**R. Gonzalez Management Inc. (RGM)**

Student Financial Aid Services Phone No. (323) 730-8700

3560 S. La Cienega Blvd. Suite G Fax No. (323) 730-8701

Los Angeles, CA 90016-4400 Web Page <http://www.rgmsms.com>

**RGM Memo**

Date: May 23, 2016

To: Dear School Owners and Financial Aid Personnel,

RE: Changes to Title IV Eligibility for students without a valid High School Diploma

On May 9, 2016 a Dear Colleague Letter came out with clarifications on changes made by the Consolidated Appropriations Act of 2016 to the definition of an eligible career pathway program and Federal Pell Grant award amounts for students enrolled in those programs.

Please read this section of the implementation from the Dear Colleague Letter GEN-16-09 mentioned above:

Implementation

Eligibility for all Title IV Aid - A student who was enrolled in an eligible career pathway program prior to December 18, 2015, as such a program was previously defined under the Consolidated and Further Continuing Appropriations Act of 2015 (Pub. L. 113-235), continues to be Title IV eligible under the guidance provided in Dear Colleague Letter GEN-15-09 for the remainder of the 2015–2016 award year. For all other students who were first enrolled in an eligible career pathway program on or after December 18, 2015, to be Title IV eligible, the eligible career pathway program must meet the revised definition provided in Pub. L. 114-113, as outlined in this letter. Therefore institutions are advised to make any necessary changes to their eligible career pathway program to make them compliant with the definition in Pub. L. 114-113.

Definition of an Eligible Career Pathway Program

Public Law 114-113 amended the definition of an eligible career pathway program for purposes of Title IV aid eligibility under section 484(d)(2) of the HEA to align with the definition of career pathway in section 3 of the Workforce Innovation and Opportunity Act (WIOA) (29 U.S.C. 3102(7)). Under section 484(d)(2) of the HEA, an eligible career pathway program means a program that combines rigorous and high-quality education, training, and other services that—

1. Aligns with the skill needs of industries in the economy of the State or regional economy involved;
2. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the ‘National Apprenticeship Act’; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);
3. Includes counseling to support an individual in achieving the individual’s education and career goals;
4. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
5. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
6. Enables an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
7. Helps an individual enter or advance within a specific occupation or occupational cluster.

*Eligibility for Pell Grant Awards* - For students who were previously eligible only for Limited Pell Grant awards, institutions must now use the Regular Federal Pell Grant Payment and Disbursement Schedules published in [Dear Colleague Letter GEN-15-02](http://www.ifap.ed.gov/dpcletters/GEN1502.html) for any payment period that is part of the current 2015–2016 award year and, for the upcoming 2016–2017 award year, the Federal Pell Grant Payment and Disbursement Schedules that are published in [Dear Colleague Letter GEN-16-01](http://ifap.ed.gov/dpcletters/GEN1601.html).

Below you will find the link to Dear Colleague Letter GEN-16-09, which has all the details described above. Please make sure you read carefully so that you understand the changes made.

Please copy and paste to your browser:

[GEN-16-09: Changes to Title IV Eligibility for Students Without a Valid High School Diploma Who Are Enrolled in Eligible Career Pathway Programs in PDF Format, 532KB, 8 Pages](http://ifap.ed.gov/dpcletters/attachments/GEN1609.pdf)

Rafael