

**Policy Clarifications - Employment & Training -
Policy/Procedures
ESA388535**

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Agency: Headquarters

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Citations:

Subject: Issuing SPALS for Educational Fees

The recent Information Memorandum related to not issuing SPALS for items included in tuition seemed to imply that we are to not issue SPALS for fees unless the students own the items during the training or after he or she leaves the school or graduates. Is that a correct interpretation of the memo?

Response By: Denise Adams-Moore

Date:01/25/11

No. The intent of the information memorandum was to advise CAOs to look for requests for SPALS that are the only source of revenue for the school. BETP uncovered this practice when reviewing the financial aid practices of various schools. During that review, it was determined that the costs of certain fees were often inflated and were requested in the maximum SPAL amount and the items were used to purchase items that stayed with the school as part of their curriculum.

Example: A SPAL was requested for a wheelchair which the student needed to use during training but was not actually owned by the student during the training or after training was completed.

It is understood that many schools have fees that are required across the academic continuum and are not considered to be optional. Some examples are lab fees, technology fees, or activity fees. Items of this nature are acceptable.

To determine whether a fee is allowable, the CAO needs to have a discussion with the school about the types of fees that are being charged to the student. The CAO should ask questions such as:

1. Are the fees required for each student?
2. Are they required to be paid in order for the student to graduate from the institution?
3. Does the school also charge tuition independent of the fees?

If the answers to these three questions are yes, consider any other less costly, more practical methods to obtain the service or item that would satisfy the school before approving the SPAL.

EXAMPLE: The school indicates that a computer is required for the training and that the school will make the computer available to each student at a cost to the student. However, the same item can be obtained through a local retailer at a lower cost. The school indicates that it is acceptable for the student to obtain the computer from another source.

NOTE: If the CAO cannot determine if the school's fees should be paid as SPALs, questions can be directed to the policy unit at BETP: 717-787-1302.