

Federal Student Aid’s response to comment received during the 60 day public comment period for ICR 1845-0099 – Student Assistance General Provisions – Financial Assistance for Students with Intellectual Disabilities.

On March 7, 2022, a notice was published in the Federal Register, Vol. 87, No. 44, page 12679, inviting public comment on the burden estimates for the regulations under Student Assistance General Provisions – Financial Assistance for Students with Intellectual Disabilities. The comment period expired May 6, 2022 and 4 comments were received. The table below shows the comments and FSA’s response to those comments.

	Commenter	Comment	FSA Response
1	gavinruckart01@gmail.com	Comment not related to the information collection	No response.
2	Meg Grigal & Debra Hart Think College National Coordinating Center Institute for Community Inclusion, UMass Boston	<p>Comprehensive Transition Program (CTP)</p> <p>Issue: Time for development of CTP program application The documents posted for review by the Department of Education estimate it will take an institution of higher education .33 hours to prepare a CTP application. The estimation of 20 minutes to complete the CTP application is unrealistic and should be revised. Suggestion: An estimation of 3-5 hours would be more accurate by reflecting the necessary administrative approvals and writing time involved to complete the supporting documentation for the CTP application.</p> <p>Issue: Approval process applicants find a few aspects of the approval process confusing. For example, there is no information on the estimated time it will take for applications to be approved. There is no official checklist of what is required as part of the application. Additionally, programs have</p>	<p>The initial .33 hours was originally calculated for the recordkeeping/retention process for the application. Upon review of the regulatory language, we agree that it is a broader requirement for the completion of the application and not just recordkeeping.</p> <p>FSA has increased the time to 4 hours for each application in keeping with the suggestion.</p> <p>See corrected burden in the updated supporting statement.</p> <p>These suggestions are outside the focus of this information collection and regulatory language. FSA appreciates these suggestions, and they will be forwarded to the appropriate office for consideration.</p>

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		<p>reported that they were not notified directly when their applications were approved. Suggestion: 1) Programs should be notified directly upon application approval. We understand that the financial aid office is typically informed, but a small change, simply copying program staff on the notification email, would help avoid delays and confusion. 2) Estimates of approval time should be provided to applicants. These estimates should be reviewed and updated regularly to confirm accuracy. 3) The FSA at DOE should create and offer an official checklist of all application requirements. Issue: Reviewer training to adhere to intent of the law The Higher Education Act clearly states that students enrolled in CTP programs must participate at least half of their time in the program in academic components including coursework with students without disabilities or in internships or work-based training in settings with individuals without disabilities. CTP programs should not be approved that show less than 50% inclusion in academic courses or internships/work settings. Additionally, the law specifies that CTPs must</p>	<p>These suggestions are outside the focus of this information collection and regulatory language. FSA appreciates these suggestions, and they will be forwarded to the appropriate office for consideration.</p>
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	<p>enroll students with intellectual disability and only students with intellectual disability may access federal student aid under the CTP provisions. Some approved CTP programs enroll students who do not have intellectual disability.</p> <p>Suggestion: Reviewer training is needed to enable reviewers to understand the law and only approve programs that meet the requirements in the Higher Education Act.</p> <p>Issue: Confusion at financial aid offices on administering financial aid to students at CTP programs.</p> <p>The staff in financial aid offices are the point persons for interpreting the CTP requirements at their institution of higher education. The NCC has been informed of some common misunderstandings that arise in financial aid office interpretation of the CTP requirements. There is a critical need for clear guidance on the flexibility that is awarded to CTP programs in determining if that program is full or part time.</p> <p>Suggestion: 1. It would be helpful if the DOE would develop a frequently asked questions (FAQ) page for applicants.</p>	<p>These suggestions are outside the focus of this information collection and regulatory language. FSA appreciates these suggestions, and they will be forwarded to the appropriate office for consideration.</p>
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		The NCC would be happy to offer a suggested list of questions and assist in development of content	
3	Stephanie Smith Lee Senior Policy Advisor National Down Syndrome Congress (NDSC)	We strongly agree with Think College National Coordinating Center (NCC) comments that “The Higher Education Act clearly states that students enrolled in Comprehensive Transition Programs (CTPs) must participate at least half of their time in the program in academic components including coursework with students without disabilities or in internships or work-based training in settings with individuals without disabilities. CTP programs should not be approved that show less than 50% inclusion in academic courses or internships/work settings. Additionally, the law specifies that CTPs must enroll students with intellectual disability and only students with intellectual disability may access federal student aid under the CTP provisions. Some approved CTP programs enroll students who do not have intellectual disability.” Recommendation: NDSC recommends that CTP reviewers be selected and trained to understand the HEA ID requirements and only approve programs that meet these and the other CTP requirements in the law.	This suggestion is outside the focus of this information collection and regulatory language. FSA appreciates this suggestion, and it will be forwarded to the appropriate office for consideration.
4	John Tschida, Executive Director	We strongly support <u>all</u> of the recommendations made by	This suggestion is outside the focus of this information

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	<p>Denise Rozell, Director of Policy Innovation</p> <p>Association of University Centers on Disabilities (AUCD)</p>	<p>Think College National Coordinating Center(NCC) at the Institute for Community Inclusion, UMass Boston in their comments and wish to align AUCD and its members with those comments.</p> <p>AUCD strongly agrees with the NCC comments that “The Higher Education Act clearly states that students enrolled in CTP programs must participate at least half of their time in the program in academic components including coursework with students without disabilities or in internships or work-based training in settings with individuals without disabilities. CTP programs should not be approved that show less than 50% inclusion in academic courses or internships/work settings. Additionally, the law specifies that CTPs must enroll students with intellectual disability and only students with intellectual disability may access federal student aid under the CTP provisions. Some approved CTP programs enroll students who do not have intellectual disability.”</p> <p>Recommendation: AUCD recommends that CTP reviewers be selected and trained to understand the HEOA requirements and only approve programs that meet the CTP requirements in the law.</p>	<p>collection and regulatory language. FSA appreciates this suggestion, and it will be forwarded to the appropriate office for consideration.</p>
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