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

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.	These suggestions are outside
Issue: Reviewer training to	the focus of this information
adhere to intent of the law	collection and regulatory
The Higher Education Act	language. FSA appreciates
clearly states that students	these suggestions, and they
-	will be forwarded to the
enrolled in CTP programs	
must participate	appropriate office for consideration.
at least half of their time in	consideration.
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.	
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.	These suggestions are outside
Issue: Confusion at financial	the focus of this information
aid offices on administering	collection and regulatory
financial aid to students at	language. FSA appreciates
CTP	these suggestions, and they
programs.	will be forwarded to the
The staff in financial aid	appropriate office for
offices are the point persons	consideration.
for interpreting the CTP	
requirements at	
their institution of higher	
0	
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.	
Suggestion:	
1. It would be helpful if the	
DOE would develop a	
frequently asked questions	

Image: Section 2015The NCC would be happy to offer a suggested list of questions and assist in development of contentThis 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.3Stephanie 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," Recommendation: NDSC 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 information4John Tschida, Executive DirectorWe strongly support all of the recommendations made by the law.This suggestion is outside the focus of this information				
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	Denise Rozell, Director of	Think College National	collection and regulatory
	Policy Innovation	Coordinating Center(NCC) at	language. FSA appreciates
		the Institute for Community	this suggestion, and it will be
	Association of University	Inclusion, UMass Boston in	forwarded to the appropriate
	Centers on Disabilities	their comments and wish to	office for consideration.
	(AUCD)	align AUCD and its members	
		with those comments.	
		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 orwork-	
		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."	
		disability.	
		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.	
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