



## Student Awards & Financial Aid

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**TO:** United States Department of Education  
Federal Student Aid School Eligibility – Foreign School Program Participation Agreement

**DATE:** August 31, 2022

**RE:** 00668900 University of Windsor USFSA Recertification

**Subject:** Internship & Externship Programs

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The University of Windsor understands that internships and externships (including co-operative education programs) that are part of a program (i.e., a student is required to participate in, or is given the option to participate in the internship or externship) and are provided by organizations other than the institution are subject to the written arrangement requirements in 34 CFR 668.5.

Internships and externships are usually provided by organizations that are not eligible for participation in the FSA Programs. Because foreign institutions may have written agreements only with other institutions that are eligible to participate in the FSA Programs, foreign institutions are generally precluded from including internships and externships provided by ineligible organizations as part of a Title IV eligible program.

However, a foreign institution may include, as part of a program that is eligible for participation in the FSA Programs, internships or externships offered by non-eligible organizations if the internship or externship is governed by explicit standards of an outside oversight entity, such as an accrediting agency or government entity, that require the oversight and supervision of the institution, where the institution is responsible for the internship or externship and students are monitored by qualified institutional personnel.

In addition, the University of Windsor acknowledges the following recent amendments to permit written arrangements with an eligible institution in the United States to provide no more than 25 percent of a student's program:

- Amendment to permit written arrangements between a foreign institution and an ineligible entity for no more than 25 percent of a student's program, provided that the ineligible entity satisfies definition of "foreign institution".
- While stacking of the allowance for a student to complete up to 25 percent of their program at an eligible institution in the United States under proposed § 600.52 is not permitted, an exception is permitted for independent research done by an individual student in the United States for not more than one academic year for research conducted during the dissertation phase of a doctoral program (where the research can only be performed at a facility in the United States) under current § 600.51.

The following is a list of programs which have a co-op, internship, or externship component to them with their associated Title IV direct loan eligibility and rationale:

Degree/Program:	Title IV Eligibility:	Rationale:
Honours Modern Languages (with year abroad)	YES	Not more than 25% of eligible course work abroad.
All Education & Concurrent Education Programs	YES	External agency oversight and supervision <sup>1</sup> .
Business Administration (Co-op Option)	YES	External agency oversight and supervision <sup>2</sup> .
Bach. of Applied Sci – Engineering (Co-op Option)	YES	External agency oversight and supervision <sup>3</sup> .

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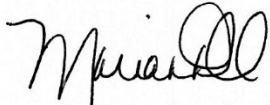
<sup>1</sup> Ontario Colleges of Teachers Act, 1996, Regulation 347/02 Accreditation of Teacher Education Programs from Ontario College of Teachers.

<sup>2</sup> [Co-operative Education and Work-Integrated Learning Canada \(CEWIL\)](#) and [Association to Advance Collegiate Schools of Business \(AACSB\)](#)

<sup>3</sup> [Co-operative Education and Work-Integrated Learning Canada \(CEWIL\)](#) and [Engineers Canada](#).

Bach. of Human Kinetics (Co-op Option)	YES	External agency oversight and supervision <sup>4</sup> .
Bach. of Science (Co-op Option)	YES	External agency oversight and supervision <sup>5</sup> .
Bachelor of Social Work	YES	External agency oversight and supervision <sup>6</sup>

Respectfully submitted,



Marian Doll, Director  
Student Awards & Financial Aid

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<sup>4</sup> [Co-operative Education and Work-Integrated Learning Canada \(CEWIL\)](#) and [Canadian Council of University Physical Education and Kinesiology Administrators \(CCUPEKA\)](#)

<sup>5</sup> [Co-operative Education and Work-Integrated Learning Canada \(CEWIL\)](#).

<sup>6</sup> [Canadian Association for Social Work Education](#)