



**Questions from NELA Learning Services'  
Notice of Proposed Rulemaking Webcast**  
*Amended to include additional information (new information in red)*

*Aug. 2, 2010*

## Questions from NELA Learning Services' Notice of Proposed Rulemaking Webcast

The following questions were asked during and after the NELA<sup>®</sup> Learning Services "Notice of Proposed Rulemaking Overview" webcast. Answers are provided by NELA policy experts.

### ABILITY TO BENEFIT

**Q1: Are the six hours for ATB required to be "college level" or 100 level courses, or can they be basic or skills advancement courses?**

*A1: The six semester, trimester or quarter hours (or 225 clock hours) must be acceptable toward a degree or certificate offered by the school. The school will use its current standards and policies regarding the coursework that is considered to be acceptable toward a degree or certificate. According to U.S. Department of Education official Jeff Baker during a July 28 webcast, for the purposes of this provision, the six hours may not include remedial coursework. The completed hours must count toward a degree or certificate that is offered by the school.*

**Q2: Is there a definition of "completion" of the six hours?**

*A2: We are unable to locate a federal definition of "satisfactory completion" but the school's own standards of satisfactory academic progress already should prescribe what the school considers "completion" of specific coursework.*

**Q3: Is it considered "satisfactory" to get a D?**

*A3: If the school's standards of satisfactory academic progress indicate that a student's final grade for a class is considered "acceptable" for credit for that class, we believe that the school would be required to consider the grade as successful completion of the course. Each school already has standards of satisfactory academic progress that it is required to apply consistently.*

**Q4: I thought using the completion of six credit hours to demonstrate ability to benefit was new for the Higher Education Opportunity Act and effective now?**

*A4: Correct. The HEOA added the six credit hour or equivalent provision to the ability to benefit criteria. Schools were required to make a good faith effort to comply with the HEOA provisions on the date they were enacted. However, because the statute does not distinguish between semester, trimester, and quarter hours, or provide an equivalent in the number of clock hours, the NPRM proposes the following regulatory language:*

*§668.32(e)(5) "Has been determined by the institution to have the ability to benefit from the education or training offered by the institution based on the satisfactory completion of six semester, six trimester hours, six quarter hours or 225 clock hours that are applicable toward a degree or certificate offered by the institution."*

## **DISBURSEMENT OF TITLE IV AID (BOOKS AND SUPPLIES)**

**Q5: I'm a little confused about providing access to books and supplies by the seventh day. In this situation, students will have a Title IV credit balance. If we cannot determine this until after our add/drop period and enrollment has been verified (which usually is one to two weeks after the term begins), how are we supposed to handle this? And how do these regulations apply to schools that do not have a bookstore on campus or schools that do not confirm enrollment until a few weeks into a term (and therefore may not know if the student will have a credit balance)?**

*A5: The regulation requires the school to provide a method (for example, cash, check, stored value card, book store voucher) for a Pell Grant-eligible student to obtain his required books and supplies no later than the seventh day of the payment period if both of the following are met:*

- *The school could disburse the student's Title IV aid at least 10 days before classes begin for the payment period; and*
- *The disbursement of those funds would create a credit balance on the student's account.*

*Nothing in the proposed regulations distinguishes between schools that have on-campus books stores and those that do not. We do not believe that within the intent of the provision, the vendor for the required books and supplies is relevant.*

*During negotiations, non-federal negotiators stated that the school's confirmation of final enrollment may occur after the proposed seventh day of the payment period. Those negotiators raised concerns regarding institutional liability when funds are released to a student prior to confirmation of enrollment. The Department stated that Pell Grant-eligible students are less likely to have sufficient access to the funds needed to purchase books and supplies within a few days of the class start date, and that it believes the intent of the law is to ensure that students have the tools necessary to succeed in their studies and are not unduly harmed by not having access to any credit balance needed to purchase books and supplies. (Preamble p. 34847)*

**Q6: A student enrolled in summer classes but grades were not posted until the 11<sup>th</sup> day of the new fall term. How can we disburse by the seventh day of the fall term if we don't know if the student is making SAP until the 11<sup>th</sup> day of the period?**

*A6: The language in the NPRM does not clearly indicate whether the Department proposes to permit schools to "hold" funds until it determines if the student meets the school's SAP standards if the student otherwise IS eligible on or before the 10<sup>th</sup> day prior to the payment period. The Department may provide additional clarification on this issue in the Final Rule.*

**Q7: Does it fulfill requirements if the school provides a method for students to obtain books and supplies at the school's bookstore or does the school have to provide funds for students to "shop around" for books and supplies?**

*A7: The school only is required to provide a way for the student to obtain the needed books and supplies, therefore, the school either could advance funds (cash, check, stored value card) or provide a voucher for books and supplies to a Pell Grant-eligible student early in the payment period, but only if the institution had determined that the student met the required criteria (funds could be disbursed and that disbursement would result in a credit balance). We believe that, as currently written, this language provides sufficient flexibility for the school to establish its own policies and processes to ensure that its students have such means.*

**Q8: Will schools be required to make funds available on the seventh day even if students have not completed all institutional application requirements or are the requirements the same if students completed a FAFSA only a couple days prior to the term, and there are several hundred who applied earlier?**

*A8: The proposed language indicates that prior to advancing credit balance funds under the new provisions, the student would have to be determined to be eligible. If the student has failed to complete the necessary documents to establish eligibility, the school has no obligation to ensure access to books and supplies.*

*Note that the second key criterion for the student to have for “early access” to funds is that the school must be able to disburse the student’s Title IV aid at least 10 days before classes begin for the payment period. If the student completed the FAFSA only two days prior to the start of the payment period, the student would have failed to meet that 10-day criterion.*

## **FULL-TIME STUDENT DEFINITION/RETAKING COURSEWORK**

**Q9: With the underfunding of Pell Grant, I don't understand the logic of allowing students to include credit hours for which students have already passed. What is the congress trying to address with this regulation?**

*A9: Prior guidance did not permit the school to pay a student enrolled in a term-based program for repeating a course, or to count the repeated course toward a student’s enrollment status, unless the student would earn credit for that course. Non-federal negotiators noted that schools generally are unable to track this type of information for students without performing individual program audits. Therefore, the definition was amended to alleviate some administrative burden and permit schools to count repeated coursework in this instance for both enrollment status and payment purposes. (Preamble p. 34814)*

**Q10: How many times would a student be allowed to retake a class and count it toward enrollment status?**

*A10: The Department does not regulate the number of times a student may retake a course in these proposed provisions, but instead requires the school to define the effect of retakes as part of its satisfactory academic progress policy.*

**Q11: Would repeated coursework count toward less-than-full-time enrollment status?**

*A11: The definition of a full-time student was amended to provide that a student enrolled in a term-based program may be paid for repeating coursework by counting that coursework in the student’s enrollment status. The change in definition means that term-based programs may count repeat hours in determining eligibility for federal student aid, which is in contrast to current policy that requires the student to earn credit for those hours. It then would follow that the changed definition of full-time status would impact the federal definition of **three-quarter time and half-time status** because it derives from the full-time definition (34 CFR 668.2: an enrolled student who is carrying a **three-quarter time or half-time** academic workload, as determined by the institution, that amounts to at least **three quarters or half** of the workload of the applicable minimum requirement outlined in the definition of a full-time student). **This was confirmed by the Department during its July 28 webcast.***

## **GAINFUL EMPLOYMENT**

### **Q12: Are Title IV loans borrowed at a prior college included in the calculation of median loan debt?**

*A12: Proposed regulations would require the school to report annually to the Department certain information for each of its students who completes a certificate or credentialed non-degree program that leads to gainful employment in a recognized occupation, including the amount of private and institutional loans the student obtained. The Department subsequently will provide the school with summary information regarding students' loan debt from private, institutional and federal loan programs. Some of this summary information would be posted on the school's website, including the median loan debt for such students who completed specific programs during the prior three years.*

*Preamble p. 34809 states: "With regard to disclosing Federal and non-Federal loan debt, based on the information an institution would submit under proposed §668.6(a), the Department would be able to provide the institution with the median Title IV, HEA loan debt, by program, and the median debt from private loans and institutional financing plans by program. The institution would then disclose these amounts."*

*The language does not clearly indicate whether the Department proposes to include only Title IV loan debt incurred by the student at the school where the student completed the program, or if all of the student's Title IV loan debt would be included.*

### **Q13: Regarding disclosure of median loan debt, it would seem that the Department's intent is for a school to disclose the amount of loans that a student could expect to borrow for that program at that school. I would hope ED would clarify that.**

*A13: The median loan debt the school would be required to publish on its website would represent the loan debt of students who have completed their programs during the prior three years. The disclosure of this information is intended to assist prospective students in making informed decisions based on the experience of prior students. The amount of debt, and thus, some understanding of the level of expense incurred, may assist in these decisions. Preamble p. 34808-34809 provide some additional discussion on this issue.*

### **Q14: The gainful employment information applies only to certificate programs, correct?**

*A14: The term "gainful employment" refers to gainful employment in a recognized occupation as defined by a Standard Occupational Classification code published by the OMB or one that is an O\*NET-SOC code established by the Department of Labor. The affected programs, as currently proposed, are those leading to a certificate or recognized educational credential other than a degree. Preamble p. 34808-34809 contain a lengthy discussion of this issue, including current requirements, proposed requirements and the Department's reasons for the changes.*

### **Q15: What does "on-time" graduation mean (for example, extended time for incomplete grades)?**

*A15: We find no definition of the term on-time graduation in the regulations or the Act. Therefore, unless the Department subsequently defines the term, the school would be required to determine what constitutes on-time graduation for its students. We would note, however, that the federal maximum timeframe for the length of time to complete a course of study under satisfactory academic progress is 150% of the program's published length.*

## HIGH SCHOOL DIPLOMAS

**Q16: Will the Department maintain high school information for private and public high schools? What about foreign high school diplomas or credentials? What if the high school is not on the Department's list?**

*A16: The Department has indicated only that it would maintain a list of secondary schools to which it would match the information provided by the student on the FAFSA, but that it plans to issue additional guidance if and when these provisions are enacted.*

*Preamble p. 34823 states: "If, in response to these questions on the FAFSA, a student lists a secondary school or entity that does not match the list of secondary schools maintained by the Department, or if the student does not provide the name of the secondary school or entity or the State that issued the diploma, the Department may select the student's FAFSA for further review by the institution to determine if the student has a valid high school diploma before the student can receive any title IV, HEA aid."*

*We intend to provide more specific guidance to institutions on developing and following procedures for evaluating the validity of high school diplomas through the Federal Student Aid Handbook or through other means. This guidance will address such issues as the procedures an institution might use to determine the validity of a high school diploma.*

**Q17: What about high schools that no longer are open?**

*A17: See information above. There are no additional details with respect to how this process might be implemented.*

**Q18: If the high school was destroyed by an earthquake in Haiti, what documentation would we need to verify high school graduation?**

*A18: The Notice of Proposed Rulemaking does not provide details regarding the Department's plans to implement this provision, the planned scope of any database or the variety of exceptions that it may choose to implement.*

**Q19: If a student selects a valid high school on the FAFSA, but submits a transcript from another high school, would this cause any issues? Would we be responsible for updating the information on the FAFSA?**

*A19: The school would have conflicting information that it must resolve prior to awarding Title IV funds to the student. If the school determines that the high school information listed on the FAFSA is incorrect, the school may be required to update that information with the CPS. It is not known at this time if the school would be required to submit the change to the CPS or only to maintain the correct information.*

**Q20: With regard to high school reporting on the FAFSA, what would be the requirements for home schools? What about GEDs?**

*A20: The proposed regulation indicates that this review is intended for applicants who indicate they have (or will have) a high school diploma, and not for those students who indicate they have a GED or those who are home-schooled. (Refer to Item 26 on the 2010-2011 FAFSA.) Preamble p. 34823 states: "Under proposed §668.16(p), an institution would be required to develop and follow procedures to evaluate the validity of a student's high school completion."*

## RETURN OF TITLE IV AID – TAKING ATTENDANCE

### **Q21: What is the difference between the R2T4 calculations?**

*A21: The difference is not in the actual calculation, but rather in the determination of the student's last date of attendance. For those schools currently not required to take attendance (regardless of whether or not attendance is taken), the school may in some instances use the midpoint of the payment period as the LDA – even if the school's records indicate the student ceased enrollment prior to that date. The proposed rule will require some schools that have records that document the student's LDA to use those records for purposes of R2T4 functions even if they are not required to take attendance by an outside entity.*

*Preamble p. 34825 further explains: "The statute defines the term the 'day the student withdrew' differently for institutions that are required to take attendance and for those not required to take attendance... For an institution that is not required to take attendance, the 'day the student withdrew' is the date the institution determines that (1) the student began the withdrawal process prescribed by the institution; (2) the student otherwise provided official notification to the institution of the intent to withdraw; or (3) in the case of a student who does not begin the withdrawal process or otherwise notify the institution of the intent to withdraw, the date that is the midpoint of the payment period for which title IV, HEA program funds were disbursed, or a later date documented by the institution."*

### **Q22: What if there is a mixture of attendance? For example, one census date for regular classes, positive attendance for classes less than five days in length or hours by arrangement for labs?**

*A22: If a school is not required to take attendance but has a policy under which it does take attendance for some students or for some period of time, the proposed regulations require the school to use those attendance records to define the student's enrollment status. For example, if the school takes attendance only for certain programs for a census period and a student who is enrolled in one of those programs ceases enrollment prior to the end of the census period, the school must determine the student's last date of attendance based on the actual attendance records. However, if a student enrolled in that same course ceases attendance after the end of the census period (after the school ceased taking attendance in that program), the school would determine the student's last date of attendance as if it were not required to take attendance. See the following proposed regulatory language:*

*§ 668.22 Treatment of title IV funds when a student withdraws.*

*(ii) If, in accordance with paragraph (b)(3)(i) of this section, an institution is required to take attendance or requires that attendance be taken for only some students, the institution must use its attendance records to determine a withdrawal date in accordance with paragraph (b)(1) of this section for those students.*

*(iii)(A) If, in accordance with paragraph (b)(3)(i) of this section, an institution is required to take attendance, or requires that attendance be taken, for a limited period, the institution must use its attendance records to determine a withdrawal date in accordance with paragraph (b)(3)(i) of this section for that limited period.*

*B) A student in attendance at the end of the limited period identified in paragraph (b)(3)(iii)(A) of this section who subsequently stops attending during the payment period will be treated as a student for whom the institution was not required to take attendance.*

(iv) If an institution is required to take attendance or requires that attendance be taken, on only one specified day to meet a census reporting requirement, the institution is not considered to take attendance.

**Q23: As a non-term based institution, will the rules change for taking attendance? In other words, would we be required to take attendance?**

*A23: Nothing in these proposed provisions requires a school to take attendance if that school currently is not required by an outside entity to take attendance or the school does not require its instructors to take attendance. The intent of the policy simply is to require a school that does have valid attendance records to apply that information in the return of funds calculation.*

**Q24: Will the changes to attendance-taking regulations make schools who are “required to take attendance” to follow the Dear Colleague Letter that requires a withdrawal date of determination within 14 days?**

*A24: Current guidance from the Department states that a school that is required to take attendance must determine that a student has withdrawn (date of determination) within 14 days of the student’s last date of attendance. If the proposed changes are enacted, a school that is ‘required to take attendance’ under the new provisions would be required to follow this guidance. (Refer to vol. 5, p. 5-47 in the 2009-2010 Federal Student Aid Handbook)*

**Q25: Does the “days in the payment period attended” issue allow for attendance policies/absences?**

*A25: We believe you are referring to proposed §668.22(a)(2)(i) as follows:*

*“In the case of a program that is measured in credit hours, the student does not complete all the days in the payment period or period of enrollment that the student was scheduled to complete...”*

*A discussion of this issue is found in the NPRM Preamble (p. 34824) and makes no mention of absences or attendance policies. Schools may wish to provide comment in response to the NPRM on this issue.*

## **SATISFACTORY ACADEMIC PROGRESS**

**Q26: How would repeated courses be factored into SAP?**

*A26: The school must determine how repeated courses (retakes) factor into its students’ satisfactory academic progress and address this in its SAP policy. The school also must determine the effect of incompletes and transfer credits and address those issues in its SAP policy. Proposed regulations state:*

*§668.34(a)(6) “The policy describes how a student’s GPA and pace of completion are affected by course incompletes, withdrawals, or repetitions, or transfers of credit from other institutions. Credit hours from another institution that are accepted toward the student’s educational program must count as both attempted and completed hours...”*

**Q27: Are transfer credits counted even if they don't pertain to the student's degree program? Are we talking about transfer credit that applies to the major or all transfer credit (for example, undistributed credit)?**

*A27: Nothing in the proposed rules dictates that a school must or must not accept transfer credits toward a student's academic progress. Those factors are driven by each school's own policies regarding transfer credits, academic progress, grade progression, etc. However, the change will require that a school that does accept transfer credits toward the student's program of study apply those credits as both attempted and completed hours.*

*§668.34(a)(6) "The policy describes how a student's GPA and pace of completion are affected by course incompletes, withdrawals, or repetitions, or transfers of credit from other institutions. Credit hours from another institution that are accepted toward the student's educational program must count as both attempted and completed hours..."*

**Q28: Can a student be put on warning for two payment periods and probation for one payment period?**

*A28: The proposed regulations provide that a student may be placed on financial aid warning and continue to receive aid only for one subsequent payment period. A student in a financial aid warning status may appeal the school's finding that he has failed to make SAP and may have Title IV eligibility reinstated. We find nothing in the proposed provisions to permit the school to deliver Title IV aid to a student for two payment periods. A financial aid warning – within the federally proposed definition — is limited only to schools that evaluate academic progress at the end of each payment period.*

*Those same proposed regulations state that a student on financial aid probation may receive aid only for one subsequent payment period. A student on financial aid probation must, at the end of that probationary period, meet the school's SAP standards or, at a minimum, have complied with any special agreements between the student and school related to the student's academic progress. If the student fails to attain that standard, he is not eligible for additional Title IV assistance. The school may retain that student in some probationary status, but without Title IV eligibility.*

**Q29: The NPRM states that transfer attempted and earned credits must be included in your SAP policy. Do the transfer hours count in both the quantitative and maximum timeframe? Currently, we use transfer hours in the maximum timeframe component but not the quantitative component. This is done because sometimes students will transfer in credits but then perform poorly at our school so we feel they are not making satisfactory progress.**

*A29: The proposed regulations do not appear to treat transfer hours differently for the purpose of calculating the maximum timeframe (as defined in §668.34(b) on p. 34876 of the NPRM).*

**Q30: Can you please define one payment period? Is this a term or an award year?**

*A30: Payment period is defined as follows:*

- For a credit-hour program with standard terms or non-standard terms that are substantially equal in length (no term is more than two weeks longer than any other term), the payment period is the standard or non-standard term.*
- For a credit-hour program offered in standard terms with modules, the payment period is all of the modules the student is scheduled to attend within the term, beginning with the module in which the student first attends.*
- For a credit-hour program with non-standard terms that are not substantially equal in length, the first payment period, for a program of one academic year or less, is the*

period during which the student completes half of the hours and half of the weeks of instructional time. The second payment period is the remainder of the program. For a program of more than one academic year in length, for the first academic year the first payment period is defined as the period during which the student completes half of the hours and half of the weeks of instructional time. The second payment period is the remainder of the year. For any remainder of the program that is more than half but less than one whole academic year, the first payment period is defined as the period during which the student completes half of the hours and half of the weeks of instructional time. The second payment period is the remainder of the program.

- For a clock-hour and non-term program the first payment period is generally the period during which the student completes half of the clock hours and half of weeks of instructional time; the second payment period is the period during which the student completes the hours and weeks of instructional time in either the academic year or the program, as appropriate. (Refer to the Common Manual – Section 6.3 or the 2009-2010 Federal Student Aid Handbook, vol. 3, ch. 1).

**Q31: If our program only has two payment periods, does this mean that the student always will be able to receive Title IV? For example, if we have a 900-hour program with two payment periods, we take the first disbursement 30 days after the student starts and the second at the student's midpoint. Therefore, by the time the student finishes the second payment period, all funds already would have been disbursed. If our program only has two payment periods, does this mean that the students always will be able to receive Title IV aid? In other words, it doesn't seem like they ever would be ineligible because of SAP.**

*A31: The proposed regulations would require that, for a program of one academic year in length or less, the school must evaluate SAP at the end of each payment period – 450 clock hours in your example. If a student fails to meet the school's SAP standards at the end of the payment period, the school could place the student on financial aid warning or probation for the following payment period (the remainder of the program), during which period the student would continue to be eligible for Title IV aid. (Preamble p. 34820-34823 provide additional discussion on this issue.) Your premise, therefore, is correct. A student who attends for only two payment periods might never lose eligibility for Title IV assistance.*

**Q32: Would like to hear your opinion on the probationary plan that could be set up for SAP students. Your thoughts about whether it could be something general like: satisfactorily completed at least six credits for the term, or satisfactorily completed 100% of all credits attempted.**

*A32: Proposed language indicates that, if applicable, the school may create an academic plan explaining the context of Satisfactory Academic Progress probation. Within this plan the school may require the student to fulfill specific terms and conditions, such as taking a reduced course load or enrolling in specific courses. Under proposed new rules, your policy also must ensure that the student maintains the pace necessary to successfully progress through the educational program and complete that program within the maximum timeframe. We believe that any alternative requirements for the period of probation must fit into this overall goal.*

*We would encourage you to read the Preamble discussion and comments found on pages 34821-34823 of the Federal Register and compare this to your institution's existing or planned SAP policies. The discussion and comments contained in the Preamble can help you assess how proposed regulatory language may impact your need to edit or change your institution's current policies and procedures.*

## STATE AUTHORIZATION

### **Q33: What happens if the state approval does not contain the three requirements?**

*A33: The proposed regulations state that, for a school to be considered legally authorized by the state, all three of the following criteria need to be met:*

- 1. The authorization is provided to offer postsecondary programs;*
- 2. The authorization is subject to adverse action by the state; and*
- 3. The state has an institutional complaint review process and enforces state laws with respect to that process.*

*If all three of the regulatory criteria are not included in the state's authority, schools that fall within that state's authority would not be considered to be legally authorized by the state for purposes of Title IV administration. The Higher Education Act requires as a condition of eligibility that institutions of higher education, postsecondary vocational institutions and proprietary institutions be authorized by the state to provide postsecondary education.*

## VERIFICATION

### **Q34: If the verification changes pass as reviewed today, would you anticipate that the Quality Assurance Verification program would be eliminated?**

*A34: We have no indication from the Department at this time that the current QA program would cease if these changes are enacted.*

### **Q35: If a student is single at the time of his application and gets married after the application already is processed — or married and then gets divorced, does the student update his FAFSA to change his dependency status?**

*A35: Yes. As proposed, if at any point during the award year the student's dependency status changes – whether due to marriage or divorce, for example — the student would be required to report the change to the CPS.*

### **Q36: If dependency status changes as a result of marriage after the completion of a semester, would the schools make any additional aid eligibility retroactive?**

*A36: We do not have any information from the Department at this time on how these changes would be implemented in the award, origination and adjustment processes. We anticipate that additional process-related information would be forthcoming once the Final Rule is published (by Nov. 1, 2010), if no changes are made to this proposal.*

### **Q37: Will the change trigger a verification flag?**

*A37: While we are aware that making some corrections and adjustments does appear to trigger the verification flag on the subsequent ISIR, the Department has not indicated whether such a change to the student's dependency status would trigger the verification indicator.*

## WRITTEN AGREEMENTS BETWEEN SCHOOLS (CONSORTIUM AND CONTRACTUAL AGREEMENTS)

**Q38: With regard to common ownership, what happens if both schools are part of a state system?**

*A38: State institutions would not be covered by this provision as proposed. They are not owned or controlled by the same person, partnership or corporation.*

*Note the specific proposed regulatory language (§668.59(a)(2) states:*

*(2) If the written arrangement is between two or more eligible institutions that are **owned or controlled by the same individual, partnership, or corporation** (emphasis provided), the Secretary considers the educational program to be an eligible program if —*

*(i) The educational program offered by the institution that grants the degree or certificate otherwise satisfies the requirements of § 668.8; and*

*(ii) The institution that grants the degree or certificate provides more than 50 percent of the educational program.*

**Q39: What specifically is meant by “common control” relating to consortium agreements?**

*A39: §668.5 describes common control as occurring when an institution or multiple institutions are “owned or controlled by the same individual, partnership or corporation.”*

**Q40: Do you have to have a consortium or can a student take a course or two at another college and simply have the transcript sent from that school?**

*A40: We find no statutory or regulatory provision that requires a school to enter into either a consortium agreement (with one or more eligible schools) or a contractual agreement (with one or more ineligible schools) in order to accept a student’s credits or grades from another institution. However, schools should consult with their state and accrediting agencies, and may wish to consult with their legal counsel, to ensure that all requirements are met.*

## CREDIT HOUR DEFINITION

**Q41: Was there any discussion about using clock-to-credit-hour conversion employed by the accreditation agencies? For example, one quarter credit hour consists of 10 hours of lecture, 20 hours of lab and 30 hours of externship. Why recreate the standard?**

*A41: The Preamble discussion makes no mention of accreditation agency standards. We believe the Department wishes to standardize the conversion for all schools and all programs for which the conversion is required.*

This information is intended to provide current information and is not intended to be legal advice. Information has not been reviewed or approved by the U.S. Department of Education. NELA disclaims all responsibility for any claim arising from reliance on the information provided.

© Copyright 2010 NELA. All rights reserved.