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Justin Draeger: Hey, everyone, welcome to another edition of “Off The Cuff.” I’m Justin Draeger.

Allie Arcese: I’m Allie Arcese with our communications team.

Megan Coval: Megan Coval with our policy team.

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

Justin Draeger: Welcome back everyone. We’re going to get into all sorts of CARES Act stuff today, including the latest guidance from the Department of Education. It feels like we’ve been in a never-ending week, for me, for several weeks in a row, just one very big long week. But, I wanted to point something out. You all know, well Megan I know you know George Stephanopoulos.

Megan Coval: Yeah.

Justin Draeger: Aren’t you a GMA? You’ve seen him in person right, around town? I feel like we have stories of you running into him.

Megan Coval: Well, I haven’t seen him, but I love him. I love his wife. I’m a big fan of the whole Stephanopoulos family.

Justin Draeger: I don’t know, who is he married to? Is it someone I actually know?

Megan Coval: Oh, Ali Wentworth. She’s a comedian.

Justin Draeger: Really?

Megan Coval: She’s written two or three really funny books. And an actress too, I think. She’s awesome.

Justin Draeger: So he posted on Twitter that he had a COVID antibody test. And he has the COVID antibodies, which means at one time he was exposed, he had it and his body developed the antibodies, but he was asymptomatic. He never had symptoms. And he was apologizing. And then he said, "I’m sorry for anybody that I infected, I didn’t know." And then he was donating his plasma, where they take your blood and they spin it, get the plasma out, to do antibody therapy for other people.
Justin Draeger: So this got me thinking, this is different than, do I have COVID-19? That's not this test. This test is whether you have the antibodies, which means you may have had it. So I looked it up and there are labs in the DC area where you can go get tested to see if you have the antibodies in your body, you've already been exposed. So I, of course, signed up for one immediately because I'm a hypochondriac and I have ... Knowing that there's the test that tells me I could have had it, I can't leave that alone. Do you see what I'm saying?

Allie Arcese: That does not surprise me at all.

Justin Draeger: About me or just that-

Allie Arcese: Yeah.

Justin Draeger: Right. So-

Allie Arcese: I mean, this is coming from the guy who bought, what was it, a gallon jug of hand sanitizer for our office holiday party.

Justin Draeger: Two actually. But yes. And I think my jugs are replenishing all of the office hand sanitizer because I don't think we can buy it.

Allie Arcese: Yeah, we laughed before.

Justin Draeger: Yeah. Now I'm laughing.

Allie Arcese: But we were wrong.

Megan Coval: Now here's my question though. Is this a ticket to ride then? So let's just say you go and you're like, "Hey, I had the antibody." Is it like the flu where you could get it again?

Justin Draeger: Well, so here's my take. And Jill, you're married to a doctor, so obviously we're going to defer to you on all this.

Allie Arcese: Jill's like, "Please don't."

Justin Draeger: Jill is our medical source. So Megan, I feel like the scientific community never says anything definitively. They just don't talk in definitives. In fact, yesterday CNN had a, did you see this, CNN had a screen of the two, it says it's like, Trump ...

Allie Arcese: Hoping we will not be here in the fall.

Justin Draeger: And then right below it was a caption, Fauci, we will definitely not be open back to normal in the fall. So anyway, I feel like the scientific, they never talk in definitives but if it behaves like the ... So they'll never say like, "Yes, once you've
got it, you've got it." I mean, I don't think they'll ever say that, but I feel like what they're saying is, if you've got the antibodies then you've have some immunity because you already had it. And I do feel like this does create better or worse, if you've got the antibodies and you've had it, you're walking around free and clear.

Allie Arcese: Well I think the question that they've been talking about though is, how long that immunity lasts? Is it two weeks, two months, six months? They don't know.

Justin Draeger: Yeah. And flu viruses always mutate and change between seasons. But I don't know, my wife keeps saying, "You're going to be devastated when you get this back and you have no antibodies."

Allie Arcese: Probably.

Justin Draeger: Because in my mind I'm like, "Oh, I must be like George Stephanopoulos. I probably had it, I was asymptomatic and I'm good to go."

Megan Coval: His wife had it.

Justin Draeger: Really?

Megan Coval: Allie had it. Yeah, she was in, because I was GMA I was watching and she was in bed for 10 days.

Justin Draeger: Oh my gosh. Well this is obviously very serious. I don't know if you guys just saw this, but Elizabeth Warren's brother just died of COVID related causes. Yeah, just breaking today.

Megan Coval: Oh, gosh.

Allie Arcese: Her oldest brother died from coronavirus.

Justin Draeger: So obviously touching a lot of people and still disrupting most of society, including higher education. I feel like we should just jump right into it because we have a lot to talk about today. First thing I want to clarify is, Jill and I did a quick take on the guidance the Department of Education released on Tuesday. We taped that Tuesday afternoon. And we were specifically talking about the emergency grants for students. Jill, do you want to elaborate on that?

Jill Desjean: It was really confusing because the department both announced the institutional share, released an FAQ on the institutional share, but then also released an FAQ on the students share that had been announced two weeks before, so it was really confusing to parse out. We understood but we may not have communicated as well, which pieces were related to specifically the student share versus which pieces were related specifically to the institutional share.
Justin Draeger: The majority of the conversation we had, was the student share of the emergency-

Jill Desjean: Yeah. The big shock was about the Title IV eligibility piece and the implications for DACA. So that was really where we're focused. But I think we did pepper it with the fact that the institutional share funds were released that day and then an FAQ related to that was also released.

Justin Draeger: So in the name of ... We'll circle back around to the students share. So there are two different shares and both certification agreement forms are out. So Megan, we just did an article this morning on the institutional share. Can you talk briefly about that?

Megan Coval: Yeah, so the institutional share, the guidance that came out around that was announced on Tuesday and that will be $6 billion total. So again, half of the total fund that went to institutions. And by and large, this is much more flexible for institutions in terms of how they can spend it. The broad stipulation is that it has to go directly to be spent on expenses that were incurred as a result of changes in the instructional delivery. So the fact that you had to close campus and send students home and anything related to getting everything up and running online, that type of thing.

Justin Draeger: All right, so Megan, let me ask a question about that before we get back to the student share. On the institutional share, we had talked previously about this idea that schools should be drawing up their plans because when this came through, they might need to use them or could use them or make the case internally to use them for things, like them having to go to 100% telework or moving online. Is that still a valid use within these funds?

Megan Coval: Yes, there are some restrictions, but for the most part there's pretty wide latitude in terms of filling in for lost revenue or operational costs or salaries. Not all salaries, some are restricted. So I would think that those types of things would still be allowable uses.

Justin Draeger: Right. So if everybody had to move online and there were technology upgrades associated with that, that appears to fall within the department's guidance.

Megan Coval: Yep. And the other thing with these funds, is you can use them for the institution to reimburse themselves for refunds that they provided to students, for room, board, if they got laptops for students or helped with internet connectivity. So you can't do that with the student portion, but it specifically states that you can do that with these institutional funds.

Justin Draeger: Okay. So that's out of the second tranche of funds and schools have to submit a separate certification and agreement form through grants.gov to receive the second portion.
Megan Coval: Yep, that's right. And similar to the first that states that they should, well this part is different, to the greatest extent practicable, spend these funds within a year. The student piece does not have that, to the greatest extent language, but so there's still flexibility on when they can be spent. And the other thing in here that they say and encourage, is for institutions to give some of this money in the form of emergency grants to students. So they're basically saying, "Hey, you don't have to spend this on yourself. In fact, we'd encourage you to spend this on students." And if you do that, if an institution chooses to do that, they do have to make sure that they follow the requirements that are applicable for the student portion.

Allie Arcese: Yeah. And on that note, there was, I think, some confusion earlier this week and many of us have seen that in the last couple of days, institutions like Harvard, Stanford, Yale, Princeton, have actually been saying that they're going to reject all of the funding from the CARES Act. And part of that stems from, I think, it was back on maybe Monday or Tuesday, earlier this week, President Trump in a press conference was criticizing Harvard for accepting funds from the CARES Act. And it's understandable, there's so many different funds that come out of this bill and I think outside of the bubble of higher education, people don't know that there was a separate fund just for higher education. So I think there was some confusion and folks thought that Harvard was taking money that was intended to be set aside for small businesses.

Justin Draeger: Yeah, they were talking about this as like the paycheck protection program.

Allie Arcese: Yeah. And so, this snowballed, and Harvard came out and actually said, "We're going to accept the money and we would use 100% of it for students." So, the student share and the institutional share just on emergency grant aid. But then Secretary Devos, I think, was also putting pressure on wealthier schools that have large endowments and things like that, to not take the funding and leave it to be redistributed to other schools. So that's why we're seeing some schools just not take any of the money, which, I don't know, it's interesting. I'm saying it takes on both sides of that because it's unclear right now how the money would be redistributed or if it would be redistributed.

Justin Draeger: I thought it said that they, didn't it say that they could just give the money to another school?

Allie Arcese: Yeah. So that's the other thing. It's like should Harvard for example, just take it and then cut a check to a community college in the area or just not take it at all and let the department handle it? And it sounded like the department, I think, believes that they can do that, but it's still unclear exactly how that would happen. So I think again, this goes back to, is this just going to cause a delay in the funds?

Justin Draeger: Yes. I will say, in one of my tweets this last week, somebody jumped in and started complaining about Harvard taking small business loans and there was so much wrong with that tweet that I couldn't even respond to it. So I just moved
on. But they're talking about the CARES Act funds that we've been talking about, this first tranche, second tranche. and so they're going to forego, so great for them. We don't know how exactly they forego, where the money goes, how it gets distributed to other schools. No idea.

Megan Coval: I was just going to say, I think what is bothersome to me about the whole thing, is the way that it just gets portrayed because I feel Congress didn't say these schools couldn't have these funds and Congress established an allocation formula that gave every institution funds. And everything I've read says, "Well Harvard shouldn't apply and Yale shouldn't apply." And I feel like the language, apply, is very misleading.

Allie Arcese: I think I understand the confusion for sure. And again, as you get further and further into the weeds, a lot of people probably don't know that there is an institutional share and a student share. So maybe it's coming off as they're applying for funds to just take care of themselves and it overlooks the fact that there are low-income students at Stanford and at Yale.

Justin Draeger: Yeah, I think it just all got wrapped up in the same because it was also this week, although not necessarily directly applicable to this, that a lot of small businesses went unfunded while banks were passing out monies for small businesses to publicly traded companies who made up large accounts at their banks. So I understand why all of this got mixed together, but as you point out, Allie, there was an allocation formula. It wasn't like by Harvard taking this money, it was allocated to them through a formula. And people can take qualms with the formula, that's fine, but the formula is what the formula is and it came together very quickly.

Justin Draeger: Let's turn back to the student share for just a second. We have lots of questions and lots of listener comments and questions about this portion of funding. The biggest, I guess, well a couple of pieces of news, but the biggest one might be Jill, that students have to be Title IV eligible. Can you maybe talk about that for just a second?

Jill Desjean: Sure. Yeah, so it specifies that they have to meet the requirements in HEA section 484 for Title IV eligibility, which is pretty neat and simple when you look at a piece of paper. But then when you start thinking about what exactly the implications are of that, they're broad. Not to go through all of them, but just a handful of the requirements are that the student has to be enrolled in a degree or certificate program. They have to be a high school graduate. They need to be registered with a selective service system, be a US citizen or national, which is the thing that the DACA eligibility hinged upon, just is a handful of the eligibility requirements.

Jill Desjean: There are so many questions. The first one is how do you even establish that without FAFSA? The application, the FAQ said you don't need a FASFA, you just have to have determined that the student meets the Title IV eligibility requirements. But the amount of paperwork and documentation you need to
collect and possibly even confirmation of whether it's accurate, would be a lot
to put on schools. It opens a big can of worms, a lot of questions that come up.

Justin Draeger: So people, I've gotten a couple of questions about like, "Whoa, is NASFAA just
interpreting that this is all 484?" The problem is that in the FAQ it says the
criteria to participate in programs under section 484 of the HEA include, and
now I'm emphasizing, but are not limited to the following. So if this was really
just about DACA, which I think it is, they listed citizenship and then some other
things like selective service, but it says not limited to, which says all 484, if you
count up all the things under 484, we're talking about defaulted on previous
loans, we're talking about ... So I just want to drive this home because for the
general public, this might be a bit esoteric, but if you had, for example, let's say
you have a student who has a minor drug conviction, who attended school then
had to move off campus because of COVID related issues. Given the scope of
the FAQ, minor drug convictions are part of 484, they wouldn't be eligible,
would they?

Jill Desjean: That's right. They would not.

Justin Draeger: Right. Okay. So let's say we have a student who needed to purchase a laptop
because their school went 100% online, but that student didn't register for
selective service. Would they be eligible?

Jill Desjean: No.

Justin Draeger: Okay. What about a student who had defaulted on a loan, hadn't rehabilitated
yet, but what was enrolled, let's say that student came down with COVID-19,
incurred significant medical expenses, could that student get an emergency
grant to deal with those expenses?

Jill Desjean: No, they're excluded under 484 too.

Justin Draeger: Right, so this is where it feels like the department was looking at trying to
exclude and look, we can take issue with DACA all day long and the Trump
administration, how they've approached DACA. Let's just set that aside for a
second. In their efforts to exclude DACA, it seems like intentionally or
unintentionally, they've now, for all intents and purposes, disqualified large
swaths of other students. That clearly Congress didn't, there's no indication
Congress intended for all CARES grant, emergency grant recipients, to be Title IV
eligible.

Jill Desjean: Yeah. I mean they could have made a grant program under Title IV if they
wanted to eliminate those students right?

Justin Draeger: Right, yes. Or just dumped more money into FSEOG for that matter. If that was
the intent, we already had a mechanism, it was FSEOG and loosen the
restrictions, which they did. They did both things. They created an emergency
grant program and they dumped more money and flexibilities in the FSEOG. So it just seems like there's an overstep here and from NASFAA standpoint, Megan, I want to ask you this question because I think schools are very frustrated because for weeks, since the CARES Act was passed, us and a lot of our sister associations have been talking to schools about the wide flexibilities they would have and then all of a sudden on Tuesday, it looked like the wide flexibility got narrowed down to maybe a keyhole. So what happened? Why the almost 180 degree change here?

Megan Coval: Yeah, I mean I think the important thing to note, is we were very closely following what was in statute and also in the certification agreement that the secretary put out, and there was nothing in there that at all signaled there was any room even for interpretation, for the department to say that this was only going to be for Title IV eligible students. So we were completely caught off guard by it. I mean I think we were expecting some additional information on Tuesday, maybe clarifying the DACA piece, but I think we understand the frustration of schools, especially those who spent prior to Tuesday, probably the last week or so, working on task forces and trying to get things in order and making decisions. We were going with the letter of the law and with the certification agreement and just had no idea this was coming down the pipe.

Justin Draeger: I think that part is important to emphasize because I'm not convinced the department had to take this route. This does appear to me to add a significant amount of student eligibility criteria, that Congress did not intend. And as we talked to lawmakers, this caught them as much off guard as it did us. Again, setting aside the citizenship and DACA issues, I don't think that's a surprise, where this, at least where this administration has been, the White House has talked about.

Megan Coval: One thing I was just going to say, is that I talked to two separate congressional staff on different parties, who both use the word, stunned. They said, "We were stunned."

Justin Draeger: So we do have inquiries into the department. So for example, Jill, to your point, we have inquiries about, did you attend the full scope of 484 in the HEA because as written it appears that you did. We don't have an answer to that yet. We also asked, it doesn't say there that students have to file a FAFSA. It says they have to be eligible to file a FAFSA. But this is circular logic because how do you know whether someone is eligible to file a FAFSA unless they filed a FAFSA and get an ICER or SAR back that's free and clear of any edits?

Jill Desjean: Right. Yeah. I mean anyone could fill out a FAFSA, but that doesn't determine that you are eligible for Title IV aid. What determines that you're eligible for Title IV aid, is that you've gone through all those database matches and proven that you're a citizen, that you're registered for selective service. You don't have prior defaults on and on.
Justin Draeger: So the question from schools is, well, could we just create a certification form that says I'm a US citizen? Well, yes. And even if a school wanted to verify that themselves by reviewing documentation, which I don't know how practical that is on really large campuses, but even if you wanted to do that, the problem is under 484, there are, I'm counting 13 to 15 different things that they would need to certify. So maybe that's an option, but that's not clear, at least in the guidance. And based on what we got from the department on Tuesday, I'm just very wary now of telling schools they have latitude to do X, Y, Z. When it appears that on a rolling basis, the department is slapping down almost all the flexibilities that we had previously discussed when school should be modeling out their programs. So the safest course of action, if I'm a school, the safest course of action for me right now would be to be focusing my efforts on what, Title IV eligible students. Not that they've had to have received any Title IV money, but Title IV eligible students. Is that fair?

Jill Desjean: Yeah, and probably safest, Title IV eligible as per having filled on a FAFSA versus trying to figure out some other way.

Justin Draeger: Yeah, that doesn't mean necessarily they took a loan, they don't have to have been a recipient, but they were eligible.

Jill Desjean: Demonstrated to be eligible, yeah.

Justin Draeger: Okay. I think a lot of people are asking this then. So the student has to be Title IV eligible. Do they have to be in a Title IV eligible program?

Jill Desjean: Not according to what ED said in that FAQ. Program eligibility, it's in a separate section. It's not in 484, it's in section 481. So 484 it just says that the student has to be an eligible student in a degree or certificate program, it doesn't reference program eligibility at all. So we think that they don't need to be.

Justin Draeger: Yeah, and a school will have to make its own determination given the history that we've just walked through, with the department clamping down and knowing for instance that ... There was a time when we had the certification agreement form and we thought, all right, these are the terms and conditions of these funds. Let's move forward. Then we learned late last week that additional guidance was coming and at this point I think it's fair to say additional guidance will continue to roll out from the Department of Education, which I don't know if that's comforting for a lot of people. There are some things we're clearly waiting for, like R2T4, people are still waiting for the R2T4 guidance that was granted in the CARES Act. But other things, if we're going to keep revisiting how CARES Act student grants can be awarded, I don't think-

Jill Desjean: How can you start awarding those funds?

Justin Draeger: Yeah, I don't know that schools find that very comforting. All right, so 481 at least is program eligibility. They didn't mention 481 in the FAQ, so it doesn't
appear to be included, but I guess that doesn’t preclude it from being included in some unseen FAQ in the future. All right, so Jill, let’s say that somebody does fill out a FAFSA, but it comes back with some C codes. Whether that’s something along the lines of what? It could be one of the database mismatches, that it didn’t quite line up. Should a school feel comfortable and giving them an emergency grant?

Jill Desjean: I think that you would probably have to resolve C codes because you need to demonstrate that the student met Title IV eligibility requirements. If someone filled out their FAFSA and didn’t pass the social security administration citizenship match, then you haven’t demonstrated that they are a citizen or an eligible non-citizen. Hence, you have not ensured that they need the Title IV eligibility requirements. So I think you would have to resolve C codes, unfortunately.

Justin Draeger: Yeah, so that’s the implication of a Title IV eligibility 484. Okay, well let’s keep going. What if you haven’t met SAP requirements? What if you’re not on SAP?

Jill Desjean: SAP is in section 484, so even though that’s a school determined eligibility requirement, I think that you would have to have established the student was making SAP before you awarded these funds.

Justin Draeger: What if they were above a lifetime eligibility limit on a Pell grant?

Jill Desjean: If you owed an over award, that if you owed a repayment on an over award that’s in 484 so I don’t think you could give these funds to those students either.

Justin Draeger: And all of this would be flagged on their ISIR though?

Jill Desjean: Yeah, C codes on their ISIR for all of this.

Justin Draeger: Which brings us back to ultimately, unless a student could literally certify all of these things, I think most schools would just say, "Here’s a FAFSA."

Jill Desjean: Yeah. Even verification is a gray area. It doesn’t fall under 484 but some of the items you have to verify as part of verification in the V4 and V5 groups, include pieces of 484 student eligibility, like statement of identity and the statement of educational purpose. So seems like you might have to do that to confirm eligibility as well.

Justin Draeger: All right. What about if they have a FAFSA on file from a previous year? So it’s not this year. Let’s say they’re giving out CARES grants in next year after July 1 or let’s say they have a FAFSA on file for 2018-19 but not 2019-20.

Jill Desjean: I mean we don’t know for sure, but I guess the assumption when you say the student has to meet Title IV eligibility requirements, would be that they have to meet those eligibility requirements on the day that you’re making this award.
Things can change there. If someone already registered with selective service there, I don't think it would be possible to unregister, but you could go into default on a federal student loan. You could have had an overpayment and you could even have given up your US citizenship presumably. So I think that to be safe you should probably have a current year FAFSA.

Justin Draeger: So for our listeners then, what they're probably picking up is at this point we're taking a very conservative limited view of eligibility, but that's because of the language in the FAQ that says, not limited to the following, which basically says all 484 then.

Jill Desjean: Right.

Justin Draeger: Let me ask just a theoretical question, okay. So Jill, let me ask you a question. I was talking to a reporter who asked this question, which is, how many students though do you think, don't most students fill out a FAFSA? That was the question. How large are these other swaths of students? Any thoughts on that?

Jill Desjean: Yeah, I don't know off the top of my head, what percentage of college students fill out a FAFSA. Do you?

Justin Draeger: No.

Jill Desjean: Presumably a lot of students who don't fill out a FAFSA, don't do it because they think they won't be eligible. Eligible for what though? You know what I mean? If you're at a four year private institution and your parents make a lot of money, that's different from someone at a community college who just thinks they won't be Pell eligible. That could be someone who, by other definitions, could be someone who is needy and not well off at all. But just because they are pretty sure that they wouldn't meet the Pell grant cutoff, they wouldn't bother applying.

Justin Draeger: Yeah, and I also think, and we said this in The New York Times today too, and Jill, maybe we can put that article in the show notes and The Washington Post and USA Today, but this is an overreach in terms of the Department of Education implementing something that Congress clearly didn't intend. The percentage of students who don't file a FAFSA, that percentage is hard to count because you're counting a negative. How many people didn't file a FAFSA? I mean I guess you could look at the percentage of FAFSA filers versus the overall enrollment. But there might be lots of reasons people don't complete a FAFSA. That doesn't mean they didn't have eligible expenses, which is what the purpose of the grants were. The grants were not about supplementing necessarily Title IV eligible funding that went out. It was about meeting emergency expenses.

Justin Draeger: I don't see what that has to do with having to be eligible for a Pell grant. I mean obviously we want to sort need and most schools are going to do that. But if I asked a bunch of schools, which I did last night, I've asked schools every day, but
last night we had a bunch of schools on a separate call and I asked, where are you spending your CARES Act emergency grants right now? And they all said the same thing, which is, on our Title IV students and we're trying to get more people to file a FAFSA. That's the practical implementation that schools are going to take because I don't know how else they would figure out all the stuff under section 484. All right, the other thing we did, we had a heads up about, we tried to model this out for schools to be thinking about this way, but can you touch on Jill, the emergency grants for students, how that can be applied to tuition fees or outstanding charges at the school?

Jill Desjean: Yeah, so we know that the emergency grants to students cannot be used to pay any institutional charges. I don't think we have any updated information from what, I don't remember when we talked about this, on which podcast or which webinar, but we don't think there's anything wrong with letting these funds flow through your student information system. You might just have recognized deficiencies already, you've got a system in place. It might be easiest for you to just take those funds, apply them to a student's account, disperse them through your student account system and get them onto a prepaid debit cards or direct deposited into bank accounts, according to the way that you would issue just normal student aid refunds. You would just have to be super careful to make sure that those funds did not pay any institutional charges. But we don't think there's anything wrong with using your system as just a pass through, just to get the money into the students hands.

Justin Draeger: Yeah, that's almost semantics a little bit. It just can't be used to offset any outstanding balances. But Jill, what happens if a student tells the school, yes, please pay off my tuition charge?

Jill Desjean: Our understanding is that even with the student's permission, you cannot do it, so you have to give the money to the student and then the student needs to come back and give the money back to you, if it is their intention to pay the institutional charges with these emergency funds.

Justin Draeger: The FAQ actually says, without exception.

Jill Desjean: Yeah.

Justin Draeger: Yeah. There are no exceptions here. It has to go to the student. So Megan, let's pause for just a second. I should add that there are obviously a lot of questions people still have, we are scheduling another webinar. We're doing these about every two weeks. I think our next one is May 1, which is roughly a week from today. So we'll see if we have some additional guidance from the Department of Education, specifically around students self-certification, which again, I'm not sure most schools would even use if it was available and around the scope of 484. So join us for May 1, that's an open free webinar to both members and nonmembers of NASFAA. Megan, where's Congress headed next?
Megan Coval: So they are going to work on a large fourth relief bill. At this point, the last that we heard, we probably won't see any movement on that or very concrete draft texts until mid-May. But judging by conversations that we’re having with health staff, it would seem to be that there is interest in having additional higher education provisions in there and those could come in the form of technical corrections or other, I'll call them smaller issues that didn't make it into the last bill. And I think there's also on a larger scale, a focus on just trying to get more money to higher education institutions and students and also tinkering a little bit more with some borrower relief. So I think those are the biggies. I think it might be a little bit more about partisan battle this time around and it's not to say that those things won't happen, but there's a lot in there and a lot to be discussed. But nonetheless we will see something else and I'd be shocked if it didn't include more items for secondary education.

Justin Draeger: So we will keep our eyes on all of that. Keep members informed. We've talked about the May one webinar, Megan, we also have a new reference sheet out for schools.

Megan Coval: We do, yes. This came out today. It's a reference sheet in the form of a QA document on the student emergency grant funds, under the higher education emergency fund. We've done a lot of podcasts and webinars but we did just want to have something written for folks to look at or to share on different task forces they might be working with on campus. So important note there is just keep an eye for when it gets updated and we have it in red at the top that it's effective as of X date. Because like you were saying Justin, the changes are coming almost daily at this point, so we want to make sure that that's a living doc.

Allie Arcese: So today we also have here with us Mark San Marino from DeVry and if you guys remember a couple of weeks ago we first asked you to answer a listener question and share why you would want to be on the podcast. So Mark was one of the people who responded to that call and similar to when we had Renee Swift on here a few weeks ago, we have a short quiz for you. Are you ready?

Mark San Marino: I'm ready. Let's do it.

Allie Arcese: Okay. And we are recording this at the beginning of our meeting, just so you guys know, he wasn't listening to this whole conversation and cheating on our quiz. So the first question is, in order to receive emergency grant aid according to new guidance from the Department of Education, the student must be blank.

Mark San Marino: The student must be eligible to file the FAFSA.

Justin Draeger: We are looking at our judges. Jill, what do you think?

Jill Desjean: I'll accept it.
Justin Draeger: All right. You'll accept, for all practical purposes, we don't know that there's really a way around this at this point. But yes, they have to be Title IV eligible. All right, ding, ding, ding. That's one. How many does he have to get right to win the prize though?

Allie Arcese: Two out of three, same rules as last time.

Justin Draeger: All right. All right.

Allie Arcese: Okay. Name one of the institutions that has recently rejected funding from the CARES Act. So they are not going to accept the money.

Mark San Marino: Harvard.

Allie Arcese: Correct.

Justin Draeger: What other schools were there?

Allie Arcese: So far Yale, Stanford, Princeton, those are the big ones that I have seen.

Justin Draeger: All right.

Allie Arcese: Finally, who is your favorite “Off The Cuff” podcaster? No pressure.

Mark San Marino: Should've seen that coming since that was in the last round of questions, yet I am not prepared for that. I'm going to cop out on this. I have to say that I really miss having Stephen around.

Justin Draeger: No, wrong. No, we actually all miss Stephen.

Allie Arcese: Stephens probably everyone's favorite.

Justin Draeger: Shout out. All right, that's fine. We can't give that one to you, but we share your sentiment. Allie, how many-

Mark San Marino: Well anyway, it was two for three and I had gone for two, so it was okay.

Allie Arcese: You did get two of three, so you are a winner.

Justin Draeger: All right. What is he going to win?

Allie Arcese: Our “Off The Cuff” earbuds.

Justin Draeger: All right.

Allie Arcese: Great to keep in your bag for those times when you're on an airplane and you're like, "Oh crap, I don't have earbuds."
Mark San Marino: Nice. And maybe one day I'll be on an airplane again.

Justin Draeger: Yeah, that's fine. Yeah. So Mark, we're really glad that you came and joined us today. I know you guys are, it sounds like, involved in some community volunteer work. Do you want to share just a little bit with listeners what you guys are doing and maybe we could ask others to write in and share what they're doing in their communities?

Mark San Marino: Sure. Yeah. So quickly, being that only 20 to 25% of our students initially were enrolled on campus, the transition to remote learning was relatively painless compared to what I know a lot of other institutions are experiencing or have experienced. And so we started putting out some feelers and over the past two weeks we've partnered both with our regulator here in Illinois, also yesterday and today we're doing the same thing with the Commission for Independent Education in Florida. Basically just offering a series of webinars to education administrators, and then also a separate one to faculty, just to share some of those best practices on how to make that transition a little bit more successful and painless. Even though these schools are competitors in a lot of cases, we just feel that at a time when we're facing challenges such as these, it's important for everyone to work together and I know that that's how the financial aid community operates and the higher education community should operate that way as well. So we were just interested to know what other financial aid folks might be doing.

Justin Draeger: That's great. Good work. Hats off to you guys and I think that's a great question, Mark. So if other people want to write in and tell us what they're doing and how they're serving their colleagues in higher education or in their local communities, love to hear it. I'm really glad that you could come on today, Mark and Allie, for other people who want to join us on a future edition of “Off The Cuff,” what do they do?

Allie Arcese: So if you want to write in and answer Mark's question and let us know what you've been doing and why you want to come on the podcast, then we will be in touch.

Justin Draeger: Thanks for coming out, Mark.

Mark San Marino: I really appreciate the invite. Guys, keep up the great work. This is my top podcast, I listen to it every week and so wish you all well.