

Comprehensive Transition and Postsecondary (CTP) Program: The Process and Lessons Learned

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Current Work to Support Students with Intellectual Disabilities

- Title VII – discretionary grants – Office of Postsecondary Education (OPE)
 - TPSID 84.407A
 - Coordinating Center 84.407B
 - <http://www2.ed.gov/programs/tpsid/index.html>
- Title IV – financial aid – Federal Student Aid (FSA)
 - <http://www.ifap.ed.gov/ifap/index.jsp>



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Title IV Programs – Financial Aid

- HEOA allows an eligible student with an intellectual disability attending an eligible comprehensive transition and postsecondary program (CTPP) to receive:
 - Federal Pell Grant,
 - Federal Supplemental Education Opportunity Grant, and
 - Federal Work-Study programs funds
- Implementing regulations developed through negotiated rulemaking process



Three Pieces

Related to How Students get Financial Aid

- Student has to be an eligible student with an ID
- Student has to be eligible to receive financial aid
 - Apply for title IV eligibility with their FAFSA
 - <http://www.fafsa.ed.gov/>
- Program must be an approved CTP Program
 - Apply to update their program through their E-app
 - <http://www.eligcert.ed.gov>
 - Internal review by FSA
 - External review by professionals with expertise in CTP – offer recommendations
 - 4-6 week process - iterative; institutions can reapply if they are not initially approved



An Eligible Student with an Intellectual Disability

- Defined in section 760 of the HEOA (with slight modifications)
 - A student:
 - With mental retardation or significant cognitive impairment AND
 - Who is/was eligible for FAPE under IDEA
- Private/home-schooled students
- Institution determines if student meets the definition



An Eligible Student: *Qualifying to Participate in Financial Aid Programs*

- Must be enrolled in an approved CTP Program
 - Must meet all of the general student eligibility requirements under section 668.32 **EXCEPT:**
 - Does NOT have to be enrolled for the purpose of obtaining a degree or certificate
 - Is NOT required to have a high school diploma or have passed an ability-to-benefit test
 - Must maintain satisfactory academic progress under school's policy for students in the CTP
 - Documentation must demonstrate that student has an intellectual disability



An Eligible Program

- Defined in section 760 of the HEOA (with slight modifications)
- Must:
 - Be offered by a participating title IV IHE
 - Be designed to support students with intellectual disabilities (ID)
 - Include an advising and curriculum structure
 - Require students with ID to participate in courses and activities with students without disabilities



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The FSA Process: IFAP Electronic Announcement 2010-06-21

- Program representatives and Federal Aid Administrators work closely
- Update application through E-App
 - Complete Sections A, E, and L (CIP code = 30.9999)
 - Provide the following supporting documentation:
 - Description of CTP program which includes a description of credential received
 - Satisfactory academic progress policy
 - Letter to accrediting agency
 - Signature page (Section L of E-App)

Satisfactory Academic Progress (SAP)

- An institution that offers a comprehensive transition and postsecondary program applies under the provisions in 34 CFR 600.20 for adding a new educational program, and must include with its application--
 - **(b) The institution's policy for determining whether a student enrolled in the program is making satisfactory academic progress;**

Satisfactory Academic Progress (SAP)

- ❑ Work with Federal Student Aid officials at your school
- ❑ Use the FSA Handbook www.ifap.ed.gov . (*Volume 2, Chapter 10 - Administrative Capability*).
- ❑ Include:
 - An explanation regarding how the institution's current SAP policy is similar or dissimilar to the SAP Policy pertinent to the CTP Program.
 - A description of the length of time in which students are expected to complete program, including the number of hours or credits that are required to complete the program.
 - A description of the minimum number of credits or hours that a student can take during one semester and a statement related to the percentage of time it would take students to complete the program based on this minimum number of hours.

SAP Continued. Include:

- A statement regarding any prerequisites that may be required for the program.
- A description of the framework or system that programs use to measure student progress, such as a grading system or performance rubric. Include how the program will use student data to make decisions about student promotion, course selection, etc. Sample protocols and assessment instruments can be included as appendices.
 - Explain the criteria that the program will use to assess whether a student meets a performance target. For example, if a Pass – Fail/Not Achieved performance target is in place, institutions may describe how students achieve a Pass, or under what circumstances students would receive a Fail/Not Achieved rating.
- A description of the policy for addressing students who do not complete course content or who withdraw from a course.
- A description regarding how the institutional financial aid office will monitor this policy for the CTP Program.
- A description of the procedures or steps that students can take to appeal decisions made under the program’s SAP Policy.
- A description regarding how course repeats are treated. For example, does the program drop the original grade and replace it with the new grade?
- Refrain from using non-specific terms to describe timeframes. For instance, do not say *the student is expected to complete 64 credits in the allotted time*. Explain what “allotted” time means.

Process Regarding Program Description

- Iterative
 - Dialogue across OPE/FSA and program to ensure all pieces are included
 - May take time
- Interest in a Valid and Reliable Process
- Student eligibility starts with the academic term during which the approval is received, even if the term has already started. The eligibility would not apply to terms or payment periods prior to that time.



Related Issues

- ❑ No interruption in federal aid when an application to add a CTP program is submitted.
- ❑ At the current time, there is no reporting requirements that are specific to the CTP program.
- ❑ If institution submits several requests for program updates, each update is handled one at a time – so, this could delay addressing CTP update.

Lessons Learned

- Applications reviewed internally and externally
 - Work with Federal student aid colleagues
 - Label each attachment with institutional name
 - Use page numbers – institutional name in header
 - Provide each requirement in a separate document
 - Be explicit – provide examples
 - Such as: example of outcomes, data, materials related to advising & curriculum.
 - Include supporting materials
 - Ensure you address all components of definition
 - Review final regulations – analyses of comments -
<http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi>



Interview with a Project Director

- ❑ Describe how you worked with colleagues from across your institution to submit your application.
- ❑ What were the challenges?
- ❑ Were there any surprises?
- ❑ What suggestions would you provide colleagues from other institutions who have not yet submitted their FSA application?



THANK YOU

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