

## Frequently Asked Questions Related to COVID-19

Published March 20, 2020

**The guidance in the Electronic Announcement published March 5, 2020 indicates that the guidance and relief do not apply for students who have not yet enrolled, or whose term has not yet begun, as of that date. We plan to switch from an on campus to an online format for a term that begins in May. Does this guidance apply to us?**

The original guidance did limit the flexibility to students who were already enrolled in a term when COVID-19 related interruptions occurred. Given recent advice from the CDC about social distancing, we have determined that it would be prudent to extend this flexibility to students who enroll in payment periods that begin on or before June 1, 2020. We will continue to monitor the situation and will extend the timeframe for the guidance if appropriate.

**Our institution is not closed, but we have suspended classes on campus and moved them to a distance education format. May we pay Federal Work Study (FWS) wages to students who are unable to work because they have been impacted by COVID-19?**

Yes. The FWS guidance in the Electronic Announcement dated March 5, 2020, applies when the student is unable to work because the school made the decision to close or to move to online/distance education classes and the institution meets the conditions described in Q&A #3 below.

If an FWS student is unable to work his/her scheduled hours because of COVID-19 disruptions (school closures, employer closures, student quarantined, etc.), the school may pay the student for any scheduled hours or allow the student to work by another means (on-line, remote, telecommute, etc.). Students should be paid the wage rate that they would have been paid if they were able to work the scheduled hours.

In this circumstance, when a school pays the student for the hours the student was scheduled to work, but did not work, the school is not required to submit any documentation to the Department. However, the school must document the number of scheduled hours a student should be paid prior to paying the student. Schools should also document in the student's file any actions that were taken regarding payment of FWS funds for scheduled hours that were not worked by the student.

**The guidance in the March 5, 2020 Electronic Announcement indicates that we can pay FWS funds to students who were unable to work as a result of the COVID-19 outbreak if we continuing to pay our other employees, including faculty and staff. We have student workers who do not receive FWS that will not work as a result of the outbreak. We also have certain other employees who will not be paid even though our faculty continue to teach classes. Does this mean that we cannot pay our FWS students who cannot work because of the COVID-19 outbreak?**

No. As long as the institution continues to pay its essential faculty and/or staff and continues to meet its institutional wage share requirement for the FWS program, it may pay students FWS funds for hours the students were scheduled to work, but could not work as a result of the COVID-19 outbreak. The institution is not required to continue to pay all employees who had been working prior to the outbreak if it has discontinued certain operations as a result of COVID-19.

Institutions that have received a waiver of the institutional wage share requirements under 34 CFR 675.26(d) continue to be exempt from the wage share requirements for purposes of the guidance in the March 5 Electronic Announcement.

**Some of our students were studying abroad at foreign institutions through a consortium agreement. The foreign institution suspended its on-campus classes and is transitioning to a distance education format. Some students wish to continue coursework offered by the home school, and others want to stay enrolled in the foreign institution's online coursework. Can these students continue to receive Title IV aid?**

Yes – students who are attending a foreign school as part of a study abroad program are permitted to take online classes from the host foreign school or their home U.S. institution. There is no prohibition on utilizing distance education to teach a U.S. student who is enrolled at a U.S. institution, but is participating in a study abroad program at a foreign school where the foreign school is either part of a consortium or has a written agreement with the student's U.S. institution. In such a case, either the home or host school may offer courses via distance learning.

The statutory prohibition on the use of distance education applies only to eligible foreign schools that enroll U.S. students who intend to earn a degree or certificate from that foreign school and are receiving Title IV, HEA assistance.

**We are planning to close our dormitories as a result of the COVID-19 outbreak. If an institution provides a refund for a portion of the costs for a student's room and board as a result of the outbreak, does the institution need to adjust student budgets? Do we also need to consider the difference in costs for students who must relocate to off-campus housing? What if we provide a partial refund of tuition and fees?**

No. If, as a result of the COVID-19 outbreak, you provide a refund or waiver of expenses for all or part of a student's tuition, fees, room and board charges, or other institutional charges, or if you become aware that a student has moved off campus for the remainder of the term, the Department will not require a re-evaluation of the student's cost of attendance. Therefore, you are not required to make changes to a student's Title IV awards on the basis of such changes.

**In response to the COVID-19 outbreak, our institution has extended our spring break by a full week. What is the impact on Return of Title IV (R2T4) calculations for students who withdraw? Are we required to revise calculations that were performed for students who withdrew prior to the change?**

For R2T4 purposes, institutions should treat days that classes were suspended as days included in a "scheduled break." If you extend your scheduled break and the additional days added to the days in the original scheduled break equal five days or more, you will need to exclude the additional days from R2T4 calculations performed after the change has been made. Similarly, if an institution suspends classes for at least five consecutive days, those days must also be excluded from the R2T4 calculation for students who withdraw after the change has been made.

When determining the number of days in the payment period or period of enrollment, an institution should always use the number of days the student was scheduled to attend at the time of the withdrawal. If a change is made to the length of the payment period – either to exclude days added to a scheduled break or to extend the length of the payment period – the institution should use the number

of days in the revised payment period when determining the number of days in the period for R2T4 purposes for students who withdraw after the change has occurred.

You would not need to perform revised R2T4 calculations for any students who withdrew before the change to your schedule.

**We have extended our spring term by several weeks in response to the COVID-19 outbreak. Most of our students have loan periods that end at the end of our spring term. Does this mean that we need to extend our loan period in the Common Origination and Disbursement system?**

No. Institutions that choose to extend terms that begin on or before June 1, 2020 as a result of the COVID-19 outbreak are not required to change loan period end dates if the loan period was scheduled to end on the term end date.

**We have a clock hour program where students were attending clinicals, but their hospital has decided to cease all externships in response to the COVID-19 outbreak. Are we required to withdraw these students until we can find a new clinical location for them?**

Normally, institutions are not permitted to put students on a leave of absence while coursework, including clinicals or internships/externships, is suspended. However, if a student's coursework is cancelled as a result of COVID-19 and the student is enrolled in a clock hour program, in this limited circumstance the Department will permit the institution to put the student on an approved leave of absence until the institution can resume coursework or can find another placement for the student. This will prevent the institution from considering the student to be withdrawn and performing an R2T4 calculation that will need to be reversed.

Note that this guidance only applies if there is a reasonable expectation that the institution will be able to resume coursework and/or find a placement for the student. If the institution cannot resume coursework or find a placement for a student in this circumstance within 180 days, or if the number of days in all of the student's approved leaves of absence in a calendar period has exceeded 180 days, the student must be considered withdrawn and an R2T4 calculation performed.

**We have a clock hour program that we are considering moving to an online format in response to the COVID-19 outbreak. Is there any guidance you can provide us?**

An institution that offers a clock hour program in a distance education format must ensure that each clock hour of instruction is supervised by qualified institutional personnel. In most cases, synchronous instruction through distance education, where students are actively engaged with an instructor in real-time discussion, would provide an adequate platform for the instructor to supervise students in clock hour programs.

However, an institution that offers asynchronous instruction in a clock-hour program must maintain an online learning platform or another system for monitoring each student's academic engagement to ensure that students are academically engaged in at least 50 minutes for each hour that is recorded as a clock hour attended by the student. In this circumstance, an instructor can complete a student's timesheet to include clock hours earned in a distance education format, but the hours must be based on data or the instructor's own knowledge that the student was academically engaged for at least 50 minutes out of each clock hour that is recorded.

Institutions must ensure that any clock hour offered through distance education meets all applicable requirements set by accrediting agencies and States and fulfills applicable educational prerequisites for State licensure.

**The March 5, 2020 Electronic Announcement indicates that, in response to COVID-19, we can offer courses to students on a schedule that would otherwise be considered a non-standard term while continuing to offer Title IV aid using a standard term academic calendar. Can those courses also overlap courses in our summer term without causing our programs to be treated as nonterm programs?**

Yes, the Department is extending the flexibility described in the electronic announcement to schedules that would otherwise be nonterm as well; for example, an extended spring term that will overlap with a summer term. If an institution extends the length of a term to respond to COVID-19, causing the term to overlap a subsequent term, in this limited circumstance the institution may continue to consider its terms to be standard terms, allowing both the use of a scheduled academic year (SAY) for Direct Loan funds and Pell Grant Formula 1.