CALIFORNIA COMMUNITY COLLEGES
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                                                                    VIA E-MAIL

TO: Chief Instructional Officers
               Chief Student Services Officers

FROM: Pamela D. Walker
               Vice Chancellor, Educational Services

SUBJECT: Program Approval and Financial Aid

Federal regulations require that each academic program eligible for federal student financial aid be approved by the appointed State Authorizing Agency if the State Authorizing Agency requires an approval. The California Community Colleges Chancellor's Office (CCCCO) is the recognized state authorizing agency for California Community Colleges and requires that programs be approved by the CCCCO except as noted below:

In 2007, a change was made to title 5, section 55070, whereas, the CCCCO issued a memo regarding the Certificate of Achievement Approval Process dated December 11, 2007, which clarified the following:

1. CCCCO approval is required for a Certificate of Achievement consisting of at least 18 semester units (or the equivalent) of degree-applicable coursework in a field of study.

2. CCCCO approval is permissive but not required for low unit Certificates of Achievement of 12 or more semester units but fewer than 18 semester units (or equivalent).

The Federal Student Aid Handbook states:

> A school's Federal Student Aid (FSA) eligibility does not necessarily extend to all its programs, so the school is responsible for ensuring that a program is eligible before awarding FSA funds to students in that program.

> In addition to determining that the program meets the eligible program criteria given in this chapter, the school should make certain that the program is included under the notice of accreditation from a nationally recognized accrediting agency (unless the agency does not require that particular programs be accredited).

> The school should also make certain that it is authorized by the appropriate state to offer the program (if the state licenses individual programs at postsecondary institutions). In some instances, a school or program may need a general authorization as well as licensure for a specific program approval.

The U.S. Department of Education (USDE) has started verifying state program approval during recertification of a college's Program Participation Agreement (PPA) or any changes to eligible programs submitted for approval during the course of the year. Any deviation from what the college submits for federal approval and what the college submitted to the CCCCO and received approval through Curriculum Inventory (CI) can be cause for concern.

It is the responsibility of the college to continuously maintain a reconciled listing of:

- College catalog
- Program titles and awards in the college's local curriculum management system
- USDE Program Participation Agreement (ECAR/PPA)
- Curriculum Inventory

The USDE has already identified that some colleges are offering programs that do not appear at all in CI. In such cases, colleges are required to postpone payment of federal financial aid to students enrolled in those programs, submit the programs to the Chancellor's Office for approval, and then recertify the programs' eligibility to the USDE. For example, there are many discrepancies in CI related to program title, Top Code, and /or unit value that differ from what was submitted to USDE and from the college's catalog. Colleges with programs that do not "exactly" match what is in CI (program title, TOP code and/or unit value) should submit a non-substantial change to correct the issue.

Programs that are inactive but for which students still have catalog rights should still be listed on the documentation sent to USDE. The CCCCO Student Services and Special Programs Division is working with USDE to find a method to identify these programs. More information will be provided once a process has been confirmed with USDE.

Colleges should conduct a careful review of the programs in CI to ensure the program records match those in their local curriculum management system and the college catalog. If discrepancies are found, colleges may reconcile by submitting new or substantial change program proposals for review and approval. Your Financial Aid Administrator, Registrar, and Curriculum Administrator should all be involved with the reconciliation process.

Please contact Rhonda Mohr in Student Services at rmohr@cccco.edu or Jackie Escajeda in Academic Affairs at jescajeda@cccco.edu, should you have any questions.