

The questions and answers in this handout are based on information provided during the webinar held by the Think College National Coordinating Center on January 21st, 2020. To access the recording of the webinar:
<https://thinkcollege.net/resource/federal-student-aid-comprehensive-transition-program-ctp-application-process/an-overview-of>

Are CTP programs subject to the Gainful Employment regulations?

No. CTP programs are considered an exception to the current Gainful Employment (GE) regulations. While CTP programs are defined this way in the Higher Education Opportunity Act: designed to support students with intellectual disability seeking to continue academic, career and technical, and independent living at an institute of higher education in order to prepare for gainful employment; in this instance the term "gainful employment" refers generally to employment and participation in the workforce, and thus CTP programs are not required to meet gainful employment regulations.

For further information, see GE Electronic Announcement #53 (5/20/2015)
<https://ifap.ed.gov/electronic-announcements/05-20-2015-gainful-employment-subject-gainful-employment-electronic>

What are the academic components of a CTP program?

The HEOA lists these four activities as meeting the academic components of a CTP program:

- (i) Taking credit-bearing courses with students without disabilities
- (ii) Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit
- (iii) Taking non-credit-bearing, nondegree courses with students without disabilities
- (iv) Participating in internships or work-based training in settings with individuals without disabilities.

Students attending a CTP program must spend at least half of their time in one or more of these academic activities.

As college courses may be taken for credit or for audit and including non-credit classes and internships, a CTP program can individualize a course of study based on individual students. In some cases, students may wish to take a credit-bearing course for credit. In other instances, a student may benefit more from auditing a class. One student would benefit from attending a class and participating in a discussion but would be better served by not participating in a final research project, while for another student that same final paper or project is a meaningful learning experience. It's perfectly fine, and encouraged, to tailor participation level to an individual student's interests and abilities, and integrate that in each student's plan as part of your advising process. The program has the flexibility to allow students to learn and participate at a level that works for them and to still consider that as part of their program participation.

Non-credit bearing or non-degree courses taken with students without disabilities, often offered through Continuing Education, may also be counted toward the academic component of the program. If the courses are included as program requirements, those also count as contact hours. School offerings for non-credit bearing or non-degree courses will vary from school to school, but a common example might be a leisure and recreation offering. Those can provide an integrated experience and can fit within the spirit of what CTP programs aim to offer. Students would be learning alongside their peers without disabilities in a setting that's a bit more relaxed than a lecture style class and may afford more opportunities for student interaction.

Internships and work-based training also provide a valuable opportunity for students to experience integrated learning that will be directly applicable to future employment.

What can be counted as a contact hour for a student enrolled in a CTP program?

What may be counted as a contact hour in a comprehensive transition program is significantly broader than what may count as a contact hour in degree programs. Activities such as individualized instruction to support independent living, meetings with a career adviser, participating in college clubs, or attending campus events with a peer mentor are all things that could count towards the CTP program clock hours. If these activities fulfill requirements of the CTP program credential, they can be counted as clock hours in the program. Note that all activities included in clock hours towards the course of study must have a grading/evaluation process in order to factor these activities in when determining satisfactory academic progress. Your school participation division can help you more with any detailed clock or credit hour questions you have for program planning.

How should we calculate the program length in clock hours?

In the CTP program application, the school will describe the credit hours and program length per §668.232:

1. Identify the number of weeks of instructional time; and
2. the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities. Remember to include all scheduled activity that is a required part of the CTP program, including audited classes, mentorship, scheduled lunches with students without disabilities, etc.

In the E-application (Question 27i), the school will report the clock hours for the program, unless the only requirements of the program are courses that can be used towards a degree at that institution. The school can use one of the conversion formulas in Chapter 2 of the FSA Handbook:

- a semester hour must include at least 37.5 clock hours of instruction,
- a trimester hour must include at least 37.5 clock hours of instruction, and
- a quarter hour must include at least 25 clock hours of instruction.

A clock hour is defined as a period of time consisting of

1. a 50- to 60-minute class, lecture, or recitation in a 60-minute period;
2. a 50- to 60-minute faculty-supervised laboratory, shop training, or internship in a 60-minute period; or
3. sixty minutes of preparation in a correspondence course.

A credit hour is an amount of work that reasonably approximates not less than

1. one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class work each week for approximately 15 weeks for one semester or trimester hour of credit, or 10 to 12 weeks for one quarter hour of credit, or at least the equivalent amount of work over a different amount of time; or
2. at least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

For purposes of determining contact time, please remember that for CTP programs a broader range of activity may be counted as academic time than could be counted with a non-CTP program. Audited courses count as class time. For students in a CTP program, time spent in life skills instruction, in mentoring sessions required by the program, and even scheduled social time with students without disabilities could all be considered analogous to non-classroom work such as laboratory work and studio time.

What is the minimum number of clock hours for a CTP program to be considered full time?

There is no regulatory designation of an eligible program as full-time. CTP programs are designed to be flexible. Schools should state in the CTP program application whether they consider the program to be part or full time.

How should Satisfactory Academic Progress be determined for students enrolled in a CTP program?

CTP programs are required to have a defined standard for satisfactory academic progress, but because students are likely to be auditing courses and are likely to have various noncredit experiences that can still count as part of

their program, you're going to be making that determination in a different way than you would for a standard program at your school. Any required program component that counts towards the contact hours for the program must have a corresponding evaluation of student progress.

Do you have any tips for completing a CTP program application?

Use the regulations as a checklist to make sure that you've included all the details that you need in your application. When you've carefully designed a program to meet all of the requirements and goals for a CTP program, make sure that you're communicating and providing details for how it is that your program is meeting those requirements. You want to make sure to show how your program is designed to socially and academically integrate students with your general student population to the maximum extent possible. With CTP programs, programming both inside and outside of the classroom is important to the student's experience. Be sure that you don't limit descriptions of your program strictly to what is occurring in the formal classroom setting. Expand your descriptions to include a broader view of the programming you provide to students attending the program. As you go through some of these requirements, you may feel a bit frustrated that some of them are not very prescriptive. You might want more reassurance that you're on the right track. Please keep in mind these are broad to give you freedom to find what works within your institutional structures and what works well for the students you serve.

Do schools have to hear back from their accrediting agency before submitting an application to add a CTP?

No. Schools do not have to have a reply from the accrediting agency. The requirement is that you send with your CTP program application the letter or notification you sent to your accreditor.

If a college or university that wants to seek CTP program approval offers different program lengths (e.g., a 2-year program with an optional 3rd year), how should they structure the CTP program application?

Treat those as separate programs and write separate CTP program applications for each program. You would enroll the student in the program that fits the course of study they are pursuing, but you can always transfer them from one program to another, should they choose to pursue a program of different length than they had originally planned on. For example, a student who began in the two-year program could transfer to the three-year program or the other way around, but separate programs would be established, and students would enroll in one program or the other.

Once a CTP program is approved, does the school need to go through periodic re-approval?

At the present time, approved CTP programs do not have an end date and schools do not need to seek re-approval.

If a program undergoes revisions, when should they consider re-applying for CTP program approval?

The general guideline that schools should look at is whether their state or accreditor would consider the change to be a substantive change. If the program is changing credential levels such as going from a certificate to an associate degree, that would probably be significant. If the program is changing from having two supervised study periods a week to three supervised study periods a week for students, probably not. Contact the state or accrediting agency to seek advice on whether the program revisions are a substantive change.

How does the new CTP-specific CIP code affect current CTP programs?

CIP stands for classification of instructional programs. A CIP code is used by the National Center for Education Statistics. Schools enter a CIP code into COD (Common Origination and Disbursement website) when administering financial aid. The new CIP code is 30.0001. It's important to wait until the financial aid systems update with the new 2020 CIP codes. Otherwise records used before that time will bounce in the system. Schools will not need to do anything in their E-app for the time being for their existing programs. Once the CIP code goes live, you can start using the new CIP code in COD before you have updated your E-app. The next time your school updates their E-app they should update the CIP code associated with the CTP program to match what you're using in COD.

Finally, the new CIP code is an option for schools to use. It's not mandatory. Your school's academic governance structure is still responsible for assigning CIP codes to programs. However, since it was designed specifically for CTP programs, we encourage schools to use it.

What type of oversight is provided once an institution is approved to offer a CTP program?

Approved CTP programs are included in program reviews and audits. School Participation Division teams conduct program reviews, and schools are required to have annual compliance audits for all Title IV programs.

Can students without intellectual disability attend CTP programs?

It's up to each individual school who they wish to admit to their program. However, students do have to meet the criteria for having an intellectual disability to qualify for Title IV aid. The definition of a student with an intellectual disability is a student—

- (1) With a cognitive impairment characterized by significant limitations in—
 - (i) Intellectual and cognitive functioning; and
 - (ii) Adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and
- (2) Who is currently, or was formerly, eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1401), including a student who was determined eligible for special education or related services under the IDEA but was home-schooled or attended private school.

Are ABLE accounts considered assets for the purpose of determining financial need when completing the FAFSA?

ABLE accounts are not included as investment assets for the parent or the student when completing the FAFSA. You can find this information in writing in the explanatory notes to the FAFSA. For the 2020/2021 FAFSA PDF this is on page 9 in the right-hand column: <https://studentaid.gov/sites/default/files/2020-21-fafsa.pdf>

RELATED RESOURCES

There is a Comprehensive Transition Program learning module available on the Think College website. There are sections on requirements of CTPs, Preparing to Apply, CTP Application and Submission, and Other Components for Financial Aid Eligibility. <https://thinkcollege.net/think-college-learn/comprehensive-transition-programs-0>

Cate Weir & Clare Papay presented this webinar, The What, Why and How of Becoming a Comprehensive Transition Program. The recording, webinar handout, and transcript from this webinar are available. <https://thinkcollege.net/resource/comprehensive-transition-program-ctp-application-process/what-why-and-how-becoming>

There is category in the Think College Resource Library called Comprehensive Transition Program (CTP) application process, which includes items authored by Think College staff as well as external resources. https://thinkcollege.net/resource-search?sort=field_resource_publication_date&order=desc&f%5B0%5D=field_resource_topics%3A1454



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