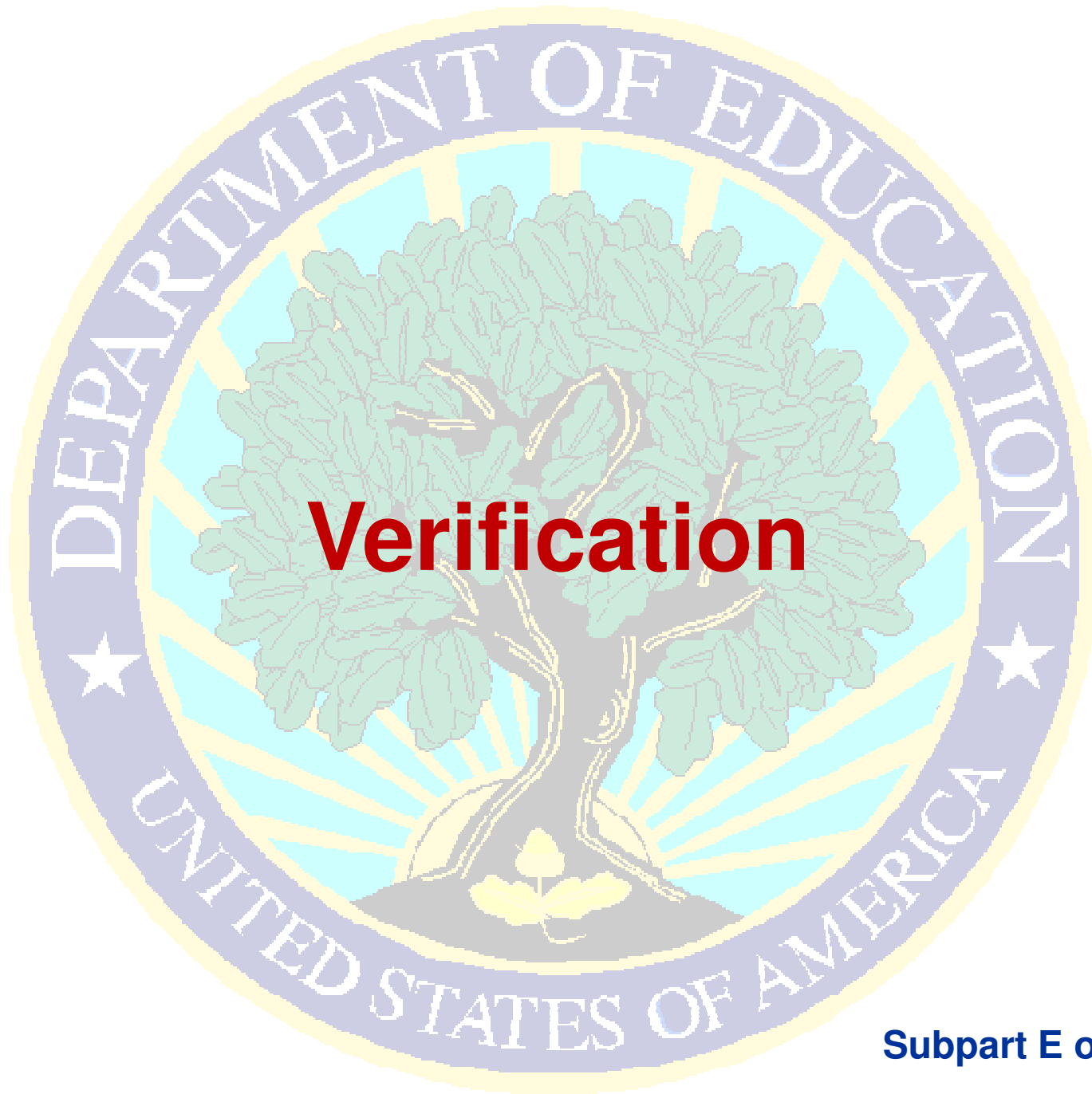
- After Financial Aid Probation-
  - The student must be making SAP, or
  - Must be successfully following an academic plan

## Institutions that evaluate SAP less often than each payment period

- Student loses eligibility for Title IV aid
- Student may be placed on Financial Aid Probation after an appeal
- After Financial Aid Probation, the student must be making SAP or successfully following an academic plan

## Notifications

- Institution must notify student of results of SAP review that impacts the student's eligibility for Title IV aid
- If the institution has an appeal process, must describe the specific elements required to appeal SAP
- If the institution does not have an appeal process, must describe how a student who has failed SAP reestablishes eligibility for Title IV aid



# Verification

# Verification

- Effective date delayed until July 1, 2012
  - 2012-13 award year
- Institutions may need time to make changes to their institutional processing systems

## General changes

- Removes references to individual programs
- Codifies long-standing policy in regulations
- Uses “FAFSA information” instead of “application”

# Verification

Defines “subsidized student financial assistance programs”  
and “unsubsidized student financial assistance programs”

- Subsidized—
  - Eligibility uses EFC
  - Verification applies
  - Pell, FSEOG, FWS, Perkins, Subsidized Loan
- Unsubsidized—
  - Eligibility does not use EFC
  - Verification does not apply
  - TEACH Grant, Unsubsidized Loan, PLUS Loan

# Verification

- Must complete verification prior to exercising professional judgment
- Defines “specified year” as base year or year prior to base year
  - Allows for option of using income data from a different year

# Verification

## Selection

- Eliminates 30% limit
- Department targeting error-prone items to select applications to verify
- Institutions must verify all applicants we select
- Annual Federal Register notice will list data elements that may be selected

# Verification

## Selection (more)

- Institutions must continue to verify information they believe is inaccurate
- Institutions keep flexibility to select additional information or applications for verification

## Exclusions

- Removes certain exclusions
- Lists specific situations when parent's or spouse's information is not subject to verification
- Restructures to clarify provisions applicable to-
  - Applicants
  - Parents of dependent applicants
  - Spouses of independent applicants

## Updating

- Applicant required to update all changes in dependency status throughout the award year, except changes resulting from a change in the applicant's marital status
- Applicant's responsibility, not institution's
- FAA may require applicant to update marital status to address inequity or to reflect more accurately the applicant's ability to pay

# Verification

## Items to verify

- Annual Federal Register notice
  - Items to verify
  - Documentation
- Initially, will include the current five data elements

## Documentation

- Specified as acceptable in annual Federal Register notice
- Retained current documentation requirements with technical changes
- Added option to retrieve electronic data from IRS

## Documentation (more)

- For applicants with tax filing extension
  - May require completed tax return when filed
  - Must reverify AGI and taxes paid, when/if the tax return is submitted

## Documentation (more)

- Tax return not signed by the tax filer
  - Must be signed or stamped by the tax preparer and
  - Contain the preparer's SSN, EIN or PTIN

## Interim disbursements

- Technical and conforming changes
- May make a disbursement after completing verification but prior to receiving a corrected ISIR if the changes would not change the amount of aid
- To avoid liability, must ensure all corrections are submitted to ED

## Deadlines

- Require institutions to follow cash management procedures for Direct Loans
- Removed the requirement to pay Pell Grant on the higher EFC

## Recovery of funds

- Require institution to reimburse program account if disbursement made without receiving corrected SAR or ISIR

## Changes in FAFSA information

- Removed \$400 tolerance
- Require all corrections over \$25 to be submitted



# Contacts

# Contacts

- State authorization
  - Fred Sellers (202) 502-7502 or [Fred.Sellers@ed.gov](mailto:Fred.Sellers@ed.gov)
- Credit hour
  - Fred Sellers (202) 502-7502 or [Fred.Sellers@ed.gov](mailto:Fred.Sellers@ed.gov)
- Gainful employment
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# Thank You

