



# Yale Law School

## Career Options Assistance Program (COAP) Policies & Procedures Classes of 2010-2014

Updated 1/4/2024



# Yale Law School

In 1989, Yale Law School pioneered a loan repayment assistance program to allow our students to take their dream jobs without worrying about their student loans. The Career Options Assistance Program (COAP) was one of the first loan repayment assistance programs of its kind and has since served as a model for similar programs at law schools across the country.

Today, COAP is one of the most distinctive, generous, and flexible loan forgiveness programs available at any law school. Over 2000 Yale Law School alumni have received \$58 million in support from COAP since its inception.

COAP provides substantial post-graduation assistance with educational loan repayment for those graduates who choose lower-paying positions and, as such, gives financial expression to the Law School's commitment to a full range of career opportunities. COAP is designed to cover the shortfall between graduates' educational loan payments and what they can afford to pay from modest incomes.

COAP also benefits our alumni in that it is:

***Inclusive***

- open to all recent Yale Law School graduates
- includes jobs in all sectors: public interest, government, academia and private practice

***Comprehensive***

- covers law school loans
- includes some undergraduate loans

***Flexible***

- no minimum participation commitment
- participants can move in and out of the program as needs change
- part-time work may be covered
- individual circumstances and special needs are taken into account

***Family Friendly***

- up to six months maternity/paternity leave per new child
- deductions are provided for child/dependent care

The purpose of this manual is to provide a comprehensive overview of COAP to ensure that all policies and procedures are transparent and universally applied to all COAP recipients. However, if any aspect of COAP needs clarification or if you wish to discuss your personal situation, we encourage you to contact the YLS Financial Aid office at any time for support.

P.O. Box 208215, New Haven, Connecticut 06520-8215 · Telephone 203-432-1688 · Facsimile 203-777-6140  
Courier Address 127 Wall Street, M13, New Haven, CT 06511 · Email [financialaid.law@yale.edu](mailto:financialaid.law@yale.edu)

## COAP Policies and Procedures

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**Note: As YLS' experience with the COAP program increases and as circumstances that motivate the existence of COAP change, there will be ongoing review and adjustment of the Program by the Yale Law School faculty and administration. Presently three COAP programs with varying guidelines are operating, which include COAP for Students Admitted Post September 1, 2011, COAP for Classes of 2010-2014, and COAP for Classes of 2009 and Earlier.**

***This Handbook is specific to COAP policies for Classes of 2010-2014.***

## **COAP ELIGIBILITY:**

To be eligible for COAP, participants must meet three eligibility criteria:

**1. Have graduated with a J.D., LL.M., M.S.L. or J.S.D. degree from Yale Law School**

Participants who do not complete a YLS degree or are on an LOA (during which loans may go into repayment) are not eligible for COAP support.

**2. Have loans in repayment status**

Repayment status is determined by the lender or loan servicer. Loans that are in any type of non-required payment status (i.e., in-school deferment, economic deferment, or forbearance are not eligible for COAP support.). Loans that are in delinquent status will not be eligible for COAP until they are returned to good repayment status. Loans that are in default are not eligible for COAP support and will not be considered for any future COAP support even if returned to repayment status. Graduates who continue on in school and are enrolled half-time or more must take a mandatory in-school deferment on their loans in lieu of repayment.

**3. Be gainfully employed**

For the purposes of COAP, gainful employment is defined as "earning a living wage sufficient to provide the necessities and comforts essential to an acceptable standard of living". The Financial Aid Office reserves the right to request documentation attesting to a participant's standard of living to verify a "living wage." In addition, gainful employment does not include any "unreported employment" that is not claimed on U.S. or foreign taxes. Participants will be required to document their employment (through offer letters, current pay stubs, etc.) as part of the COAP application process (refer to page 8). Volunteer positions for which the participant is not monetarily compensated do not meet the definition of "eligible employment" for COAP purposes. Additional information on employment variations is referenced on page 13.

## **ELIGIBLE LOANS:**

COAP defines a student loan as:

- 1) a federal loan from the William D. Ford Direct Loan Program, including Direct Subsidized and Unsubsidized loans, Grad PLUS loans, and Perkins Loans
- 2) a private student loan compliant with Title 10 as set by the Department of Education, which includes Yale Loans and \*Refinanced Loans
- 3) a federal Direct Consolidation Loan

COAP takes the following borrowing from these defined student loans into an overall eligible loan balance for repayment:

- Need-based Unit Loans (as outlined on initial financial aid award)
- Loans borrowed for the calculated parent contribution
- \$30,000 of need-based undergraduate loans
- Authorized loans to support: YLS Computer /Technology Loan (up to \$3,000)
- YLS Suit Loan (up to \$350)
- YLS Clerkship Interview Travel Loan (up to \$1,500) (as of 1/2013)
- Bar Loan (up to \$10,000)
- Clerkship Loan (up to \$10,000/year for two years of clerkship)
- Effective January 1, 2024 – Up to five years of interest compounding on COAP-eligible loans while enrolled in subsequent programs. Participants must have started the PhD program prior to YLS or start a program within two years of graduation from YLS.

COAP does not take the following loans or loan borrowing into the eligible loan balance for repayment:

- Portion of loan borrowing in place of the calculated student contribution
- Portion of loan borrowing in place of the calculated spouse contribution
- Loans borrowed for educational expenses beyond YLS degree
- Loans from family members
- Loans from entities upon which future employment is contingent on the receipt of the funds
- Refinanced loans other than loans consolidated through the federal Direct Loan Consolidation program
- Conditional Academic Grants awarded to LL.M. students.

Loans must be in good status with your loan servicer/lender at all times while receiving COAP support. Loans that have previously been in default will not be COAP eligible even if they have been rectified to good status.

**\*Policy Change (effective as of the January – July 2015 COAP cycle)**

In addition to the Department of Education Consolidation loan, federal loans refinanced through some private lending vehicles now are eligible for COAP support. This private refinancing is defined as a commercial loan product from a recognized lender or lending platform for the sole, specific purpose of refinancing and/or consolidating the borrower's federal student loans.

All COAP recipients who are considering refinancing should contact the YLS Financial Aid Office to review this decision, its implications on your COAP award and to ensure that your refinancing lender meets this eligibility criteria before completing the refinancing process.

COAP participants are fully responsible for choosing an eligible refinancing lender and are encouraged to carefully weigh the benefits of refinancing their federal loans against the loss of possible repayment benefits/repayment plans from the Department of Education.

**COAP REPAYMENT:**

COAP takes the eligible loan balance and calculates repayment based on a 15/5-year amortization schedule where:

- A payment calculated on a 15 year-straight line repayment schedule of principal and interest applies to COAP years 1-5
- A payment calculated on a 5-year straight-line repayment schedule of the remaining principal and interest applies to COAP years 6-10

If the participant has multiple loans, the COAP-eligible loan balance uses the weighted average interest rate for all loans combined to achieve the repayment schedule.

COAP is structured in this manner so that ultimately, if a participant remains eligible in the program for the full 10 years of eligibility, the initial 15-year and much more accelerated 5-year repayment will balance to pay off the participant's full loan debt in 10 years.

It is important to note that participants will still have their own loan repayment plan (either chosen or assigned by their lender/loan servicer) exclusive of the COAP repayment schedule. Participants can work with the Financial Aid Office to determine how best to align the COAP repayment schedule with their individual loan repayment schedule(s).

Loans issued by Yale, including the Yale Student Loan and the Yale Graduate and Professional International Loan are exceptions to the 15/5 repayment calculation and instead are calculated to mirror their actual 10-year repayment amortization. Private loans with a mandatory straight-line 10-year repayment will also be paid similarly.

## **PARTICIPANT CONTRIBUTION**

COAP participants making less than a set income threshold will not be expected to make contributions toward their calculated COAP repayment. Those with adjusted incomes above that level will be asked to contribute a portion toward repaying their law school loans, with COAP covering the rest. Once the COAP repayment of eligible loans is calculated on either the 15-year (COAP years 1-5) or 5-year (COAP years 6-10 ) schedule, an assessment of the participant's contribution is made based on the following parameters:

<b>Adjusted Income</b>	<b>Participant Contribution</b>
Less than \$60,000	\$0
\$60,000 or more	25% of income over \$60,000

## **COAP INCOME ADJUSTMENTS**

The calculated income on which the participant's contribution is assessed includes the following adjustments:

*Assets:* Effective January 1, 2024, participants earn a \$10,000 asset shelter per COAP year since graduation from the Law School, which is excluded from the COAP asset contribution formula.

COAP Income will include the value of the participant's cash, savings, investments, and trusts. Excluded from the asset calculation are the value of primary residence, cars, and qualified retirement accounts (e.g. 401K, 403B, IRA, Roth IRA).

- Example: COAP participants with \$10,000 in Savings + \$ 10,000 in investments who were two years out from YLS graduation would have an asset calculation of \$ 0 (i.e. 20,000 in total assets minus \$20,000 shelter based on 2 years X \$10,000 shelter per year).

**Dependents:** COAP will deduct from gross income \$8,000 per dependent child. In addition, COAP will deduct reasonable and documented expenses for dependent care up to \$17,000 per child annually. If a spouse documents that he/she has forgone employment for the sake of dependent care, a similar \$17,000 adjustment to income will be made.

**Contributions to Retirement Plans** - based on documentation COAP will adjust from the gross income contributions to retirement plans (401K, 403B, IRA, Roth IRA, etc.) up to the annual maximum contribution limit as established by the IRS.

**Marriage/ Spouse:** A distinction in the COAP calculation is made depending on whether the COAP participant's spouse is a YLS alumni also in COAP.

<b>Married – 1 in COAP</b> <b>Applies to both non YLS spouse and YLS spouse if only one member of marriage is in COAP</b>	<b>Married both in COAP</b> <b>Applies to two married alums who are both in COAP concurrently</b>												
Joint Incomes  <i>Adjustments:</i> (-) Minus \$40,000 shelter on spouse's income (-) Minus spouse's annual education loan debt repayment  Income then applied to a modified version single participant formula  <table border="1"> <thead> <tr> <th>Adjusted Income</th> <th>Participant Contribution</th> </tr> </thead> <tbody> <tr> <td>Less than \$60,000</td> <td>\$0</td> </tr> <tr> <td>\$60,00 or more</td> <td><b>20%</b> of income over \$60,000</td> </tr> </tbody> </table> <i>Note- participant is changed to 20% of income over \$60,000 if married.</i>	Adjusted Income	Participant Contribution	Less than \$60,000	\$0	\$60,00 or more	<b>20%</b> of income over \$60,000	Income based on 50% of combined income  Applied to single participant contribution schedule:  <table border="1"> <thead> <tr> <th>Adjusted Income</th> <th>Participant Contribution</th> </tr> </thead> <tbody> <tr> <td>Less than \$60,000</td> <td>\$0</td> </tr> <tr> <td>\$60,00 or more</td> <td><b>25%</b> of income over \$60,000</td> </tr> </tbody> </table> Both participants receive full asset exclusion.  Both participants receive 50% of dependent adjustment and 50% of childcare deduction	Adjusted Income	Participant Contribution	Less than \$60,000	\$0	\$60,00 or more	<b>25%</b> of income over \$60,000
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**Note: COAP definition of marriage/spouse-** COAP requires that any participant who is legally married will report spouse income/assets on his/her COAP application. For same-sex couples- COAP considers spouse income if, based on the August 2013 Treasury ruling, participants file federal taxes as under the "married filing jointly "status.

**AWARD CALCULATION:**

The basic COAP award formula is:

$$\frac{\text{COAP Calculated Payment for Eligible Loan Balance (based on 15 or 5-year amortization)} - \text{Minus Calculated Student Contribution}}{1} = \text{COAP Award}$$

If a participant opts to take a student loan deduction on the 1040 tax return, then an adjustment of the marginal tax rate X, the amount of the reported deduction, will be used to adjust the COAP award.

### **COAP LENGTH OF ELIGIBILITY:**

Participants have 10 years of total eligibility in COAP. Those 10 years do not need to be consecutive participation. Participants must, however, initially enter COAP for the first time within 10 years of degree completion from YLS.

#### **Delayed Participation in COAP or breaks in participation:**

For graduates who do not enter the program immediately after graduation or return to COAP after initial participation, the loan amount on which the COAP award will be calculated is the lesser of: the loan balance based on the standard 10-year repayment schedule during those periods outside of COAP or 2) the actual balance of the loan (if a participant had opted to proactively pay his/her loan down on a more accelerated schedule than 10 years.)

Example:

- COAP Participant has \$125,000 in initial COAP-eligible loans at an average interest rate of 7.5%.
- Participant works for a firm for two years and then, based on transitioning to a public service position, enters COAP three years after YLS degree completion.
- If paid on a 10-year repayment, the \$125,000 in initial loans @ 7.5%, would yield a balance after 24 months of payment of = \$106,870
- The initial COAP balance used to impute the award is then \$106,870.

### **APPLYING FOR COAP**

#### **COAP Application System:**

Graduates seeking support must use the COAP application system ([LINK](#)). This online resource provides an accessible way for alumni to not only apply to COAP but also upload electronically all required support materials. The Yale Net ID and password are needed to log into the COAP application system. To reactivate a Net ID, a new PIN must be generated, for which graduates should contact the YLS Financial Aid Office directly.

The online application (see Appendix 1) will request basic demographic information, marriage/dependent status, current educational loan debt, adjusted gross income, and current asset balances. In addition, participants will be required to upload the following documentation:

- Loan statements: can be satisfied with current screen shots from the participant's online account with his/her loan servicer but must include *all loans* for which COAP support is sought. Note if participants have some loans in repayment and some remaining in a grace period, he/she can apply for COAP support for the loans in repayment and then update the application later to request additional assistance when the remaining loans go into repayment.
- Income verification: can be satisfied with current paystubs or employment letters (in the case of new or first-time employment) offer letters. Self-employed individuals can utilize a 1099 form, 1040 tax returns, or contractual agreements for prospective services to be paid during the COAP support period. Note that tax returns (IRS Form 1040) are required for the second COAP cycle application (see below "COAP Application Cycles"), at which time employment income from the first COAP cycle will be re-verified against the tax returns. If there is a discrepancy in the income



initially reported in the first COAP cycle application versus the submitted tax returns, YLS reserves the right to make an award adjustment.

The online application system automatically sends periodic notifications to applicants of missing documentation or income application elements. Documents that are unable to be uploaded to the online system can be emailed to [financialaid.law@yale.edu](mailto:financialaid.law@yale.edu), faxed to 203-777-6138 or mailed to Yale Law School Financial Aid, P.O. Box 208215, New Haven, CT 06520-8215.

**COAP Application Cycles:**

COAP has two application cycles annually:

- Cycle 1: Cycle opens on November 1 and closes on May 31 - support for January-July loan payments
- Cycle 2: Cycle opens on June 1 and closes on October 31 - support for August-December loan payments

COAP applications for each specific cycle open approximately 30 days prior to the application deadline. Current COAP recipients receive automatic emails notifying them of the application cycle opening. Because COAP payments involve multiple Yale offices (see below "COAP Payments"), the processing of a COAP application may take up to 4 weeks (with first-time applications taking up to 6 weeks because they need to be established as Yale vendors by central Accounts Payable.) Therefore, we encourage all participants to apply as soon as the application cycle opens. Late applications submitted past the stated deadline can still be accepted but will be processed on a rolling basis.

In addition, participants who become COAP eligible mid-cycle either through an income, family status, or loan repayment status change may also apply at the time of eligibility to receive a prorated award. Recent graduates who traditionally have a six-month grace period following degree completion and will not enter repayment until November or December of their graduation year may apply for prorated support for the one or two months they are in repayment during Cycle 2.

**COAP Award Notification:**

Following the review of a completed COAP application, the participant will receive an official award notification which will document how the award was derived including:

- Calculation of 15-year (COAP Years 1-5) or 5-year (COAP Years 6-10) amortization of COAP eligible loan balance
- Calculation of participant's contribution to loan repayment based on COAP adjusted income.

***The notification also stipulates that the award is made based on the loan balance, income, and employment conditions as specified in the initial COAP application. By accepting the award, participants agree to notify the YLS Financial Aid Office immediately if any of those conditions change during a COAP award cycle. The YLS Financial Aid Office then reserves the right to re-review the award and make adjustments according to COAP policies.***

Review of the COAP application and award notification is traditionally a 4–6-week process. If there is an immediate need for a COAP award, please contact the Financial Aid Office to discuss the individual circumstances.

## **COAP Payments:**

COAP payments are processed by central Yale Accounts Payable through check requests submitted by the Law School. As such, all COAP participants are set up and treated as "vendors" in the Yale Accounts Payable system in order to expedite payments. The vendor setup process involves the participant's completion of a W-9 Form for U.S. citizens or a W-8 for non-U.S. citizens.

Participants may opt to be paid by check via traditional USPS or may complete a direct deposit form in order to have COAP payments transferred directly to their personal bank accounts. Direct deposit need only be completed for the first COAP award and then will carry forward for subsequent COAP cycles. Information on direct deposit is sent to all recipients with their first COAP award. If bank account information changes, it is the obligation of the participant to notify Yale Accounts Payable. Non-U.S. citizens or U.S. citizens abroad must maintain a valid U.S. bank account if they wish to use the direct deposit option. Participants are then responsible for using the COAP award to make direct payments on their loans.

Yale-issued loans, including the Yale Student Loan and the Yale Graduate and Professional International Loan, are directly paid by the Law School to the Yale Student Loan Office via a transfer of funds. COAP participants do not need to make payments on these loans directly but should conscientiously review their account statements to ensure that payments are being credited properly.

## **Taxability of COAP Awards**

In situations related to tax implications of a COAP Award, participants are encouraged to consult with a tax advisor as the Law School is not in a position to offer tax advice.

For COAP participants employed by other than a governmental entity in the United States or a 501(c)3 organization, the University will file an IRS 1099 form reporting "miscellaneous income" to the Internal Revenue Service.

For COAP participants employed by a governmental agency in the United States or a 501 (c)3 organization, the University, in compliance with Section 108(f) of the Internal Revenue Code (see below), will issue the COAP award as a loan which will be forgiven at the end of each calendar year. As a forgivable loan, these funds are not considered miscellaneous income for the sake of tax purposes and a 1099 form is not required. As loans, these COAP awards will require a Promissory Note to be completed by the participant each COAP award cycle. Participants will also receive annually a statement that the loan has been fully forgiven by Yale and are encouraged to retain said documentation for tax purposes.

Note that students who are considered "employed by Yale," even if they perform services for another entity through a fellowship, are disqualified from the forgiveness provision in Section 108(f) of the IRS Code and the University will file and report a 1099 form on their behalf.

### ***Text of Section 108 (f) of the Internal Revenue Code***

#### f) Student loans

##### (1) In general

In the case of an individual, gross income does not include any amount which (but for this subsection) would be includible in gross income by reason of the discharge (in whole or in part) of any student loan if such discharge was pursuant to a provision of

such loan under which all or part of the indebtedness of the individual would be discharged if the individual worked for a certain period of time in certain professions for any of a broad class of employers.

(2) Student loan

For purposes of this subsection, the term "student loan" means any loan to an individual to assist the individual in attending an educational organization described in section 170(b)(1)(A)(ii) made by -

(A) the United States, or an instrumentality or agency thereof,

(B) a State, territory, or possession of the United States, or the District of Columbia, or any political subdivision thereof,

(C) a public benefit corporation -

(i) which is exempt from taxation under section 501(c)(3),

(ii) which has assumed control over a State, county, or municipal hospital, and

(iii) whose employees have been deemed to be public employees under State law, or

(D) any educational organization described in section 170(b)(1)(A)(ii) if such loan is made -

(i) pursuant to an agreement with any entity described in subparagraph (A), (B), or (C) under which the funds from which the loan was made were provided to such educational organization, or

(ii) pursuant to a program of such educational organization which is designed to encourage its students to serve in occupations with unmet needs or in areas with unmet needs and under which the services provided by the students (or former students) are for or under the direction of a governmental unit or an organization described in section 501(c)(3) and exempt from tax under section 501(a).

The term "student loan" includes any loan made by an educational organization described in section 170(b)(1)(A)(ii) or by an organization exempt from tax under section 501(a) to refinance a loan to an individual to assist the individual in attending any such educational organization but only if the refinancing loan is pursuant to a program of the refinancing organization which is designed as described in subparagraph (D)(ii).

## **Judicial Clerkships**

Graduates working as judicial clerks may participate in COAP, but program benefits for clerkships will be in the form of a loan rather than a grant.

The maximum total amount of a clerkship loan is \$10,000 per clerkship year to a maximum of two years (or \$20,000).

### **Repayment of Clerkship Loans:**

The loan is issued as a Yale Loan, presently carrying an interest rate of 7.5%. Repayment terms vary based on the following conditions:

- 1) If, after the clerkship, the participant is COAP income-eligible, the loan will be treated as a qualifying educational loan covered by COAP, and the necessary payments of principal and interest on the participant's behalf for as long as the participant is in the program based a straight line 10-year repayment schedule.
- 2) If at any time the participant leaves COAP or is no longer eligible for COAP support, the full balance of the Clerkship Loan (principal plus interest) is payable in full 12 months from the last day of COAP support.
- 3) If after the clerkship, the participant does not enter COAP, the full balance of the Clerkship loan (principal plus interest) is due 12 months from the end date of the Clerkship. Graduates who clerked for two years and borrowed two clerkship loans will have 24 months from the end date of the second clerkship to repay the loans.

**Clerkship Loan Application:**

Graduates seeking Clerkship Loan support should apply for eligibility using the traditional COAP online application system. In that application, it should be indicated under "Assistance Type" that the participant is seeking a "Clerkship Loan" and as requested, should indicate their clerkship start and end date. All other application elements should be completed including the submission of loan statements and documentation of employment in the Clerkship position.

**Clerkship Loan Awards:**

Clerkship loan recipients will receive a standard COAP award notification and will be required to submit a Clerkship Promissory Note and a Clerkship Truth in Lending Statement to enact the loan. This master promissory must include an original (ink) signature and, as such, be returned through U.S. postal mail.

The amount of loan for which a participant may qualify is calculated the same way that non-clerkship COAP eligibility is calculated based on an assessment of COAP-adjusted income and factoring in the required participant contribution.

The \$10,000 maximum eligibility will be prorated on a monthly basis based on the number of eligible months of Clerkship employment in that COAP cycle. Example: if a participant's loans go into repayment in November of the year of graduation and he/she is fully eligible for the maximum \$10,000 award based on his/her clerkship income, he/she would receive \$1,666 in November for COAP cycle 2 to support November – December loan payments (2/12ths) and then receive \$8,334 in January for COAP cycle 1 for his/her January-July payments (10/12ths).

Clerkship loan recipients have the same option for direct deposit of their funds as traditional COAP participants. As a loan, recipients will not receive a 1099 Miscellaneous Income for the clerkship loan payout.

**Joint Degrees and Post Law Degrees:**

**Joint Degrees:**

Six terms of eligible loan borrowing will be assumed into the COAP loan balance. YLS terms will be credited first to this six-term limit. Law debt from approved and declared joint degree programs (whether Yale or another institution) can be assumed for the balance up to the six-term limit.

Example: Joint degree in Law and Forestry which requires a 5-term enrollment at YLS and a 3-term enrollment at the School of Forestry. The COAP loan balance would include eligible loans from the five terms at Law and then one term of Forestry loans.

If, however, the joint degree program offers its own loan repayment assistance program, COAP will not support any loans for which this alternative assistance is available. COAP participants must disclose any alternative loan repayment assistance program on their COAP application and are expected to take advantage of this alternative support.

### Accelerated Integrated JD/MBA program

The traditional COAP award calculation for students in the AI JD-MBA program will be modified in the following way in order to compensate for a lesser total law loan debt based on two years of actual YLS enrollment (in lieu of the traditional three years of JD Law debt):

The COAP-eligible loan balance will be based on:

- 1) Actual 1L year COAP eligible loans
- 2) A calculated year of COAP-eligible loans for the 2L year
- 3) Actual 3L year COAP eligible loans

This loan balance will then be used to calculate an annual loan repayment based on the traditional COAP 15-year repayment for years 1-5 of COAP and the 5-year repayment for years 6-10 of COAP. The stated participant contribution (based on COAP adjusted income) will be applied to the annual loan repayment amount to derive the YLS COAP payout. *To account for the fact that the AI JD/MBA participant's actual attendance and borrowing for law school was only for 4 terms (or 2/3rds of the traditional JD attendance and borrowing), the YLS COAP payout will be adjusted accordingly by 2/3rds in determining a total COAP award.*

To derive the calculated 2L year of COAP-eligible loans, students in the AI JD/MBA program will need to submit a Need Access aid application to YLS for their 2L academic year even though they will be attending SOM in that year. Students should follow the stated YLS instructions and deadlines in submitting this application. Submission of the application is solely for the purpose of calculating a third year of imputed loan debt for COAP and not for the awarding of any other aid.

All other terms and conditions of the COAP program (including but not limited to overall eligibility, participant contribution formula, income adjustments, eligible loans, etc.) remain the same for AI JD-MBA students. This policy only applies to YLS Accelerated Integrated JD-MBA students and not to any other joint degree programs.

### Post Law Enrollment:

Graduates opting to pursue their educational enrollment beyond their YLS degree must meet the COAP eligibility requirements of loans in repayment to receive support. Loan repayment status will depend on the enrollment status at the post-law institution.

- Effective January 1, 2024, up to five years of interest accrued on law school loans will be COAP eligible if the participant is continuing a PhD program started prior to graduation from YLS or enters a PhD program within two years of graduation from YLS. Students who are termed enrolled halftime or more are eligible for "in-school deferment" of their loans and will automatically be placed in this status by their loan servicer(s). Under this status, where no payment is required, loans do not meet the COAP eligibility requirement of being formally "in repayment."
- Students who are termed "less than half-time" will have loans in repayment and, as such, may be considered for COAP support if they have viable employment.

Note that each institution terms enrollment differently based on its own policies (i.e., a PhD program where all years of study both in residence and in dissertation are considered fully enrolled vs. a PhD program where only the years of residency are considered full time enrolled while the dissertation years are less than half-time). As such loan repayment status will fluctuate based on the enrollment status reported by the institution's Registrar to the National Student Clearinghouse.

### **Transfer Students:**

Students who transfer into YLS for the 2L year are eligible to have one year of need-based loans from their prior educational institution included in their COAP-eligible loan balance.

### **Employment Variations:**

#### **Part-Time Employment:**

A participant solely working in a part-time position will be eligible for COAP if he/she can prove that he/she is earning a living wage sufficient to provide the necessities and comforts essential to an acceptable standard of living. However, for the COAP calculation, his/her income contribution will be based on an imputed full-time salary based on the higher of 1) a 35-hour full-time work week or 2) the definition of full-time employment hours as established by your employer. (Example- if COAP participant is working 20 hours a week at \$300 per week, COAP will impute the hourly wage (\$15/hour) X 35 hours = \$525 X 52 weeks = \$27,300 annual income.)

If the participant is working two or more part-time positions equaling a full-time work week (35 hours or more) then the actual annual income of all positions will be used to calculate COAP income.

#### **Maternity Leave:**

Current COAP participants may take up to six months of maternity/paternity leave for the birth or adoption of each child. To be eligible, the participant must have received COAP benefits in the COAP cycle immediately prior to the maternity/paternity leave. If the participant is receiving paid maternity/paternity leave from the employer, the COAP income will be based on actual employer compensation. If on unpaid leave, the COAP employment income will be calculated as "zero."

#### **Unemployment:**

Current COAP participants may take up to three months of unemployment leave per COAP year while continuing to receive COAP support. For those periods of unemployment, if the participant is receiving any type of compensation (severance or unemployment benefits), the COAP income will reflect those benefits. If the participant is receiving no unemployment compensation, the COAP employment income will be calculated at "zero".

#### **Employment Change Mid Cycle:**

If employment changes mid-COAP cycle after an award has already been made, it is the responsibility of the participant to both: 1) update his/her application on the COAP system via the "submit status change" function and 2) notifying the Financial Aid Office directly of this change.

#### **Fellowships:**

A fellowship for which the participant is monetarily compensated is considered viable COAP employment. However, participants should pay special attention to the taxability of these Fellowships, as referenced in the chart below:

<b>Employed by:</b>	<b>COAP issued as a non-taxable forgivable loan</b>	<b>COAP award will reported as misc. income to IRS via a 1099</b>
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		Form
501(c)3 agency (other than Yale)	✓	
Yale (even if performing services for another agency/institution but paid by Yale or an Yale payroll)		✓
Federal government agency	✓	
Federal government agency through IPA agreement with Yale		✓
Non Federal government agency	✓	
Non 501(c)3 institution in U.S.		✓
International Agency (NGO, intergovernmental agency, foreign charities etc.) WITH U.S. 501(C)3 status	✓	
International Agency WITHOUT U.S. 501(c)3 status		✓

**COAP Contact Information:**

Graduates seeking COAP support are encouraged to contact the Financial Aid Office with any questions on the COAP application and award process or on their personal circumstances:

Yale Law School Financial Aid  
P.O. Box 208215, New Haven, CT 06511  
Financialaid.law@yale.edu  
203-432-1688 (phone)  
203-777-6138 (COAP specific Fax line)

Further information on COAP and loan repayment may be found on the YLS Financial Aid Website at [http://www.law.yale.edu/admissions/finaid\\_repayment.htm](http://www.law.yale.edu/admissions/finaid_repayment.htm) .

**APPENDIX**

**I. COAP Application**

**II. COAP Award Letter**