Justin Draeger: Hey, everyone, welcome to a special edition of “Off the Cuff.” I’m Justin Draeger.

Megan Coval: I'm Megan Coval with our policy team.

Karen McCarthy: I am Karen McCarthy also with our policy team.

Jill Desjean: And I'm Jill Desjean also with the policy team.

Justin Draeger: All right, welcome everybody. We are doing another special edition just to try to answer all of the questions that we have coming into the association via AskRegs and our policy team and from all the chatter we’re seeing on the various LISTSERV. So let's dig into a couple of different things today. I think we should talk about student eligibility, we should talk about eligible use of funds, and then maybe just do a quick overview on receiving those funds and then reporting in any outstanding issues. We're going to try to get through as much as we can. So let's dig right in and first talk about student eligibility.

Jill Desjean: Yeah, so this portion of the higher education emergency relief funds are only permitted to cover a student's expenses related to the disruption of campus operations due to the Coronavirus. So this is distinct from a student's need. This is for expenses, like if a student needs to buy a computer because their courses are being moved online, if they need to fly to their parent's home because the dorm closed. Those are the sorts of things that these funds are meant to include. They really don't factor need in, aside from the guidance that the department has given us on the 9th of April, when they sent out that agreement and certification form, just sort of giving institutions some suggestions about in what order they might want to award the funds and how much they want to give to students. But the need piece is separate from the what is eligible for these funds to cover.

Justin Draeger: Right. So Jill, let me just ask questions. So it feels like the water's a bit muddy because the department is saying we hope that you'll do some ranking based on
need, but this is not about need. This is about covering these expenses that have been identified in the Cares Act.

Jill Desjean: Right. So two people might have the same expense, but if one is needier than the other one, you might want to prioritize the needy student to cover the same expense over the one who was [crosstalk 00:02:43]

Justin Draeger: And when we talked to schools yesterday, they were sort of creating categories of students, which I think is probably a smart thing to do. They were looking... Like one category of students or people who were displaced from the campus housing, they clearly have expenses. And then there might be international students or things... So they're creating categories to try to address that.

Justin Draeger: What about the other common question I'm seeing a lot is non-Title IV recipients, are they eligible for these monies?

Jill Desjean: Yeah, there is no prohibition in here saying that... It's not Title IV aid. We know that. And there's nothing saying that non-Title IV eligible students cannot have it. So the assumption is that they can.

Justin Draeger: So if I'm a school, I'm thinking through, I don't have an application from all of these non-Title IV students, I don't have a FAFSA. What can a school do, then, to try to look at all these non-Title IV recipients?

Jill Desjean: I assume, and you may know better from having talked to other schools, that they're probably going to create some sort of a form or online... Hopefully online, to be able to find out from students what their needs are.

Justin Draeger: Yeah. So they could create a separate institutional application. It could be very brief. The schools we talked to yesterday ranged from, we already have an institutional application for institutional aid, to we are going to create one. It's going to be very basic that says, do you have any of these expenses related to COVID-19, check the following that apply. And it's literally going to be a list with other. So it could be something as simple as that, the school's just making sure they have one of these qualified expenses.

Justin Draeger: One question that I feel like has been thrown into a bit of a tailspin recently is DACA. So where are we at with DACA students?

Jill Desjean: Well, we do know that they're not specifically excluded in the legislation. Nowhere does it say that these funds can't go to undocumented students. But what might be reassuring and what isn't there, would be if they said that it could go to those students. And it doesn't say. So ED certification form requires the institutions agree to award these funds consistent with all applicable laws. That is vague. All laws is a lot. Maybe it's not vague, but it's broad. All laws are a lot of laws. And we saw today that Inside Higher Education was reporting that DACA students might not be eligible for this funding.
Justin Draeger: Yeah, so the question is there's some law, what was that, from 1996? Is that one the law that talked about to receive public benefits, broadly speaking, you have to meet these qualifications, and documentation of citizenship was one of them?

Jill Desjean: Yeah. The I think they're referring to, the IHE article just refers to a law from the '90s that bands federal benefits from going to undocumented individuals. I think it's the 1996 welfare reform law, that was sort of what made the most sense to me. And that does specifically prohibit undocumented individuals from getting federal benefits. And it's got a pretty broad definition of federal benefits. Talks about federal grants, talks about not just specific programs like TANF or SSI or things like that. It's a wide definition.

Justin Draeger: So a couple things about this. One is I sort of feel like years and years and years of distrust between schools and the Department of Education are coming to a head because while this law gives wide flexibility for schools to award these funds to students, who aren't Title IV students, necessarily, don't meet student eligibility requirements. The sense I'm getting from schools is they just feel this immense amount of, am I going to get screwed in an audit or a program review in a year or two? And I really feel like this is more of a sign of our culture that's developed between the community and the Department of Education than anything else. So when you go and talk to the Hill, some Hill staffers are saying, no, undocumented students would be fine, but then we go back to this law that's sort of broad and then the all... What did you say that verbiage is in the certification, all applicable laws?

Jill Desjean: All applicable laws. Yeah.

Justin Draeger: How in the hell is anybody supposed to go through decades of laws to find out where they may or may not be crossing the line? And this is where trust would be important. So if I'm a school and I'm thinking about DACA students, I guess my best advice right now, because the can of worms have been opened, the worms are now out. And I would say maybe plan for it, but maybe not disperse because now the department has been put on the spot and asked specifically are DACA students included or excluded?

Justin Draeger: And I have to say, I feel very dispirited having to say this today, that we've reached this point where now we've put the department into a corner. To frame it a different way, we as a community now have asked the Trump administration if we can pay undocumented students. Let that set in for a second. Think about what the answer might be. This is the administration that's trying to rescind DACA in court.

Justin Draeger: So I feel very dispirited by all of that. But that said, this is now what I thought was clear because there was no prohibition, now we're moving into the uncertain category. Let's talk about international students. Are they able to receive funds?
Jill Desjean: They should be. They’re not prohibited.

Justin Draeger: Yeah. And the other thing we looked at, we had our researcher Charlotte Etier pull the methodology and look at what was included in the calculation for these funds because schools don’t know who is documented or undocumented unless they purposefully are collecting that information. International students, undocumented students, these all make up the FTE count that went into the calculation about distribution of funds for the school.

Justin Draeger: So I’ll just point out the nonsensical nature of the fact with DACA again, that you could have received funding specifically for those students, and now on the table is a prohibition against paying those students. So anyway, international students do qualify.

Justin Draeger: Jill, do we know, what about students who aren’t pursuing a degree or credential, like they’re doing career training on campus?

Jill Desjean: Yeah. Again, there’s not a restriction on those students. So I guess we have to assume that it doesn’t have to be students who are enrolled in degree programs.

Justin Draeger: What about new students versus returning students? So it talks specifically in the certification form about operational disruptions, but if you’re a new student, I think schools are asking, well, have you experienced the disruption?

Jill Desjean: Right. It’s disruptions related specifically to the disruption of campus operations. And so if you weren’t on the campus, I think it would be harder to justify that you had an expense related to that.

Justin Draeger: So let’s say I’m a new student coming in, and let’s say that whether campus will be open in the fall is uncertain, and that’s leading me to expend monies in some way that I hadn’t planned to. I don’t know what it is, but let’s say I have to think about moving expenses or purchasing new technology because I might be online completely in the fall. Or whatever it is, just because of the uncertainty that exists there. Would uncertainty, you think, justify an operational disruption?

Jill Desjean: I don’t know about uncertainty. One that I could think of more is when you start thinking about nontraditional calendars, someone who might be a new student who starting next week. I could believe that they might be affected by the disruption of campus operations because it’s such an immediate thing. They might’ve had a plan, I’m going to campus, I’m going to do this thing, and now because of the changes on campus, their circumstances have changed.

Justin Draeger: So what if you held back a portion of the funds, and this maybe, Karen, gets a little bit into allowable use of the funds, but let’s say the schools we heard from yesterday were planning on spending the large bulk of their money now, and then I think they were going to hold a little bit back for the fall as we got in to
see what sort of disruptions might exist there. If you have new students coming on to campus in late summer or fall, who might experience uncertainty or disruption, would it be an allowable use of funds?

Jill Desjean: Maybe.

Justin Draeger: Okay. Karen?

Karen McCarthy: I would say yes.

Jill Desjean: Okay.

Karen McCarthy: Yeah, I would say as long as you could justify it, and I would absolutely document how you are justifying that it is an expense related to the disruption. I think that would be okay.

Justin Draeger: Yeah, so I think what we're even seeing here is if there is no specific guidance relative to new students versus returning students. And the thing that I... We had a NASFAA board meeting yesterday. And during that board meeting we talked about two types of risk that schools have to consult. Because what was the phrase that you used this morning, Karen? Something about the birdcage and whether people... The birdcage is open, but whether people feel comfortable actually leaving the birdcage.

Karen McCarthy: Yes. I know there's some... I meant to Google this. There's some saying that's in the back of my mind, and I can't think of it right now, but it's like that we're so used to being inside this cage, and now that the door is open, and we're all still staying in the cage and don't feel free. And I can't think of the saying right off the top of my head.

Justin Draeger: Okay.

Karen McCarthy: But I feel like that's the position that schools are in right now.

Justin Draeger: Right. Because schools are used to living within confines that are well defined within federal regulation guidance. So right now, this is purposefully, excuse me, purposefully flexible, but that's creating a lot of uncertainty and risk. And so the two risks I look at are legal and fiscal risk. So am I putting myself or my school in jeopardy by making a certain decision?

Justin Draeger: The other one though is reputational risk. And the intent of these funds is to get money out as soon as possible. And so a lot of the things we're talking about either are fiscal risk, is it covered, is it specified, or reputational risk. Have I given the money out in a fair and equitable way, in a timely way that I'm not going to be held up as an example of, boy, this school did it right and this school did it wrong.
Justin Draeger: So those are the two risks that constantly have to be measured as schools move through this. So in this very point about new or returning students, there's the fiscal legal issue, but there's also the how do we deploy these funds in the best way to help students, and that's going to have to be made on a campus by campus basis, I think, in some of these cases. All right.

Karen McCarthy: I can add, I was thinking about the reputational risk last night and I was fearful that when you think about risk to your reputation, if you set up your process in a way that presents too many hurdles for students, I can just envision new stories down the line that say, post-secondary institutions got seven billion dollars in funds that are supposed to go directly to students. Students can't access these funds. That just is optically a very bad look.

Justin Draeger: Right. That's the reputational harm. It's like you had money, you were supposed to get it to students. And for schools, they might feel like they're in a no win, but they're really just at this nexus. They're at a nexus of balancing what might be impossible, but they have to do their best and think about, I'm going to take the legal risk because it's the right thing to do for students, and obviously presidents are going to have to be involved in that. And we need presidents and administrations with backbones who are willing to carry risk because there's no way you can move forward in a timely way with all of this and not be comfortable with some risk. That's sort of the environment we're living in. You could just sit on the funds and hope in six months that we have answers to every single question, but I don't think reputationally that that helps you or helps your students.

Justin Draeger: All right, let's keep moving to how schools can use the funds. Karen, we've probably talked about this ad nauseum, but I want to talk about the school reimbursing itself for just a second. And related to this question, I would say this is the most frequent question that I've seen, is can these funds be used to offset tuition and fees? So what's the answer?

Karen McCarthy: In the certification statement that the school signs, it is pretty explicit that the school can't use these funds. These funds that are set aside for direct aid to students, cannot use those funds to reimburse itself for any costs or expenses. We are taking that to be anything that any refunds that you may have provided in the past or any future expenses, you cannot be using that to reimburse yourself as the institution.

Justin Draeger: So I had a conversation with an aid director last night who was not necessarily taking issue but questions, like tuition and fees are not excluded anywhere in the certification form or in the secretary's letter. So can't they be used for tuition and fees? That was the question.

Karen McCarthy: I would say that that is probably not Congressional intent. I do think because this is supposed to be aid that goes directly into students' hands to cover their expenses related to the disruption, that tuition and fees probably do not qualify. My concern, and we haven't chatted about this offline at all, my concern with
tuition and fees also is partly that there can be a perceived perverse incentive there that the institution is assessing these charges to the students, and this money that's supposed to go directly to the students, in fact, goes through the student back to the institution. That's not the congressional intent of this particular pot of funds.

Justin Draeger: So this aid director, for example, was saying, well, for all of our students that come online, which is everybody at their school now, there is a technology online assessment fee. And he's saying that is a legitimate expense that students will have, and can this be used to cover that? And I think what we would say is, all money is fungible. So if a student chooses to give you money to cover that fee, then that would be the student's choice. That's very different than the necessarily Title IV funds, where the default is pay off the charges at the school first, and then you get what's left.

Justin Draeger: So I guess then the question naturally is well, if I'm going to cut a check to a student and that student is going to cut it right back to me, what is the point? Isn't that just another barrier? So I guess we're living in this sort of no man's land of could a school say this is how much you are getting in your emergency stabilization fund, grant. That money will come to you. If you would like us to apply it to something, you need to affirmatively tell us that's how you want to use the funds. Could a school do that?

Karen McCarthy: Yeah. We are thinking that that probably would be allowable. We don't have any explicit blessing from the department, but something like that protects the student, in that the default way is that it goes directly to the student unless the student chooses otherwise. And by having the student be able to opt in in that way, you prevent the situations where the money goes to the student, and then the student says, "But wait, I still owe you money," or "I would like to this for my summer enrollment instead, can you just hang onto this and not send me this?" So we think that that is a kind of a reasonable middle ground approach.

Justin Draeger: Okay. And again, we don't have guidance. We don't know if there will be guidance around this, but we do know is the intent here was not for schools to reimburse themselves. There's this whole other half of the emergency stabilization fund that can be used for things like shoring up your technology, covering operational expenses, and nothing prohibits the second half also from being used to pay off student accounts. Right?

Karen McCarthy: Right.

Justin Draeger: Yeah. So that's another tranche of money that just hasn't been made available to schools yet but could and could pay off student accounts with that.

Karen McCarthy: Right.
Justin Draeger: Okay. Let me talk about allowable uses a little bit more and ask... Another question I see a lot of is do these funds have to be used to meet elements of a student's cost of attendance?

Karen McCarthy: We are thinking no, that they are expenses... There's a little bit of conflicting language between what's in the Cares Act and what is in the documents that schools are signing in a letter from the secretary. We do actually have a question into the department to confirm this, but we are thinking no, that it is any expenses that are related to the disruption on the campus. And one of the reasons that we're thinking no, is that some of the examples that they provided are not explicit expenses that are in the cost of attendance. So they listed things like healthcare, and healthcare generically isn't part of the cost of attendance, so we think there's a lot of flexibility there.

Justin Draeger: In the certification form, it also talked confusingly, to me at least, about using professional judgment related to these funds. Can you expand on what is happening here with the professional judgment piece in the certification form?

Karen McCarthy: Yeah, there is definitely some confusing language there. We also have a question in to Ed about this because it encourages institutions to use PJ so that this particular type of emergency aid is not factored into the student's financial aid package. However, previously, in the announcement from April 3rd, the department excluded any aid that's received by a federal entity from being considered as EFA or income on the FAFSA. So our understanding, based on that electronic announcement, is you don't have to do any of that. You don't have to be adjusting cost of attendance to make room for this at all. So we do have that question in there because we thought that this was not, that you did not have to do PJ in this context of awarding this emergency aid at all.

Justin Draeger: So just to be clear, if I have a student who, for example, has maxed out all their aid that needs full cost of attendance, I wouldn't have to adjust upward because this is not considered EFA.

Karen McCarthy: That was our understanding, and that's why that PJ text in the documents from the secretary are a little bit confused.

Justin Draeger: Yeah, and the April 3rd guidance it says any emergency aid from a federal or state entity is not considered EFA. And then for schools, public schools that are wondering, public schools... We did get an answer from the department on this. Public schools are not considered a state entity.

Karen McCarthy: Yes, that's correct.

Justin Draeger: Okay.

Karen McCarthy: So any institutional aid that comes from a public school would not fall under that exclusion, is the kind of the next step of that.
Justin Draeger: Let me go back to... This probably crosses over yours and Jill’s area, but if a school is looking to award funds to some students or all students, some of this might have to do with their own processing on capacity and bandwidth on campus, but is there anything that would prohibit the school from saying we are going to award these funds to all students?

Karen McCarthy: When I was reading through all the documents that the department posted this morning, I saw that the secretary explicitly mentions in her letter that the school might choose to award to all students, but then also talks about being able to document the expense or the need. It’s all very confusing language there, but our opinion is that yes, the school could do groups of students where you don’t have an application, but you’ve identified a group of students that you know are affected, and do awarding to that group of students. You could also do across all students, if you feel that all of your institutions or all of your students were impacted in some way, I think you just need to be able to justify what it is that you’re doing.

Jill Desjean: Yeah, no, I agree with you 100%. If the secretary didn't specifically say in that letter, didn’t include all students, I would probably lean against that. But the fact that that language is in there clearly makes you think that that's okay. And so it really just comes down to that justification of how do you say every single student has an expense. But if you can find a justifiable way to say that, it seems like that's allowed.

Justin Draeger: Let me turn for just a second to... Because we’re talking about the justification and how the school develops its policies. Let's talk about the reporting for just a minute because having the end in mind might help some schools in thinking through how they’re going to do this. So Megan, can you kick us off and talk a little bit about the reporting requirements around these grants?

Megan Coval: Yeah. So there's sort of a series of reporting requirements. The first one is that you have to report 30 days from the date of a signed agreement, and then you have to report 45 days thereafter. And the information that you have to report, and this was all stated in the certification agreement, is how the grants were distributed to the students, the amount of each grant awarded to each student. So we’re talking about documenting each individual student there and the amount that they received. The way you went about calculating the grant, and then any instructions that were given to the students about the grant. So anything that came along with it.

Justin Draeger: Let me ask a question about the student piece. So they have to do how grants were distributed to students. Based on... If we're using as a rough template something that other schools have had to do when there are localized natural disasters... These are schools we’ve talked to in Florida who've done something similar when they had to get disaster relief funds and then distribute them and then report back. If we're using them as a template, what they've said is that they had to provide an overall narrative about what they were doing, what their policies and procedures were, and then they had to report on a student by
student basis the amount that each student got. But they never handed over to
the federal government personally identifiable information about each student.

Justin Draeger: So Francisco [inaudible 00:24:24] had said yesterday that when they do disaster
relief reporting back to grants.gov, that what they do is they put in the student
identifier, but that’s it. There’s no identifiable information passed along to the
Feds. So I guess I’m wondering, do we think it’s safe to say that that’s what this
will be? There’s nothing that says that it will be personally identifiable student
information that’s being given back to the feds.

Megan Coval: Yeah, that’s how I interpret it because there’s no, like you said, no requirement
there that it has to be personally identifiable. So student ID number, some other
generic way. Student A, student B. Karen, Jill, I don’t know if you have any other
thoughts on that, but given the lack of specificity in the certification agreement,
I think so.

Justin Draeger: The other thing I guess that I wonder about reporting is, when they sign the
certification form, there’s also something in there that talks about that, to the
extent... I guess they say to the greatest extent practicable. That’s the language.
That the school has to continue to pay all of its employees and contractors
during these periods of closures and disrupt disruptions. So presumably, I don’t
know if they’ll have to report numbers that show that or if they’ll just have to
certify that that’s what they’ve done. But I guess the question is, from a school
standpoint, does that mean they have to maintain the same number of
expenditures for payroll or FTE count or something like that related to
employees?

Megan Coval: I would say that the phrase that you mentioned, to the greatest extent
practicable, is a nod or acknowledgement from the department, and that it's
unlikely that you know you will have everyone on payroll that you had before
the crisis, and that it’s probably natural that you may end up losing some folks
and that gives you some flexibility there, I think.

Justin Draeger: Yeah, this is what the department wants, but when I looked at the Cares Act
stabilization fund criteria, this was not in there, was it? There was nothing about
schools and students only getting [crosstalk 00:26:25] schools didn't have a
reduction in force.

Megan Coval: I think it's just they're looking for a good faith effort from schools to try to...

Justin Draeger: Right. This is a want, not a requirement. It's certainly not in the law. And nobody
wants a reduction in force, of course, and I'm sure schools will be doing
whatever they can in that regard, but that the purpose of this money is
emergency grants to students. So I think most schools have probably... are
navigating the process about actually getting their money. So Jill, what are we
saying? What's the process here? Are schools getting hung up or are they
going through?
Jill Desjean: Yeah, I think for schools that already had a grants.gov account, I think that they were familiar with that site and had all the setup done, and they were able to get through it pretty easily. But for schools that didn't, I think they did have some hang-ups. So the department did put up on their Cares webpage some specific instructions about how to navigate that site with, I believe there are screenshots in there, so hopefully that is going to be a little bit more helpful. Because it's not quite as straightforward as create an account and submit your application. There are definitely some steps that are not super intuitive.

Justin Draeger: So I'm not aware of any schools that have actually received their funding yet. So I'll just put out there, if any school has actually received their funding or when you do, I would certainly welcome a note directly to me or to policy@nasfaa.org, just so we know when the funds are actually being dispersed. At time of this taping, I haven't heard of any schools that have received it. Yeah, on a stakeholder's call last week, I think they said as early as Wednesday.

Jill Desjean: We should also note the amount, if people haven't filled out their form yet, that was a question that was coming up a lot. Should we put the 100% of the allocation [crosstalk 00:28:06] institutional piece and the student piece or-

Justin Draeger: What's the answer to that?

Jill Desjean: It's the 50%, just the direct to student funds on this piece, and then the department is going to shortly issue guidance on how institutions will submit their certifications for the institutional half, and that's where they will request the institutional half of the funds.

Justin Draeger: Okay. Karen, what things that are sort of outstanding that we don't have answers or clarity on just yet?

Karen McCarthy: Well, one piece, it's not necessarily an outstanding issue, but one thing that I have heard some school chatter about, in terms of setting up your processes at your institution, is a question about whether or not the financial aid office even needs to be involved in this process at all. And I think the answer to that question is no, they do not. Because it's not Title IV aid. You're not using any of the Title IV aid need calculations.

Karen McCarthy: If there is a different office at your institution that might be better to review, if you're doing an application process, it might be better at identifying need. An example that I heard was that you might already have an emergency grant program that's run through a different office at your institution, and so they're more familiar with these types of needs as they come up, that it would be perfectly acceptable for a different office at your institution to do the awarding of these funds.
Karen McCarthy: And then obviously your business office will likely be involved in terms of getting the funds right out to the students. Somebody at your institution has to do the reporting back to the departments, but none of this is placed... This is an institutional grant. None of this is placed solely on the shoulders of the financial aid office. So if there is a more appropriate office, then take it and run, I would say.

Justin Draeger: Yeah. When we were talking to schools yesterday, Karen, my sense was is that there was a pretty good split. First of all, only one school that we talked to out of the dozens, was the financial aid office hardly involved at all. Most had some involvement. But it was pretty well split between schools that said, the financial aid office is here as an advisor, but it's going to go right through student accounts, not be charged against any institutional charges, and then be issued as a refund to the students that are identified. Other schools, colleges on campus in the university were clamoring for some of that money to help students that faculty knew were facing some emergency situations. So there's wide latitude here, and schools have to work out that process with their leadership.

Karen McCarthy: Yeah. And the other thing is that if it's not considered EFA, the aid office technically doesn't need to know about it at all because they don't have the fact... They don't have to log this as part of the package and doing any kinds of adjustments. None of that is a factor like it is for other types of aid, where the aid office needs to be notified so that they can make all of their packaging adjustments.

Justin Draeger: Yeah. Boom. Let that sit in for just a second. So if the aid office isn't awarding, and the aid office isn't reporting because that could conceivably be done by the grants office or whoever else on campus is taking care of that, the business office. Yeah. The aid office wouldn't even necessarily have to keep track.

Justin Draeger: So Megan, I think one of the bigger outstanding questions is that this is 50% of the aid that they're getting through stabilization. When is the other 50% going to be coming to the school, which as we said, can be used for operational support, emergency spending by the campus, application of student accounts. When is that coming?

Megan Coval: Yeah. Yeah. Like you said, it'll be much more flexible, and we've heard on record the secretary say in coming days and within two weeks. So I would say in the very near future we can expect that.

Justin Draeger: Okay. So we'll keep our eyes and open and ears to the ground, and when we see or hear something, we'll make sure all the members are aware of that.

Justin Draeger: So we are having a webinar this Friday at two o'clock. It'll be live, and so we will be answering questions and answers, running through some of the latest Department of Ed guidance, and covering, of course, the Cares Act. So people
want to tune in for that. That is, as all of our COVID-related coverage right now, it is being made open and public. So folks should tune in.

Justin Draeger: Stay close to today's news, where we're publishing AskRegs questions related to COVID-19 and ED and guidance on a daily basis. And send us your comments. Remember to subscribe and tell a friend. These are, I think, hopefully really useful podcasts for folks as they are trying to navigate all of this on campus. So please share liberally. Thanks, everybody, for joining us for another edition of “Off the Cuff.” We'll talk to you again soon.