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RGM Memo

Date: February 5, 2014
To: School Owners and Financial Aid Personnel
RE: Program Integrity Questions and Answers on High School Diploma

The information we copied at the bottom of this memo came from the Electronic Announcement released on 01-30-2014 regarding the updated Program Integrity questions and answers on High School Diploma.

<http://ifap.ed.gov/eannouncements/013014HSQAs012414Miedits.html>

We highly recommend you read this important electronic announcement.

Thank you,
Rafael

HIGHER EDUCATION

Program Integrity Questions and Answers - High School Diploma

- [Program Integrity Q&A](#)

Questions on this topic are divided into the following categories:

- [Recognized Equivalent of a High School Diploma](#)
- [Checking the Validity of a High School Diploma](#)
- [Documenting High School Completion Status](#)
- [Foreign High School Diploma](#)

In addition to the Q&As listed below, please see the following resources for guidance related to High School Diploma:

- [Program Integrity Issues; Proposed Rule \(Page 34823\)](#)
- [Program Integrity Issues; Final Rule \(Pages 66887 – 66892 and 66951\)](#)
- [Dear Colleague Letter GEN-12-01](#)
- [Dear Colleague Letter GEN-12-03](#)
- [Dear Colleague Letter GEN-12-09](#)

Recognized Equivalent of a High School Diploma (RED)

RED-Q1. The regulations at 34 CFR 600.2 include the definition of a "recognized equivalent of a high school diploma." One of those equivalents is "an academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree." Does this mean that any coursework that is at least two years or more is an acceptable equivalent of a high school diploma?

RED-A1. No. To be a “recognized equivalent of a high school diploma,” the two years of coursework must be acceptable for full credit toward a bachelor’s degree. The following are considered the equivalent of completing a “two-year program,” regardless of the time it takes a student to complete the coursework (e.g., on an accelerated schedule):

1. Successful completion of an associate’s degree program;
2. Successful completion of at least 60 semester or trimester credit hours or 72 quarter credit hours that does not result in the awarding of an associate’s degree, but that is acceptable for full credit toward a bachelor’s degree at any institution; or
3. Enrollment in a bachelor’s degree program where at least 60 semester or trimester credit hours or 72 quarter credit hours have been successfully completed, including credit hours transferred into the bachelor’s degree program.

Note: Students who earned at least six credits (or 225 clock hours) in an eligible program at a Title IV eligible institution prior to July 1, 2012, are eligible to use the ability to benefit alternative to a high school diploma as allowed under the grandfathering test described in Dear Colleague Letter GEN-12-09. [Guidance issued 1/24/2014]

RED-Q2. How can an institution verify whether an online GED program is valid?

RED-A2. The regulatory provision that allows a GED certificate to be considered the “equivalent of a high school diploma” requires obtaining the certificate. The requirement is not satisfied by completing a “GED program.” For Title IV purposes, there is no concept of a valid GED program, online or not. The student must take and pass the GED test in person at a designated GED Testing Center. Once the student has completed all sections of the GED test and passed by satisfactorily meeting minimum scores, the State will issue a certificate of high school equivalency.

The student may also be issued an official GED transcript by the test publisher or the jurisdiction where the test was taken which will provide the test scores for each academic content area of the GED test. Institutions often use the GED transcript to make academic placement determinations. The GED transcript meets the definition of a recognized equivalent of a high school diploma if, in addition to the content scores, the official GED transcript indicates that the student passed the GED test. [Guidance issued 1/24/2014]

RED-Q3. Please advise if a certificate of high school completion is sufficient for a student to be eligible for Title IV funding.

RED-A3. No. Generally a certificate of high school completion (as opposed to a high school diploma) is issued to students who have completed high school coursework, but who have not met all the academic high school graduation requirements, including passing any required examinations.

We rely on a State’s determination as to what constitutes a high school diploma including whether a certificate of high school completion is equivalent to a high school diploma in that State. Therefore, institutions should check with the State in which the certificate of high school completion was awarded to see if that State considers the certificate of high school completion to be a high school diploma or its equivalent. [Guidance issued 1/24/2014]

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Checking the Validity of a High School Diploma (CVD)

CVD-Q1. Do high schools have to be accredited for their graduates to be eligible for Title IV aid?

CVD-A1. For Title IV student aid purposes, there is no requirement that a high school be accredited. In determining whether a student’s high school diploma is valid, the Federal Student Aid Handbook suggests that institutions check with the appropriate state agency in the State in which the high school is located to determine if a diploma issued from that school is recognized by that State as a high school diploma. [Guidance issued 1/24/2014]

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Documenting High School Completion Status (DHC)

DHC-Q1. Can an institution provide Title IV aid to a student who completes his or her high school requirements early, but the high school does not formally issue the high school diploma until a later time (e.g., at the end of the school year)?

DHC-A1. Yes, if the institution obtains a signed statement from an official of the high school or school district indicating that the student has completed all of the required coursework and has successfully passed any required proficiency examinations for the high school diploma. The statement must include the date when the actual high school diploma will be issued. [Guidance issued 1/24/2014]

DHC-Q2. Can a student be admitted as a regular student to a postsecondary educational institution who does not have a high school diploma, or its recognized equivalent, or has not completed a secondary school education in a homeschool setting?

DHC-A2. Yes, but in accordance with §600.4(a)(2)(iii), only if the student is beyond the age of compulsory school attendance in the State in which the institution is physically located. However the student would not be eligible to receive Title IV aid unless the student met one of the other recognized equivalents of a high school diploma. [Guidance issued 1/24/2014]

DHC-Q3. Can an institution rely on a student's self-certification on the FAFSA that he or she obtained a high school diploma or must the institution verify the student's high school completion status?

DHC-A3. An institution may rely on a student's self-certification on the FAFSA that he or she obtained a high school diploma. However, if the institution has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education, the institution must follow its procedures, as required under the regulations at 34 CFR 668.16(p), to evaluate the validity of the student's high school completion. [Guidance issued 1/24/2014]

DHC-Q4. When an institution relies on a student's self-certification on the FAFSA that he or she obtained a high school diploma, but later determines that the student did not obtain the diploma, is the institution or the student responsible for returning all Title IV aid disbursed to the student?

DHC-A4. Generally the student is liable and responsible for returning all Title IV funds disbursed to or on behalf of the student. However, if the institution knew or should have known that the student did not have a high school diploma, the institution would be liable and must return all Title IV funds disbursed to the student. This could happen, for example, if contrary to what the student provided on the FAFSA, the institution's admissions office has a high school transcript that does not show that the student both completed high school and was awarded a high school diploma. [Guidance issued 1/24/2014]

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Foreign High School Diploma (FHD)

FHD-Q1. Is a high school diploma from a foreign country recognized as a valid diploma?

FHD-A1. Yes, if the institution determines whether the foreign secondary school credentials are evidence of completing the equivalent of a secondary education in the United States. Institutions that do not have the expertise to make that determination themselves may use a foreign diploma evaluation service. [Guidance issued 1/24/2014]

FHD-Q2. What documentation may an institution accept to verify an applicant's high school completion status when the applicant indicates that it is not possible to obtain documentation of his or her completion of a secondary education in a foreign country?

FHD-A2. Applicants who completed secondary education in a foreign country and who are unable to obtain a copy of their high school diploma or transcript may document their high school completion status by obtaining a copy of a "secondary school leaving certificate" (or other similar document) through the appropriate central government agency (e.g., a Ministry of Education) of the country where the secondary education was completed. [Guidance issued 1/24/2014]

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Program Integrity Q&A