

## **Questions from Participants of Webinar 3 - Program Integrity Regulations**

Q: Can merit raises for admissions personnel be given more than once a year?

A: Perhaps, if that is the institution's process for other personnel as well, but the institution should be very careful. ED has indicated that any "salary adjustments that take the form of incentive payments based directly or indirectly on success in securing enrollments or financial aid" are prohibited (GEN-11-05, Table 2).

Institutions should also note that the regulations clearly state that "an employee who receives multiple adjustments to compensation in a calendar year and is engaged in any student enrollment or admission activity or in making decisions regarding the award of title IV, HEA program funds is considered to have received such adjustments based upon success in securing enrollments or the award of financial aid if those adjustments create compensation that is based in any part, directly or indirectly, upon success in securing enrollments or the award of financial aid." See the discussion on page 66876 of the preamble and the final regulation, §668.14(b)(22)(i)(B) on page 66950.

Q: If a school hires all [their?] personnel with a 90 day probation period and a compensation review at the end of the 90 days can the school review the compensation of admissions representatives at the end of the 90 day probation period?

A: If the 90-day probationary period applies to all staff, and all staff have a possible raise after this period, then it should not be an issue to treat admissions staff in the same manner (provided you do not include success in securing enrollments as one of the evaluation factors). As stated above, though, institutions should note that any "salary adjustments that take the form of incentive payments based directly or indirectly on success in securing enrollments or financial aid" are prohibited (GEN-11-05).

Q: Can raises be given to admissions personnel who have been promoted such as from senior to master representative or to an assistant admissions manager?

A: A school can have different levels of staffing in the admissions office, and staff may be promoted accordingly, provided the promotions are not based on success in securing enrollments (refer to GEN-11-10, question 2 and table 2). The institution should ensure that the different titles truly reflect different positions or levels of responsibility. In other words, the promotions really need to be to different jobs, not just a change in title and salary. See page 66876 of the preamble: ". . .the Department recognizes, for example, that institutions often maintain a hierarchy of recruitment personnel with different amounts of responsibility. . .it may be appropriate to have salary scales that reflect an added amount of responsibility."

Q: How do we deal in the case when student is a refugee from Iraq? The student stated that he/she finished the HS but student cannot provide an HS diploma due to the fact that his/her school was burned or destroyed from war.

A: The new regulations require schools to develop and follow procedures to validate the validity of a high school diploma when either the school or ED has reason to suspect the diploma's legitimacy. ED is not requiring schools to collect documentation of a high school diploma or transcript on every financial aid recipient, and permits schools to consider various kinds of documentation in its procedures.

In situations where students are unable to obtain any documentation of a high school diploma, an institution should address this in its admission standards. There is nothing in federal regulations to prevent an institution from accepting a student's certification of high school completion. The institution could also accept the student using an ATB test or the new 6-credit alternative (assuming the school allows ATB admissions). Schools should consider state and accrediting agency requirements as well.

Some institutions may want to establish a policy to require students to obtain a GED in these types of situations, either prior to or after admission, so that the student has a readily recognizable and acceptable credential at hand for future situations, including entering the military or employment.

Q: What is ACCET's processing time for the Doc 25.9 applications? Does the school need to wait until receipt of the approval from ACCET to fund T4 funding under one of the options

A: From ACCET: The review of Document 25.9 is a new process for ACCET, and we have no way of projecting the number of applications or the timing of their submission. There is the possibility that hundreds will be submitted. Therefore, we are unable to provide a maximum timeframe for their review. With that said, we highly recommend that institutions submit the completed Document 25.9 ASAP. It is not a requirement of ACCET that an institution wait until the review of Document 25.9 is complete before disbursing Title IV funding after July 1, 2011.

From Kris Strom: The school is not required to wait until ACCET completes its review to use ACCET's option 4 (30:1 or 20:1 for clock/credit hour conversion). However, if ACCET finds that the institution did not document a sufficient amount of homework, or finds either systemic noncompliance or significant noncompliance during an on-site visit, they would be required to notify the US Department of Education. Institutions will want to be very sure that they have met the ACCET requirements regarding documentation and documented a sufficient number of hours of homework.

Q: If a student fails a course, then retakes and passes, do we have to include credits from BOTH attempts in the GPA?

A: Yes. This is a current federal requirement that is unchanged by the new PI regulations. See the FSA Handbook, Volume 1, Chapter 1, page 1-12:

Your policy must explain how course repetitions are handled, such as whether only the highest or most recent grade counts. While you can exclude grades for prior attempts (repeat/delete) when calculating a student's GPA, you must include the credits from all attempts when assessing if the student meets the quantitative SAP standard.

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