**Title IV, HEA Q & A**

### Pass/Fail Coursework

Q: How do courses graded as "Pass/Fail" affect Satisfactory Academic Progress (SAP)?

A: Students may be permitted to take some or all classes on a pass/fail basis. It is also permissible for an institution to administratively determine that all coursework in a term will be evaluated on a pass/fail basis. An institution may modify its policies restricting the number of courses students may take on a pass/fail basis to accommodate the national emergency due to the coronavirus. Where an institution has no existing policy allowing pass/fail grades, it may adopt one, even if only temporarily. Courses taken on a pass/fail basis count as attempts for SAP purposes. Generally, pass/fail grades are not factored into a student’s GPA. However, an institution may follow its own policy with respect to the effect of pass/fail grades on GPA.

### Selective Service Status Information Letter

Q: How can an institution resolve a C Code for Selective Service registration if the Selective Service System (SSS) is unable to provide Status Information Letters during this national emergency?

A: We are aware that requests for a Status Information Letter from the SSS are not currently being considered. Therefore, to resolve a Selective Service C code for applicants who do not pass the database match, we recommend that applicants use the online system at [sss.gov](https://sss.gov/) to register or to verify prior registration. A financial aid administrator (FAA) may perform this task if he or she chooses or if the applicant cannot complete this task.

If the online process does not confirm the applicant's registration, the FAA has the authority to determine whether the applicant knowingly and willfully failed to register as required by Section 462(f) of the Military Selective Service Act. An FAA may consider special circumstances that may have prevented registration, and if the FAA determines the student – for example – did not knowingly and willfully fail to register for the selective service, the student may meet this eligibility requirement. The FAA should follow the process outlined in Volume 1 of the [2019-2020 Federal Student Aid Handbook](https://ifap.ed.gov/ilibrary/document-types/federal-student-aid-handbook?award_year=2019-2020&) and may do so in lieu of using the status information letter.

### Recordkeeping and Data Security

Q: Is the Department providing any flexibilities during this national emergency for record retention and data security requirements given the rapid change to telework for many institutional employees.

A: The Department cannot exempt an institution from record retention or data security requirements. An institution must use its judgment to determine whether it can securely use email or other electronic methods to exchange information with applicants and students. For example, an institution may determine that during the COVID-19 national emergency, they will accept documents (as permitted by the [Office of Postsecondary Education’s Updated Guidance for interruptions of study related to Coronavirus (COVID-19)](https://ifap.ed.gov/electronic-announcements/040320UPDATEDGuidanceInterruptStudyRelCOVID19), posted April 3, 2020) by photograph via smartphone or as a scanned document, as opposed to notarized or certified paper copies of documents that may be required under normal circumstances. In such instances, the institution must continue to properly preserve those documents for their records, which may include preserving text messages for the formal record or requiring students to provide hard copies, notarized copies or official copies of documents through the institution’s normal process when normal campus operations resume. We are providing flexibility to institutions regarding how they can collect documents during the national emergency, but institutions are still required to maintain the requisite documents in their records during and after the national emergency.