

Dual Enrollment QUESTIONS & ANSWERS

Student Eligibility:

DE-Q1. Do Pell Grant funds received under the experiment count towards the student's 600% Pell Lifetime Eligibility Used (LEU)?

DE-A1. Yes. LEU provisions were not waived for this experiment.

DE-Q2. Is a home-schooled student eligible for the experiment?

DE-A2. To participate in the experiment, students must be considered legally enrolled under state law in a public secondary school. If the state does not consider a homeschooled student as legally enrolled in the public secondary school with which the postsecondary institution has a dual enrollment arrangement, then that student is not eligible for Pell Grant funds under the experiment.

DE-Q3. Must a student be a matriculating student in order to receive Pell Grant funds under the experiment?

DE-A3. The experiment requires the dually enrolled student to be enrolled in a Title IV-eligible postsecondary program as a regular student, as defined by 34 CFR 600.2. The institution can only award Pell Grant funds for the student's coursework that applies towards completion of the postsecondary program in which the student is enrolled at the participating institution.

DE-Q4. Does a Title IV credit balance need to be disbursed to the student under the experiment?

DE-A4. Yes. The experiment requires that any Title IV credit balances be paid to the student under the normal requirements of 34 CFR 668.164.

DE-Q5. Can a student receive Pell Grant funds under the experiment for postsecondary education courses taken during a period when the student is not also attending high school (for example, a summer term)?

DE-A5. Yes, if the student has not yet received their high school diploma (e.g. attending the postsecondary institution between their junior and senior high school years) and the institution has no reason to believe that the student will not continue enrollment in their high school during the next enrollment period.

DE-Q6. Please provide more information about the requirement that an institution must offer students the opportunity to earn the equivalent of 12 postsecondary credit hours while also enrolled in a public secondary school.

DE-A6. In order to meet the requirements for the experiment, the institution is required to make available to dually-enrolled students coursework that constitutes at least 12 credit hours while the students are still enrolled in secondary school. The experiment does not require an individual student to actually enroll in 12 credit hours, nor does it limit students from enrolling in more than 12 credit hours.

Institutional Eligibility:

DE-Q7. The November 3, 2015 Federal Register notice states that an institution must have a dual enrollment arrangement with one or more LEAs or public secondary schools. May an institution also have an arrangement with a private high school?

DE-A7. No. An institution must have an arrangement with a public secondary school or a local educational agency. An institution may not provide Pell Grants to students who are enrolled in private secondary schools under the Dual Enrollment experiment.

DE-Q8. If a student who receives Pell Grant funds under the experiment has any remaining institutional charges after all financial assistance, including the Pell Grant, have been applied to the student's account, can the institution bill the student for that remaining amount?

DE-A8. No. Participating institutions must ensure that after all financial assistance, Pell Grants, State, or institutional aid, have been applied to a Pell Grant recipient's institutional charges, the student (including the student's family) is not responsible for any remaining institutional charges as a result of enrolling in the postsecondary program, including any withdrawal fees charged to students who withdraw from the postsecondary institution.

DE-Q9. If a high school student receives Pell Grant funds under the experiment, but subsequently becomes ineligible for federal Pell Grant funds (e.g. as a result of a higher EFC in a subsequent award year or a reduced enrollment status during the same award year), must the institution continue to ensure that the student is not responsible for any remaining institutional charges as a result of enrolling in the postsecondary program?

DE-A9. Once a student in the experiment receives Pell Grant funds for any payment period in an award year, the institution is required to ensure that the student is not responsible for institutional charges as a result of enrolling in the postsecondary program as part of the institution's dual enrollment arrangement for that payment period and for all subsequent payment periods assigned to that same award year.

However, if such a student is ineligible for Pell Grant funds in a subsequent award year, the institution can choose to make the student responsible for remaining institutional charges for enrollment in dual enrollment courses during that subsequent award year.

Example: A student receives a Pell Grant during the fall semester for half-time enrollment. Then, during the spring semester the student enrolls less than half-time and, based on the Pell payment and disbursement schedules and the institution's Pell Grant cost of attendance, the student is not eligible for a Pell Grant

disbursement in the spring. Although the student may not be eligible for Pell Grant funds during the spring semester due to enrollment status, the student cannot be held responsible for any institutional charges for the spring semester or any subsequent enrollment period that is considered by the institution to be part of that same award year.

However, if the same student then completed a FAFSA for the following award year and was determined to be ineligible for Pell Grant funds for that award year, the institution may, if the institution chooses, consider the student responsible for institutional charges for enrollment in dual enrollment courses for that subsequent award year.

DE-Q10. Under the experiment, a dually-enrolled student who receives Pell Grant funds cannot be responsible for any remaining charges after all financial assistance has been applied to the student's institutional charges. Does this restriction apply to a balance that a student might owe the institution after the student withdraws from the postsecondary program, including when the institution returns Pell Grant funds to the Department as a result of a Return of Title IV Funds calculation?

DE-A10. No. In very limited circumstances, a student may be held responsible for institutional charges when the student withdraws, the institution is required to return all or a portion of the student's Pell Grant funds to the Department as a result of a Return of Title IV Funds calculation, and the institution's policies do not permit the student's tuition to be refunded.

However, as described above in DE-A8, a student may not be held responsible for withdrawal fees or other charges that result from the student's withdrawal. An institution is also required to disclose to students the possibility that they could be responsible for institutional charges if they withdraw, and will be asked to report to the Department the amounts charged to dually enrolled students as a result of student withdrawals.

DE-Q11. Please explain the requirement that participating institutions must use any Pell Grant funds received to supplement and not supplant public and institutional sources of funding that were used to support the institution's dual enrollment program(s).

DE-A11. Under the terms of the experiment, existing public and institutional funding supporting an institution's dual enrollment programs must, at a minimum, be sustained while the institution participates in the experiment. Tuition waivers or State funds applied toward tuition would count as part of an institution's existing funding for dual enrollment. This could be accomplished if the institution expanded the number of dual enrollment students it enrolls and/or offered more student support services, such as college transition counseling, academic counseling, and tutoring. To monitor this "supplement not supplant" requirement, the Department will require institutions to submit annual reports that detail the sources and amounts of funding used in support of its dual enrollment programs.

DE-Q12. Does approval by the Department of Education to participate in the Dual Enrollment experiment mean that the institution and the high school are not subject to any State or local requirements related to dual enrollment?

DE-A12. No. Participation in this experiment does not relieve the participants of any State, local, or other legal requirements.

DE-Q13. Is an institution required to provide any additional disclosures to students as a result of its participation in the Dual Enrollment experiment?

DE-A13. An institution participating in the Dual Enrollment experiment is required to comply with all applicable consumer disclosure requirements under 34 CFR 668.41-49 with respect to both current and prospective students who are enrolled in secondary school. The institution is also required to provide additional disclosures to those students related to the institution’s participation in the experiment, including:

- That the institution is participating in an experimental program authorized by the Department that permits it to provide Pell Grant funds to students who are enrolled in secondary school;
- That the Pell Grant funds that each student receives while enrolled in secondary school will apply toward the student’s Lifetime Eligibility Used;
- The possibility that a student could be responsible for the payment of institutional charges if he or she withdraws if the institution’s tuition refund policies do not provide for a full refund of the student’s tuition; and
- Restrictions on the transferability of the credits that secondary students may receive under the institution’s dual enrollment arrangement, if the institution has information about such restrictions.

DE-Q14. Institutions are required to report information to the Integrated Postsecondary Education Data System (IPEDS) for certain first-time degree or certificate-seeking students. Are there unique IPEDS reporting requirements for students who are enrolled in both secondary school and in a Title IV-eligible postsecondary program under the Dual Enrollment experiment?

DE-A14. Under regular IPEDS reporting instructions, dually enrolled high school students are not considered to be degree/certificate-seeking students. Therefore, institutions that are participating in the Dual Enrollment experiment should exclude all dually enrolled students, including Pell Grant recipients, from IPEDS reporting, specifically from cohort and enrollment counts. This is the case even though, under the experiment, the students must be enrolled as regular students who are seeking a degree or other credential offered by the institutions.