

TEACH Grant Program Counseling Requirements: Final Rule

Section 686.32 of the TEACH Grant Program Final Rule contains the counseling requirements for TEACH Grant recipients. While the U.S. Department of Education (ED) has indicated it will provide on-line, interactive TEACH Grant counseling on behalf of schools beginning in 2009-10, schools must provide grant recipients with initial, subsequent, and exit counseling until that time. Many aspects of the TEACH Grant counseling mirror those already provided by schools for Stafford Loan borrowers. The following chart outlines the TEACH Grant counseling requirements and compares them with those required for Stafford Loans. Starting on page 4, the requirements are then regrouped and additional detail is provided according to each category of TEACH counseling.

Counseling Requirements: High Level Comparison

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling	Loan Initial Counseling	Loan Exit Counseling
Conduct prior to making first disbursement to first-time recipient	✓			✓	
Conduct annually prior to first disbursement of each subsequent TEACH Grant award to previous recipient		✓			
Conduct prior to student ceasing attendance at institution and at time determined by institution			✓ <small>(Also required if student changes to ineligible program)</small>		✓
<ul style="list-style-type: none"> Provide within 30 days of discovering student has left institution without notification or without completing counseling 			✓ <small>(Also required if student changes to ineligible program)</small>		✓
Provide in person, by audiovisual presentation, or by interactive electronic means	✓	✓	✓	✓	✓
<ul style="list-style-type: none"> If conducted through interactive electronic means, take reasonable steps to ensure each recipient receives counseling materials and participates in and completes counseling 			✓		✓
<ul style="list-style-type: none"> May provide written materials to correspondence and study abroad students 	✓	✓	✓	✓	✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling	Loan Initial Counseling	Loan Exit Counseling
<ul style="list-style-type: none"> • May provide written materials if student leaves without notification or fails to complete counseling 			✓		✓
Individual with expertise in Title IV programs available shortly after counseling to answer questions	✓	✓	✓	✓	✓
Explain terms and conditions of TEACH Grant Agreement to Serve (ATS) in §686.12	✓	✓	✓	*	*
Provide information about how to identify low-income schools and documented high-need fields	✓		✓		
<ul style="list-style-type: none"> • Inform that in order for teaching to count towards service obligation, high-need field in which student will teach must be: <ul style="list-style-type: none"> ➤ One of the six high-need fields in §686.2, or ➤ A high-need field listed in Nationwide List at time and for state in which recipient begins teaching in field 	✓		✓		
Explain that conditions, such as felony conviction, could preclude student from completing service obligation	✓				
Inform that 4-year service obligation must be completed within first 8 calendar years after completing TEACH Grant-eligible program			✓		
Inform of opportunity to request suspension of 8-year period for completing ATS and conditions for which suspension is granted	✓		✓		
Explain that, until earlier of date service obligation is fulfilled or date grant becomes a loan, recipient will be required to submit annually to ED written documentation of his or her status as highly-qualified teacher in high-need field at low-income school or of his or her intent to complete 4-year service requirement			✓		

* Similar loan-specific content required for Stafford Loan counseling (e.g., terms and conditions of Master Promissory Note).

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling	Loan Initial Counseling	Loan Exit Counseling
Emphasize that failure or refusal to complete service obligation results in repayment of full amount of all TEACH Grants as an unsubsidized Direct Loan with interest accrued from each grant disbursement date	✓	✓			
• Explain circumstances under which TEACH Grant will be converted to an unsubsidized Direct Loan in §686.43	✓	✓	✓		
• Emphasize that once TEACH Grant is converted to an unsubsidized Direct Loan, it cannot be reconverted to a grant	✓	✓	✓		
• Review availability of ED's Student Loan Ombudsman's office	✓	✓	✓		✓
• Describe likely consequences of loan default, including adverse credit reports, wage garnishment, federal offset, and litigation	✓		✓	✓	✓
• Provide sample or average monthly loan repayment amounts based on range of student loan indebtedness	✓		✓	*	*
• Review available loan repayment options, including available repayment plans and loan consolidation			✓		✓
• Suggest debt-management strategies to facilitate repayment			✓		✓
• Explain how to contact ED's Direct Loan Servicing Center (DLSC)			✓		✓
• Review conditions under which recipient may defer or forbear loan repayment, obtain full or partial loan discharge, or receive teacher loan forgiveness			✓		✓
Inform of availability of Title IV loan information in National Student Loan Data System (NSLDS)			✓		✓

* Similar loan-specific content required for Stafford Loan counseling (e.g., terms and conditions of Master Promissory Note).

TEACH Grant Program *Initial* Counseling Requirements

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Conduct prior to making first disbursement to first-time recipient	✓		
Provide in person, by audiovisual presentation, or by interactive electronic means	✓	✓	✓
<ul style="list-style-type: none"> • May provide written materials to correspondence and study abroad students 	✓	✓	✓
Individual with expertise in Title IV programs available shortly after counseling to answer questions	✓	✓	✓
<p>Explain terms and conditions of TEACH Grant Agreement to Serve (ATS), informing grant recipient that:</p> <ul style="list-style-type: none"> • He or she must sign ATS and receive applicable TEACH Grant counseling prior to receiving TEACH Grant • For each TEACH Grant-eligible program for which grant funds are received, he or she must: <ul style="list-style-type: none"> ➢ Fulfill service obligation by serving as highly-qualified teacher at low-income school in high-need field in majority of classes taught during each elementary and secondary academic year, ➢ Upon completion of each year of service, submit certification of service by school's chief administrative officer, and ➢ Comply with terms, conditions, and other requirements for documenting, suspending, or discharging service obligation, or for repaying grant funds as a loan • He or she may request suspension of 8-year ATS completion period • If completing TEACH Grant-eligible program in field listed in Nationwide List, he or she cannot satisfy service obligation to teach in that high-need field unless high-need field in which he or she has prepared to teach is listed in Nationwide List for state in which he or she begins teaching, at time he or she begins teaching in that field • Failure or refusal to complete service obligation results in repayment of full amount of all TEACH Grants as an unsubsidized Direct Loan with interest accrued from each grant disbursement date 	✓	✓	✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Provide information about how to identify low-income schools and documented high-need fields	✓		✓
<ul style="list-style-type: none"> • Inform that in order for teaching to count towards service obligation, high-need field in which student will teach must be: <ul style="list-style-type: none"> ➤ Bilingual education and English language acquisition; ➤ Foreign language; ➤ Mathematics; ➤ Reading specialist; ➤ Science; ➤ Special education; or ➤ High-need field listed in Nationwide List at time and for state in which recipient begins teaching in that field 	✓		✓
Explain that conditions, such as felony conviction, could preclude student from completing service obligation	✓		
<p>Inform of opportunity to request up to 3-year (unlimited for military service) suspension of 8-year ATS completion period and conditions for which suspension is granted, including:</p> <ul style="list-style-type: none"> • Enrollment in TEACH Grant-eligible program or state approved teacher certification program • Condition covered by Family and Medical Leave Act (FMLA), such as: <ul style="list-style-type: none"> ➤ Birth of son or daughter ➤ Caring for spouse, child, or parent with serious medical condition ➤ Recipient's serious health condition • Call or order to active duty status in U.S. Armed Forces or National Guard for more than 30 days • Suspension must be requested before being subject to condition that converts grant to loan in §686.43 	✓		✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Emphasize that failure or refusal to complete service obligation results in repayment of full amount of all TEACH Grants as an unsubsidized Direct Loan with interest accrued from each grant disbursement date	✓	✓	✓
<ul style="list-style-type: none"> • Explain circumstances under which TEACH Grant will be converted to an unsubsidized Direct Loan, including if recipient: <ul style="list-style-type: none"> ➤ Requests conversion, regardless of enrollment status ➤ Fails to notify ED within 120 days of ceasing enrollment that he or she is employed, or still intends to pursue employment, as full-time teacher per terms of ATS ➤ Within 1 year of ceasing enrollment, he or she has not: <ul style="list-style-type: none"> - Been determined eligible for suspension, - Re-enrolled in TEACH Grant-eligible program, or - Begun teaching service per ATS ➤ Completes TEACH Grant-eligible program and: <ul style="list-style-type: none"> - Does not actively confirm with ED at least annually his or her intention to satisfy terms of ATS - Fails to begin or maintain qualifying employment within timeframe that would allow him or her to complete teaching service per ATS 	✓	✓	✓
• Emphasize that once TEACH Grant is converted to an unsubsidized Direct Loan, it cannot be reconverted to a grant	✓	✓	✓
• Describe likely consequences of loan default, including adverse credit reports, wage garnishment, federal offset, and litigation	✓		✓
• Provide sample monthly loan repayment amounts based on range of student loan indebtedness	✓		
• Review availability of ED's Student Loan Ombudsman's office	✓	✓	✓

TEACH Grant Program *Subsequent Counseling* Requirements

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Conduct annually prior to first disbursement of each subsequent TEACH Grant award to previous recipient		✓	
Provide in person, by audiovisual presentation, or by interactive electronic means	✓	✓	✓
<ul style="list-style-type: none"> • May provide written materials to correspondence and study abroad students 	✓	✓	✓
Individual with expertise in Title IV programs available shortly after counseling to answer questions	✓	✓	✓
<p>Review terms and conditions of TEACH Grant Agreement to Serve (ATS), informing grant recipient that:</p> <ul style="list-style-type: none"> • He or she must sign ATS and receive applicable TEACH Grant counseling prior to receiving TEACH Grant • For each TEACH Grant-eligible program for which grant funds are received, he or she must: <ul style="list-style-type: none"> ➢ Fulfill service obligation by serving as highly-qualified teacher at low-income school in high-need field in majority of classes taught during each elementary and secondary academic year, ➢ Upon completion of each year of service, submit certification of service by school's chief administrative officer, and ➢ Comply with terms, conditions, and other requirements for documenting, suspending, or discharging service obligation, or for repaying grant funds as a loan • He or she may request suspension of 8-year ATS completion period • If completing TEACH Grant-eligible program in field listed in Nationwide List, he or she cannot satisfy service obligation to teach in that high-need field unless high-need field in which he or she has prepared to teach is listed in Nationwide List for state in which he or she begins teaching, at time he or she begins teaching in that field • Failure or refusal to complete service obligation results in repayment of full amount of all TEACH Grants as an unsubsidized Direct Loan with interest accrued from each grant disbursement date 	✓	✓	✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Emphasize that failure or refusal to complete service obligation results in repayment of full amount of all TEACH Grants as an unsubsidized Direct Loan with interest accrued from each grant disbursement date	✓	✓	✓
<ul style="list-style-type: none"> • Explain circumstances under which TEACH Grant will be converted to an unsubsidized Direct Loan, including if recipient: <ul style="list-style-type: none"> ➤ Requests conversion, regardless of enrollment status ➤ Fails to notify ED within 120 days of ceasing enrollment that he or she is employed, or still intends to pursue employment, as full-time teacher per terms of ATS ➤ Within 1 year of ceasing enrollment, he or she has not: <ul style="list-style-type: none"> - Been determined eligible for suspension, - Re-enrolled in TEACH Grant-eligible program, or - Begun teaching service per ATS ➤ Completes TEACH Grant-eligible program and: <ul style="list-style-type: none"> - Does not actively confirm with ED at least annually his or her intention to satisfy terms of ATS - Fails to begin or maintain qualifying employment within timeframe that would allow him or her to complete teaching service per ATS 	✓	✓	✓
• Emphasize that once TEACH Grant is converted to an unsubsidized Direct Loan, it cannot be reconverted to a grant	✓	✓	✓
• Review availability of ED's Student Loan Ombudsman's office	✓	✓	✓

TEACH Grant Program *Exit Counseling* Requirements

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Conduct prior to student ceasing attendance at institution (or ceasing enrollment in TEACH Grant-eligible program) and at time determined by institution			✓
<ul style="list-style-type: none"> Provide within 30 days of discovering student has left institution or ceased enrollment in TEACH Grant-eligible program without notification or without completing counseling 			✓
Provide in person, by audiovisual presentation, or by interactive electronic means	✓	✓	✓
<ul style="list-style-type: none"> If conducted through interactive electronic means, take reasonable steps to ensure each recipient receives counseling materials and participates in and completes counseling 			✓
<ul style="list-style-type: none"> May provide written materials to correspondence and study abroad students 	✓	✓	✓
<ul style="list-style-type: none"> May provide written materials if student leaves without notification or fails to complete counseling 			✓
Individual with expertise in Title IV programs available shortly after counseling to answer questions	✓	✓	✓
<p>Explain terms and conditions of TEACH Grant Agreement to Serve (ATS), informing grant recipient that:</p> <ul style="list-style-type: none"> He or she must sign ATS and receive applicable TEACH Grant counseling prior to receiving TEACH Grant For each TEACH Grant-eligible program for which grant funds are received, he or she must: <ul style="list-style-type: none"> ➤ Fulfill service obligation by serving as highly-qualified teacher at low-income school in high-need field in majority of classes taught during each elementary and secondary academic year, ➤ Upon completion of each year of service, submit certification of service by school's chief administrative officer, and ➤ Comply with terms, conditions, and other requirements for documenting, suspending, or discharging service obligation, or for repaying grant funds as a loan He or she may request suspension of 8-year ATS completion period 	✓	✓	✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
<ul style="list-style-type: none"> • If completing TEACH Grant-eligible program in field listed in Nationwide List, he or she cannot satisfy service obligation to teach in that high-need field unless high-need field in which he or she has prepared to teach is listed in Nationwide List for state in which he or she begins teaching, at time he or she begins teaching in that field • Failure or refusal to complete service obligation results in repayment of full amount of all TEACH Grants as an unsubsidized Direct Loan with interest accrued from each grant disbursement date 	✓	✓	✓
Provide information about how to identify low-income schools and documented high-need fields	✓		✓
<ul style="list-style-type: none"> • Inform that in order for teaching to count towards service obligation, high-need field in which student will teach must be: <ul style="list-style-type: none"> ➤ Bilingual education and English language acquisition, ➤ Foreign language, ➤ Mathematics, ➤ Reading specialist, ➤ Science, ➤ Special education, or ➤ High-need field listed in Nationwide List at time and for state in which recipient begins teaching in that field 	✓		✓
Inform that 4-year service obligation must be completed within first 8 calendar years after completing TEACH Grant-eligible program			✓
<p>Inform of opportunity to request up to 3-year (unlimited for military service) suspension of 8-year ATS completion period and conditions for which suspension is granted, including:</p> <ul style="list-style-type: none"> • Enrollment in TEACH Grant-eligible program or state approved teacher certification program • Condition covered by Family and Medical Leave Act (FMLA), such as: <ul style="list-style-type: none"> ➤ Birth of son or daughter ➤ Caring for spouse, child, or parent with serious medical condition ➤ Recipient's serious health condition • Call or order to active duty status in U.S. Armed Forces or National Guard for more than 30 days • Suspension must be requested before being subject to condition that converts grant to loan 	✓		✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
Explain that, until earlier of date service obligation is fulfilled or date grant becomes a loan, recipient will be required to submit annually to ED written documentation of his or her status as highly-qualified teacher in high-need field at low-income school or of his or her intent to complete 4-year service requirement			✓
<ul style="list-style-type: none"> • Explain circumstances under which TEACH Grant will be converted to an unsubsidized Direct Loan with interest accrued from each grant disbursement date, including if recipient: <ul style="list-style-type: none"> ➤ Requests conversion, regardless of enrollment status ➤ Fails to notify ED within 120 days of ceasing enrollment that he or she is employed, or still intends to pursue employment, as full-time teacher per terms of ATS ➤ Within 1 year of ceasing enrollment, he or she has not: <ul style="list-style-type: none"> - Been determined eligible for suspension, - Re-enrolled in TEACH Grant-eligible program, or - Begun teaching service per ATS ➤ Completes TEACH Grant-eligible program and: <ul style="list-style-type: none"> - Does not actively confirm with ED at least annually his or her intention to satisfy terms of ATS - Fails to begin or maintain qualifying employment within timeframe that would allow him or her to complete teaching service per ATS 	✓	✓	✓
• Emphasize that once TEACH Grant is converted to an unsubsidized Direct Loan, it cannot be reconverted to a grant	✓	✓	✓
• Review availability of ED's Student Loan Ombudsman's office	✓	✓	✓
• Describe likely consequences of loan default, including adverse credit reports, wage garnishment, federal offset, and litigation	✓		✓
• Provide average anticipated monthly repayment amount based on range of student loan indebtedness			✓
• Review available loan repayment options, including standard, graduated, extended, income-contingent, and income-based repayment plans and loan consolidation			✓
• Suggest debt-management strategies to facilitate loan repayment			✓

	TEACH Grant Initial Counseling	TEACH Grant Subsequent Counseling	TEACH Grant Exit Counseling
<ul style="list-style-type: none"> • Explain how to contact ED's Direct Loan Servicing Center (DLSC) 			✓
<ul style="list-style-type: none"> • Review conditions under which recipient may defer or forbear loan repayment, obtain full or partial loan discharge, or receive teacher loan forgiveness 			✓
Inform of availability of Title IV loan information in National Student Loan Data System (NSLDS)			✓