Doctoral Students' Council (DSC)

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To: Mr. Matthew G. Schoengood, Vice President for Student Affairs
From: The Doctoral Students Council (Rob Faunce, Co-Chair for Communications)

Please read the attached DSC position paper on cost of attendance statistics. As we believe you'll see, there are issues of concern that must be addressed regarding the dissemination of information on cost of living (in context with attending the Graduate Center). We are also attaching a federal guideline for cost of attendance figures. We hope that our research will help light the process of remediating this.

On behalf of the Steering Committee, and particularly Tasha Youstin and Phil Kopp, whose diligence is suffuse in this research, thank you for considering our investigative findings, and for your attention to this vital informational concern to our students.

cc: Dr. William P. Kelly, President
Dr. Chase F. Robinson, Provost and Senior Vice President
Dr. Stephen Brier, Vice President for Information Technology and External Programs

Attachment

The Graduate School and University Center is The City University of New York's doctorate-granting institution, which operates in consortium with all the CUNY campuses: ○ Bernard M. Baruch College ○ Borough of Manhattan Community College ○ Bronx Community College ○ Brooklyn College ○ The City College ○ The City University of New York Medical School ○ The City University of New York School of Law at Queens College ○ The College of Staten Island ○ Medgar Evers College ○ Eugenio María de Hostos Community College ○ Hunter College ○ John Jay College of Criminal Justice ○ Kingsborough Community College ○ Fiorello H. LaGuardia Community College ○ Herbert H. Lehman College ○ New York City Technical College ○ Queens College ○ Queensborough Community College ○ York College

For many students, the excitement of getting a graduate school acceptance letter is followed by the question: "How am I going to pay for this?" Oftentimes student loans from the federal government is a leading source of this payment process, and the financial aid office often determines the amount of federal aid an individual student is eligible for. While any grants, scholarships, or remissions the student may have been awarded are considered, the students expected family contribution, as determined by the student's Free Application for Federal Student Aid (FAFSA), is subtracted from the university's estimated cost of attendance to determine the amount of aid a student can receive. This makes the university's cost of attendance figure so very important.

Recently it was brought to our attention that the Graduate Center's cost of attendance figure might be considerably lower than it should be; in investigating this, we looked at other universities in the New York, New Jersey, and Connecticut area, as well as the United States Department of Education website, to determine how cost of attendance estimates are derived. What we found was that individual universities are free to develop their own cost of attendance figures; indeed, several of the universities had different figures for different colleges and programs within their own university!

Below you will find a table containing cost of attendance figures for the Graduate Center, as well as other schools in our area. The reported figures are for graduate programs within each university, with the exception of Rutgers.

Cost of Attendance for CUNY and Surrounding Universities							
	Graduate Center[a]	NYU[c]	Columbia[acd]	New School[b]	Fordham[cd]	Rutgers[e]	Yale[f]
Housing	7425	17335	17550	12260	12050	9942	18000
Food	2776			3000			
Transportation	850	684		684	790		
Books and Supplies	1016	1016	2000	920-2050	840		
Personal/Misc	3676	4315	3487	1550	6130		
Total	15743	23350	23037	17494	19810	9942	18000
[a] Figures based on the 9 month school year							
[b] Estimated figures are based on student surveys and updates from the Bureau of Labor Statistics							
[c] Housing figure includes room (rent, utilities) and board							
[d] Based on Graduate School of Arts and Sciences (Each school produces their own estimate)							
[e] Typical room, board, and fees for New Brunswick student living on campus							
[f] Includes all expenses							

What seems pretty clear is that the Graduate Center's estimated cost of attendance figure is low when compared with others universities in New York City, as well as Yale in New Haven, CT. It is within the Graduate Center's power to reevaluate this figure, and to do so would undoubtedly benefit students.

View these figures and more information at the following websites:

Graduate Center:
http://www.gc.cuny.edu/current_students/tuition_curnt_stdnts.htm

NYU:
ttp://www.nyu.edu/financial.aid/tuitiongrad.html

Columbia:
http://www.columbia.edu/cu/sfs/docs/Grad_Fin_Aid/Cost_of_Attendance/

New School:
http://www.newschool.edu/studentservices/financialaid/attendance-cost.aspx?s=1:4

Fordham:
http://www.fordham.edu/tuition__financial_a/graduate_students/graduate_student_tui/cost_of_attendance_b_22621.asp

Rutgers:
http://admissions.rutgers.edu/0401.asp

Yale:
http://www.yale.edu/graduateschool/financial/costs.html

CHAPTER 2

Cost of Attendance (Budget)

Awards for each of the Federal Student Aid programs are based on some form of financial need, beginning with cost of attendance. This chapter picks up at the point where you have established the student's EFC (see the Application and Verification Guide) and the student's basic eligibility (see Volume 1). Most schools establish average costs for different categories of students and set these cost categories in EDExpress or other software that they use to determine awards and package aid. The typical costs that you establish for your students will be used to calculate their Pell Grant, Academic Competitiveness Grant (ACG), National Science and Mathematics to Retain Talent Grant (National SMART), Stafford, Campus-Based, awards (Chapters 3,4, 5, and 6) and package their aid (Chapter 7).

Unlike scholarship programs that may award funds based on academic merit or the student's field of study, "need-based" grants, loans, and work-study are based on the family's demonstrated financial need for assistance.

The cost of attendance is the cornerstone of establishing a student's financial need, as it sets a limit on the total aid that a student may receive for purposes of the ACG/National SMART Grant programs, Campus-Based Programs and Stafford/PLUS loans, and is one of the basic components of the Pell Grant calculation.

CHAPTER 2 HIGHLIGHTS

Allowable Costs

Determined by school, taking into account:

- → Tuition and fees
- → Books, supplies, transportation, personal, misc.
- → Room and board
- → Dependent care
- → Study abroad expenses
- → Disability expenses
- → Employment expenses for co-op study
- → Loan fees

Exceptions

- → Less than half-time enrollment
- → Correspondence study
- → Incarcerated students
- → Professional judgment

Costs met from other sources

- → Tuition and fees not paid by student
- → Free room and board
- → Other cost specified by source

Costs for period of enrollment

- → Campus-Based and Stafford/PLUS are based on costs for the period of enrollment; for instance, costs for a student attending a single semester in the school year would be limited to the costs for that time period.
- → Pell and ACG/National SMART are always based on the cost of full-time attendance for a full academic year.

ALLOWABLE COSTS

The cost of attendance for a student is an estimate of that student's educational expenses for the period of enrollment. As we'll see, you can use average expenses for students at your school, rather than actual expenses. For example, for the tuition and fees component, you can use the same average amount for all full-time students, instead of figuring the actual tuition and fees for each individual student. You can have different standard costs for different categories of students, such as a cost of attendance for out of state students (who have higher tuition) and a lower cost of attendance for in state students. However, you cannot combine the COA figures for each separate enrollment status and award aid to a student on the basis of the average COA. Students must be awarded on the bases of a COA comprised of allowable costs assessed all students carrying the same academic workload.

If a student is enrolled in a program that has extra fees or costs, such as lab fees, you can add those fees to the student's cost or use a standard cost that you've established for all students in that program. If you establish standard cost categories, you must apply the cost allowances uniformly to all students in those categories.

Cost of attendance components
The cost of attendance is determined by law (Higher Education Act, Sec. 472) and is not subject to regulation by the Department.

The law specifies the types of costs that are included in the cost of attendance, but you must determine the appropriate amount to include for each category for students at your school.

Less than Half Time COA Components
For students who are less than half time, COA can include only:

- tuition and fees
- an allowance for books and supplies
- transportation (but not miscellaneous & personal expenses) and
- an allowance for dependent-care expenses.
- a limited allowance for room and board, see p. 3-21.

Documentation of exceptional expenses
The law doesn't specify what documentation you must collect for expenses such as dependent care or disability-related expenses. You can document these expenses in any reasonable way, such as documenting an interview with the student or obtaining a written statement from the student or other appropriate sources.

HERA and reduced origination fees
HERA reduced the origination fees for FFEL and Direct loans. Make sure the COA allowance in your packaging software reflects the lower percentages. For details, see DCL GEN-06-02.

Disabled student
A student is considered disabled if he or she has a physical or mental impairment that substantially limits a major life activity, such as if the student is deaf, mentally disabled, hard of hearing, has a speech or language impairment, is visually disabled, seriously emotionally disturbed, orthopedically impaired, autistic, has a traumatic brain injury, is otherwise health-impaired, or has specific learning disabilities that require special education and related services.

There are different ways to arrive at average costs for your students, such as periodic surveys of your student population and local housing costs.

Allowable costs in general

The types of costs that may be included are the same for all FSA programs. The cost of attendance for the Campus-Based and Stafford/PLUS programs is a student's cost for the period in which the aid is intended. The cost of attendance used for ACG & National SMART Grants and Pell Grants is always the full-year costs for a full-time student, so you may have to prorate actual or average costs up for students who are attending less than an academic year (or who are part-time in a term program) or prorate down for students who are attending for periods longer than an academic year. We'll discuss this at the end of this chapter.

A student's cost of attendance generally is the sum of the following:

- **The tuition and fees normally assessed for a student carrying the same academic workload.** This includes costs of rental or purchase of equipment (including equipment for instruction by telecommunications), materials, or supplies required of all students in the same course of study.

- **An allowance for books, supplies, transportation, and miscellaneous personal expenses.** This can include a reasonable amount, as determined by your school, for the documented rental or purchase of a personal computer that the student will use for study for the enrollment period. For example, a computer purchased in the summer for use in the fall term may be included.

- **An allowance for room and board.** For students without dependents living at home with their parents, this will be an allowance that you determine. For students living on campus, the allowance is the standard amount normally assessed most residents. For those living off campus but not with their parents, the allowance must be based on reasonable expenses for the student's room and board (see example on next page).

- **For a student with dependents, an allowance for costs expected to be incurred for dependent care.** This covers care during periods that include, but that are not limited to, class time, study time, field work, internships, and commuting time for the student. The amount of the allowance should be based on the number and age of such dependents and should not exceed reasonable cost in the community for the kind of care provided.

- **An allowance for the one time direct costs of obtaining a first professional license or certificate for students who are enrolled in a program that requires such professional licensure or certification.** This allowance may only be provided one time per student per eligible academic program. Examples of allowable costs are fees charged to take a licensing exam and costs of

applying for and obtaining the license or certification. The cost must be incurred during (not after) a period of enrollment, even if the exam is after the end of the period.

- **For study-abroad programs approved for credit by the student's home institution, reasonable costs associated with such study.**

- **For a disabled student, an allowance for expenses related to the student's disability.** These expenses include special services, personal assistance, transportation, equipment, and supplies that are reasonably incurred and not provided by other agencies.

- **For students engaged in a work experience through a cooperative education program, an allowance for reasonable costs associated with such employment.**

- **For students receiving loans, the fees required to receive them (for example, the loan fee for a Direct Loan or the origination fee and insurance premium for a FFEL).** You may also include the fees required for nonfederal student loans (that is, nonfederal loans that must be considered EFA for the student when packaging aid). In all cases, you can either use the exact loan fees charged to the student or an average of fees charged to borrowers of the same type of loan at your school. To be included in the COA, any loan fees for private loans must be charged to the borrower during the period of enrollment for which the loan is intended.

Free room and board example

Guerrero University saves some of its Resident Assistant jobs for students with exceptional financial need. All Resident Assistants receive a waiver of room and board charges. If the student quits the job, the waiver is removed and the student has to pay the room and board charges. All the students have the room and board charges in their cost of attendance. For students who are Resident Assistants because of their financial need, Guerrero must count the room and board waiver as estimated financial assistance. If the waiver is not included in taxable income, then the student must report the waiver amount as untaxed income on the FAFSA.

Exceptions to the normal cost allowances

The following are the exceptions to the normal cost of attendance allowances discussed above:

- For students who are enrolled **less than half time,** only the costs for tuition and fees and allowances for books and supplies, transportation, a limited amount of room and board, and dependent care expenses may be included as part of the cost of attendance (miscellaneous expenses, and personal expenses may not be included).

- Generally, the cost of attendance for **correspondence study** is restricted to tuition and fees, which often include books and supplies. If the costs of books and supplies are separate, then they may also be counted in the cost of attendance. If the student is fulfilling a required period of residential training, the cost of attendance can also include required books and supplies, an allowance for travel, and room-and-board costs specifically incurred for the period of residential training (as mentioned in Chapter 1 of *Volume 1: Student Eligibility,* a student isn't eligible to receive FSA aid for correspondence courses unless the student is enrolled in an associate-, bachelor's-, or graduate-degree program).

- The cost of attendance for **incarcerated students** is limited to tuition and fees and required books and supplies. Remember that an incarcerated student is ineligible for FSA loans, and if the student is in a federal or state penal institution, he is ineli-

HERA on Less than half time room and board COA allowance

HEA Sec 472(4)
DCL GEN 06-05
HERA legislation specifies that schools may include in the COA for a less-than-half-time student an allowance for room and board for up to three semesters (or equivalent), with no more than two of the semesters being consecutive at any one school. You are not required to monitor COA components from other schools attended by the student.

HERA Change to Estimated Financial Assistance Component of COA

HEA Sec. 480(j)
DCL GEN 06-05

If the source of assistance is a State and is designated by the State to offset a specific component of the student's COA, the amount of that assistance may be excluded from both COA and EFA. You may exclude such assistance on a student-by-student basis, but if it is excluded, it must be excluded for both COA and EFA. If the amount excluded is less than the allowance provided in the student's COA, you must exclude the lesser amount.

Alternate example of waived or paid COA component

The state in which Guerrero University was founded charges all full-time students the same tuition charge. However, in-state students receive a voucher to cover the difference between what most states consider in-state versus out-of-state tuition. Guerrero has two options. The first option would allow Guerrero to include the same tuition charge in the full-time COA for all students and include the amount of the voucher as estimated financial assistance (EFA) in the respective students' financial aid packages. Alternatively, Guerrero could exclude the amount of the voucher from both COA and EFA, because the voucher must be used to explicitly pay a specific component of the COA. Regardless of the option Guerrero chooses, it must apply the option consistently.

WIA reimbursement contracts

Some WIA contracts operate on a reimbursement basis; that is, the student must fulfill the terms of the contract before WIA will reimburse the school for tuition and fee costs. If the student doesn't fulfill the terms of the contract, the school is left with an unpaid tuition and fees charge. The school isn't permitted to hold the student liable for the unpaid tuition and fees. Contracts are established this way to offer schools an incentive to properly train and place students enrolled in the training programs. However, if a tuition and fees charge is included in a Title IV recipient's budget, the student would be liable for any outstanding charges that are not reimbursed by WIA. Therefore, schools that enter into reimbursement contracts *must remove the tuition and fees component* from the Title IV budget because, under these contracts, schools are prohibited from holding the student liable for outstanding charges.

gible for Pell grants no longer applies as well.

- You have the authority to use **professional judgment** to adjust the cost of attendance on a case-by-case basis to allow for special circumstances. Such adjustments must be documented in the student's file. (See "Professional Judgment" in the *Application and Verification Guide.*)

Costs waived or paid by other sources

When a specific component of a student's cost of attendance is waived or explicitly paid by another source, special treatment may be necessary. In some situations, the student is charged the normal tuition and fees charge with an offsetting credit issued. In other situations, the student is never charged tuition and fees at all. Although this section discusses this concept in terms of tuition and fee charges, it applies to any of the components of a student's cost of attendance.

In some cases, such as under Workforce Investment Act (WIA) programs, a student's tuition and fees are paid by another organization or are waived. The student's costs are based on what the school is actually charging the student, based on the agreement between the school and the student.

If the student is charged for the tuition and fees, even if the charge is eventually paid by someone besides the student (e.g., a scholarship agency or other source of aid), then that tuition and fee amount is included in the cost of attendance in most circumstances (see sidebar on "Alternate example of waived or paid COA component"). The tuition and fees payment would then be counted as estimated financial assistance. The charge is documented in the same way as for any non-WIA student—for instance, in your school's contract with the student or in the agreement with the WIA agency. (If your school charges the student for tuition and fees, your school would have to expect the student to pay the charge if the WIA agency or other source of assistance doesn't pay on the student's behalf.)

If the student is never charged for tuition and fees, then the cost of attendance wouldn't include the tuition and fees component. Some WIA agreements with schools provide that the school can't charge the tuition and fees to the student, even if WIA doesn't cover the costs. If your school is prohibited under such an agreement from charging tuition and fees to the student, then the tuition and fees aren't included in the student's cost of attendance, and, therefore, that amount would not be included as estimated financial assistance.

Even if there's no tuition and fees component, the student's budget still includes the other costs listed previously, such as an allowance for living expenses. Note that a Pell Grant award to a student who has no tuition and fees may need to be based on the Alternate Schedule for "Tuition Sensitivity" (discussed in Chapter 3). The option to either include the cost and aid in both COA & EFA versus excluding both from COA & EFA only applies to non Federal sources of assistance, and only when that assistance is designated to offset specific components of COA (ie tuition, room and board).

COSTS FOR PERIODS OTHER THAN NINE MONTHS

The cost of attendance used to package ACG & National SMART, as well as Campus-Based aid and Stafford/PLUS loans covers the student's actual period of enrollment. Therefore, if the student will be attending for more than 9 months, you must use a higher cost of attendance that includes living expenses, such as room and board, for the longer period of time. If the student will be attending for less than 9 months, you must use a lower cost of attendance. You can choose to prorate the allowances you use for 9 months, or can calculate the cost in any other reasonable way.

Adjusting Costs for Pell

The types of costs included in the Pell budget are the same as those for the other FSA programs; however, Pell costs are always based on the costs for a *full-time student for a full academic year.*

For Pell, costs for programs or enrollment periods longer or shorter than an academic year must be prorated so that they are the costs for one full academic year. This is true for both parts of the academic year definition: if either the number of weeks or the number of clock/credit hours differs from the academic year standard, the costs must be prorated to determine the full-time, full-year Pell budget. The need to prorate Pell costs is most likely to occur in these situations:

- a term-based program that provides less than 30 weeks of instructional time in an academic year.
- a nonterm program that provides less than 24 semester hours, 36 quarter hours, or 900 clock hours and/or provides less than 30 weeks of instructional time in an academic year; or
- a program that is longer than an academic year, where the costs for the entire program are charged at the beginning of the program.

There are two ways to prorate Pell and ACG/National SMART costs, as shown in the first two examples at the end of this section. Both of these examples are based on a program that is shorter than an academic year. The third example shows how costs are prorated when they are charged for a program that is longer than an academic year.

If the student is in a category where costs are limited, such as less-than-half-time enrollment, those costs that are allowable must be based on costs for a full-time student for a full academic year. For instance, the tuition component of the Pell cost of attendance for a less-than-half-time student must be based on the tuition costs that would be incurred by a full-time student attending a full academic year.

Note that prorating the cost of attendance usually does not affect the amount of Pell Grant the student receives. However, you're required to report the full-time, full-year Pell budget when reporting disbursements to COD.

Costs for a period otherthan 9 months

For Stafford, PLUS, ACG/National SMART and Campus-Based aid, the cost of attendance used for packaging must reflect the student's cost for that period that he or she is actually enrolled.

For instance, if a student is completing her program of study by taking a 1/2-time course load for the fall semester at your school, and that's the only term that she'll be attending in the award year, you could use the actual tuition and fee charges for the student's costs. If you use average costs for living expenses for a 9-month academic year for students in that program, you may divide your average costs by the number of terms in the academic year to find the cost for this enrollment period (assuming the terms are substantial in length).

For Pell Grants and ACG/National SMART, you could either use an average tuition cost for a full-time, full-year student in the program or prorate the student's actual tuition for the fall term to arrive at a full-year, full-time cost. Costs for living expenses may also be average costs for a full academic year—if a full-year average cost is used, it doesn't have to be prorated for Pell and ACG/National SMART Grant awards.

Costs for full program charged at start

A school may charge the total tuition cost for a program at the beginning of the first period of enrollment. If the program is longer than an academic year, for Stafford/PLUS loans and Campus-Based aid, the tuition costs apply only to the first period of enrollment. For Pell, you must prorate these charges to reflect the academic year in accordance with the procedures outlined in Chapter 3.

Changes in Pell COA

For more on when changes in Pell COA necessitate a recalculation of a Pell award, see Volume 3, Chapter 3.

Pell Grant Cost Example #1: prorating total costs by lesser of two fractions

You may take the student's entire cost of attendance (tuition and fees, room and board, etc.) and multiply it by the lesser of the two fractions that represent the length of the academic year. If the lesser fraction is one, then you don't prorate the cost of attendance. One fraction is based on credit or clock hours and the other is based on weeks of instructional time, as shown in this example.

Let's use the example of a program that charges $10,500, awards 18 semester credits, and is completed by most full-time students within 20 weeks of instructional time.

$$\frac{\text{Credit/clock hours in academic year definition} = 24}{\text{Credit/clock hours awarded} = 18} \qquad \frac{\text{Weeks in academic year definition} = 30}{\text{Weeks provided} = 20}$$

Since the fraction using credit hours is the lesser fraction, the program cost of $10,500 is multiplied by 24/18 to find the full-year Pell cost.

$$\$10,500 \times 24/18 = \$14,000$$

In this case, the full-time cost is $14,000. (Note: If one of the fractions is equal to one, for instance, if the program awards 24 credit hours, then the prorated cost is the same as the original cost of attendance.)

Pell Grant Cost Example #2: prorating academic costs & living expenses separately

As an alternative, you can separately prorate the costs associated with credit or clock hours (tuition and fees, books and supplies, loan fees) and the costs associated with weeks of instructional time (room and board, miscellaneous expenses, disability expenses, transportation, dependent care, study abroad, reasonable costs associated with employment as part of a cooperative education program).

Using our earlier example of a program lasting 20 weeks and awarding 18 credit hours, and specifying that the student's tuition, books, supplies, etc come to $4,500 and living expenses amount to $6,000, the calculation would look like this:

$$\frac{\text{24 credit hours}}{\text{18 credit hours}} \times \$4,500 = \$6,000$$

$$\frac{\text{30 weeks}}{\text{20 weeks}} \times \$6,000 = \$9,000$$

In this example, the student's Pell budget is the sum of the two prorated costs, or $15,000.

Pell Grant Cost Example #3: prorating costs for a nonterm program longer than an academic year

Costs must also be prorated if they are charged for a period longer than an academic year. You may use either of the proration methods shown in Examples 1 and 2.

We'll use the example of a program awarding 1,000 clock hours and providing 40 weeks of instructional time. Let's assume that the school uses the regulatory minimums in defining the academic year as 900 clock hours and 30 weeks.

The total costs over the 40 weeks, including tuition and living expenses, is $5,900. If we use the method in Example 1, this amount must be prorated by the lesser of the following two fractions.

$$\frac{\text{Credit/clock hours in academic year definition} = 900}{\text{Credit/clock hours awarded} = 1000} \qquad \frac{\text{Weeks in acad. year definition} = 30}{\text{Weeks provided} = 40}$$

The lesser of the two fractions is the one based on weeks (3/4). Multiply the total program cost by this fraction to determine the Pell costs for a full academic year: $5,900 x 3/4 = $4,425.

Pell Grant cost of attendance for a consortium program

A student receiving a Pell Grant for attendance at two schools through a consortium agreement may have costs from both schools at the same time. The student's cost of attendance is calculated in the same way as for a student taking classes at only one school. The student's charges for tuition and fees and books and supplies at the consortium schools have to be combined into a single charge for a full academic year for purposes of the Pell calculation. The school paying the student can choose to use actual charges for the student, which would simply be the sum of the actual charges at both schools. Of course, if the student isn't attending full-time, your school will have to prorate these tuition and fees and books and supplies charges so that they are the correct amounts for a full-time, full-year student.

If the disbursing school is using average charges, then the average full-time charges at each of the schools must be prorated and combined. If the student is taking a full-time load at each school, the full-time tuition and fees charges for an academic year at each school can be averaged to determine the tuition and fee cost. However, if the student is taking an unequal course load, the disbursing school must prorate the charges based on the number of hours the student is taking at each school.

Pell Grant cost of attendance for a co-op program

If a student has a co-op job for the first term, the tuition and fees for that period can be prorated over the full academic year for the program (which must include at least 30 weeks of instructional time). This prorated amount is then added to the other cost of attendance components to arrive at the total cost for a full-time student for a full academic year.

For the rest of the year, your school can either use the cost of attendance with the projected amount or can recalculate the student's tuition and fees at the end of the first term to determine a new cost of attendance for the remaiining payment periods. This decision must be consistent with your school's overall policy on recalculating for changes in a student's costs. (See the discussion of Pell Grant recalculations in Chapter 3 of this volume for more information.) Note that the cost of attendance can also include employment-related expenses.