



# **RETURN TO RELEVANCE:** A HISTORY OF THE NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS 2012-2017

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# Return to Relevance: A History of the National Association of Student Financial Aid Administrators 2012-2017

In the outset of their book about higher education finance, Quadlin and Powell (2022) aptly observe, "The completion of a college degree is among the most important factors in determining whether a person achieves economic stability and success, broadly defined, in their lifetime," (p.1). This statement provides the context in which Quadlin and Powell (2022) attempt—as others have—to answer a question that is at the heart of financial aid policy and practice: *who should pay*? This question swirls at the core of philosophical, social, economic, and moral debates about the purposes of higher education in the United States. As the sole professional association dedicated to representing financial aid administrators, the National Association of Student Financial Aid Administrators (NASFAA) sits at the nexus of policy and practice, helping shape policies about *who should pay* while also shepherding through the implementation of those policies. With about 70% of full-time, first-year students receiving federal financial aid in 2017-18 (more if we include state and private aid), NASFAA plays a unique role among higher education professional associations in advocating for policies and practices that directly impact most students.

The history of NASFAA is important to document for the sake of the Association and its members, but also because the story of NASFAA is embedded in the streams and currents of higher education more broadly, both reflecting and shaping those forces. Therefore, the aim of this project is to document the history of NASFAA from 2012 to 2017, serving as an update to prior histories (Brooks, 1986, 2015; Huff, 1998, 2013a; Gross & Ingle, 2013). As in the last (Gross & Inge, 2013) update, this is not a timeline of events. Rather, we construct a thematic historical narrative of the Association that places it firmly in the landscape of U.S. higher education at the time. We view this work as what Thelin (2004) calls a horizontal history of higher education, or the study of the "... founding and influence of organizations and agencies that cut horizontally across the higher education landscape," (p. xxvii). We begin by delineating the two main principles that guided data collection and analysis and shaped our writing of this piece.

First, we hold the perspective that no single historical truth exists to be uncovered and told, but that historical analysis can help us see patterns in past events (Gaddis, 2002). In this project, we looked for recurring topics, themes, and issues as we read primary documents and conducted interviews. Different interpretations of the data may exist, particularly among those who experienced events firsthand. This leads to our second guiding principle: It is not our intent to recreate an exhaustive narrative of past events, but rather offer a broad perspective from a somewhat removed vantage point. Romano puts it aptly, "...[H]istory is only useful when it is a representation, not a reproduction; it must make the past legible to those who seek to learn something about it," (p. 32, 2012). Of course, the period under consideration in this project is in the very recent past, which constitutes its own set of challenges, as well as benefits. Certainly, this is a *recent* history.

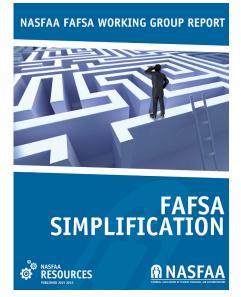
A particular challenge in conducting recent history is that the past is "not yet dead." A common defining characteristic of historical work is a distinct break between the past and the present (Romano, 2012). Obviously, no such break exists between the conduct of this study and its period of focus. Indeed, it is difficult not to interpret some of the themes—such as the role of technology in the Association during this period—without being guilty of some presentism. The utilization of messaging tools such as Slack during this period seems especially prescient as we write this narrative in a post-COVID environment. Already adept at virtual interactions, arguably NASFAA was exceptionally well-poised to adapt during quarantine.

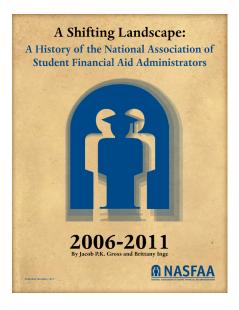
Nonetheless, we feel that this narrative benefits a certain historical nearness with access to oral histories, a rich trove of primary documents, and the ability to triangulate our interpretations with key figures from the period. Certainly, with the passage of more time our conclusions and understandings might change. This is not antithetical to our work, but rather the nature of historical interpretation. This is consistent with our belief that no single historical truth exists and that telling of history is incremental and partial. With these principles and considerations in mind, we begin the narrative of NASFAA's history from 2012 to 2017.

## A Seat at the Table

In September 2015, the White House Office of the Press Secretary announced an "...earlier, easier process for federal financial aid," (p. 3). The press release announced a change effective October 1, 2016 in the Free Application for Federal Student Aid (FAFSA) filing process that the administration and others hoped would remove barriers to applying for and receiving federal financial aid. Known as "early FAFSA"—or more commonly, "prior-prior year" (PPY)—the change would allow students to use income data from two years before the academic year they were applying for financial aid. For example, if a student was applying for financial aid for the 2016-17 academic year, they could use income data from their 2014 tax return, rather than waiting to use their 2015 tax return. PPY was heralded as a necessary (although not sufficient) step in making it easier for students to apply for aid earlier, giving them more time to make informed decisions about college affordability and options. Prior to the PPY policy change, students had to wait until after January 1 of the year they were applying for aid to submit their FAFSA and use their tax information from the previous year.

The specifics of PPY are discussed more below, however, the passage of PPY was emblematic of NASFAA's renewed standing as the advocacy voice for public financial aid policies that increase student access and success. In July 2015, NASFAA had released findings and recommendations on FAFSA simplification from its working group on the topic. In its report, the working group called for the use of prior-prior year income data to determine student aid eligibility and to expand the Internal Revenue Service's (IRS) Data Retrieval Tool (DRT) to include all line items of the 1040 and W2 information (National Association of Student Financial Aid Administrators [NASFAA], 2015aa). This report was tied to NASFAA's work with the Bill & Melinda Gates Foundation, which released its own, but related report (Bill & Melinda Gates Foundation, 2015) that same July calling for the same changes for which NASFAA advocated. Significantly, this policy work by the Gates Foundation represented its first substantive foray into the postsecondary policy space. Also significant is the fact that NASFAA was a signature partner. In its press release, the White House cited the policy advocacy of NASFAA in making the change and also highlighted the role NASFAA would play in helping postsecondary institutions implement the change for the coming year.





Contrast this with just a few years earlier in the Association. In the period 2006-11, "survival" was cited as the greatest accomplishment of NASFAA by several people interviewed for a history of that time (Gross & Inge, 2013). In the span of those five years, NASFAA responded to a high-profile investigation of preferred lending practices by then New York Attorney General Andrew Cuomo; the retirement of long-time leader Dr. Dallas Martin; the hiring and subsequent resignation of Dr. Philip Day; a crisis of public confidence; the hiring of its third chief executive officer in four years; and a seemingly unending stream of changes in federal financial aid policies and practices. As one interviewee noted for this project, "the shine had come off" NASFAA in some ways during the preceding period and its legitimacy had suffered among some policymaking circles in Washington, D.C. By 2017, NASFAA listed among its accomplishments championing the passage of PPY; expanding its support of the financial aid profession through NASFAA U and AskRegs; enhancing the professionalism of its Board of Directors; streamlining organizational governance; leveraging technology internally and externally to increase value for members; supporting borrowers at proprietary institutions that closed; implementing an enforceable statement of ethical principles; and more (NASFAA, 2013, 2014, 2015, 2016, 2017). Supporting these accomplishments were (a) changes in organizational structures for governance and leadership of NASFAA; (b) renewed legitimacy in policy advocacy efforts; (c) enhanced supports for the profession of financial aid administration; and (d) a renewed focus on serving as student advocates. These four themes serve as the pillars for organizing this narrative of the 2012-17 period.

Before delving into these themes, we first acknowledge that the periodization employed here is somewhat artificial. Periodization—the practice of breaking up time into discrete, quantifiable chunks—is a common practice in history. Pragmatically, any historical narrative has to be bound by a discrete theme or period of analysis. However, this chunking may give the impression of disconnectedness among events from one time period to the next. We believe that may be the case in this narrative. We think the concept of "punctuated equilibrium" is helpful for connecting 2012-17 to the prior periods, especially 2006-11, and helps us understand the events of this period better.



Dr. Dallas Martin, NASFAA President, 1975-2007



Justin Draeger, NASFAA President & CEO, 2010-present

Punctuated equilibrium is a concept borrowed from the study of evolution. It posits that evolution does not just occur at a steady rate, but that it is characterized by long periods of stability that are punctuated by abrupt changes which tend to give rise to new species. In history, this applies insofar as a historian studying a particular event may not trace the causes and influences of that event back to the start of time, but rather to a point when an equilibrium that once existed was punctuated by the event being studied (Gaddis, 2002).

NASFAA enjoyed a long period of relative stability as an organization. Dr. Dallas Martin had served as leader of the association from its near infancy in 1976 to its maturity as an organization, retiring in 2007. NASFAA enjoyed influence in federal financial aid policymaking, was generally well-regarded among associations, and was on solid financial footing. However, between 2006 and 2009, a confluence of factors punctured that equilibrium. These factors, mentioned above and detailed in Gross and Inge (2013), included Martin's retirement, the Cuomo investigation; the short tenure of Dr. Philip Day Jr. as president and CEO of NASFAA; increased federal scrutiny of the profession; the growing influence of philanthropic foundations in federal education policymaking; and calls for greater accountability of aid administrators. This created instability to which NASFAA had to respond, evolving as an organization. That began in 2009 as Interim President Joan Holland Crissman, along with the Association Governance and Membership Committee (AGMC), appointed a Presidential Search Committee (PSC) to replace Dr. Day Jr. and made procedural changes to the hiring process that prioritized transparency and inclusion. And the adaptation continued once Justin Draeger was hired in May 2010, with reduction in the size of the Board of Directors (from 33 to 21) as one of the first changes. That is where this history picks up, in 2012, with the evolution of NASFAA into the organization it has become today—once again in a period of stability.

# **Organizational Evolution**

Coerver and Byers (2013) write, "The challenges confronting associations in the new normal environment are considerable. And this challenging environment requires associations to be more focused, more competitive, and considerably more adept at using resources," (p.7). The challenges associations face, according to the authors, include competition from other associations, technological change, changing member markets, generational differences in expectations for associations, and limited member time. Certainly NASFAA, as a member-based association, faced similar challenges. With declining financial support for higher education, institutional budget cuts, declining enrollments in some sectors, and ever-increasing demands on the time of financial aid professionals, NASFAA could not simply rely on raising member dues and counting on members' volunteer time to continue with business as usual.

With his appointment as President and Chief Executive Officer in 2010, Justin Draeger began working with the Board of Directors and the NASFAA executive leadership team to make changes to the way NASFAA did business. Notably, the association voted to reduce the size of the Board from 33 to 21 members. However, between 2012-17 more changes were made, including to governance structures, member services, and revenue generation. Specifically, NASFAA implemented the much-discussed Statement of Ethical Principles; most standing committees were eliminated and a task force model was adopted; technology was leveraged to enhance the value of association membership; and the association heightened its entrepreneurialism as it looked for ways to enhance value and diversify its revenue.

# We Were in a Bad Position - Enforcing Ethical Principles

Professional ethics received renewed attention at NASFAA following the Cuomo investigations and the improper use of preferred lenders at a small number of institutions. As 2012-13 National Chair Ron Day described it, "...we were in a bad position at one particular time as a profession because we were viewed as being placating, if you will, to all these big banks," (R. Day, Personal Communication, 2023). Initially led by Day, then continued by 2013-14 National Chair Craig Munier, the Association engaged in a period of self-reflection, assessment, and action. In 2013-14, the Task Force on Ethical Standards, chaired by Mary Sommers, was asked to review the Statement of Ethical Principles and the Code of Conduct (NASFAA, 2014). The Statement of Ethical Principles begins, "The primary goal of the financial aid professional is to help students achieve their educational goals through financial support and resources," (NASFAA, 2017). It goes on to say that aid administrators shall advocate for students, maintain the highest levels of integrity, support student access and success, comply with the law, strive for transparency and clarity, and protect the privacy of financial aid applicants. The Code of Conduct is more specific in its guidance, spelling out what may constitute a conflict of interest, detailing what as well as how information should be shared with applicants in the interest of transparency, and even outlining what should be included in financial aid offers to applicants (NASFAA, 2015o).



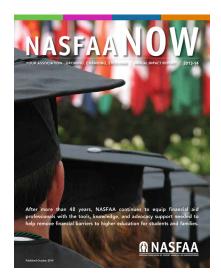
Ron Day, Kennesaw State University, NASFAA National Chair 2012-2013



Craig Munier, University of Nebraska, NASFAA National Chair 2013-2014

The Association's work on its ethics and professional conduct extended beyond the revision of its statements and codes, however. The Task Force on Ethical Standards consulted with members, legal counsel, and other associations to update guidance, which was officially adopted in March 2014. In addition, the task force developed enforcement procedures, which were reviewed and adopted by NASFAA in 2014. As quoted in the NASFAA 2013-14 annual report, Sommers said, "Ultimately, the Board decided that setting a Code of Conduct without any additional education or repercussions would have a minimal impact on our ability to hold ourselves accountable," (NASFAA, 2014).

Education and enforcement were the two paths of action taken to enact the values. Educational activities included publishing the Statement of Ethical Principles for several years in the front pages of the Association Annual Report. Additionally, NASFAA created a member forum called "Ask Mr. Ethics," where members could email ethical questions that would then be anonymized and re-posted for other members to read. One example of an ethical concern was under what circumstances financial aid administrators could share student personal data. In fact, on this question NASFAA went so far as to release a white paper on financial aid data sharing and even create a data disclosure decision tree, which could be used in a step-by-step process to evaluate requests for student data.



Enforcement was the other prong. As National Chair, Day appointed the first Ethics Commission, which was charged with enforcement of the code of conduct. As part of its efforts, NASFAA devoted time and resources to holding members accountable through mechanisms for receiving and reviewing complaints. In addition to an online complaint submission form, members of the newly empaneled Ethics Commission could receive complaints. A seven-page procedural document for enforcement of the code of conduct was created, specifying the complaint process, review of complaints, composition of the hearing board, and sanctions that could be levied. Sanctions include a statement of concern, a formal reprimand, a temporary suspension, and finally a permanent suspension. A permanent suspension would exclude the member found responsible for wrongdoing—and senior executives in the office—from any NASFAA or NASFAA affiliate activity. Moreover, those permanently banned would be listed on the NASFAA website. After five years, however, the member could re-apply for membership with appropriate evidence of improvements made (NASFAA, 2015ag).

# Harnessing Human Capital - The Move to a Task Force Model

In 2012-13, NASFAA had 14 standing committees, ranging from the Research Committee to the Financial Affairs Committee to the Journal of Student Financial Aid editorial board. Collectively, these committees involved the volunteer time of just over 100 NASFAA members and more than 15 NASFAA staffers. That year there were just two task forces—one related to the Higher Education Act reauthorization and another related to student indebtedness. In 2016-17, more than 500 individuals volunteered to serve on a committee, task force, working group, governing board, editorial board, or mentor group (NASFAA, 2017). In just a few short years, the long-standing committee structure was gone, replaced primarily with charter-driven, time-limited task forces. This may seem like a relatively minor shift in how NASFAA accomplished its work. Certainly, the change did not receive any attention in the higher education news media. However, the transition to a task force model represented a clear break from the Association's old way of doing business and was part of a broader, systematic effort among NASFAA's leadership to adapt to the "new normal." This broader effort is discussed more later. We first compare the committee structure with the task force model.

Prior to 2013-14, the year that task forces began to grow while the committee structure shrunk, standing committees existed to help NASFAA accomplish its goals and objectives. The committees represented operational and topical areas for the Association. For example, there were committees devoted to financial affairs, publications, technology, training and professional development, research, the national conference, and graduate and professional issues, to name a few. Each committee had an assigned staff liaison, a chairperson, and volunteers, the number of which depended on the charge of the committee. Some committees that required specific expertise and were more time intensive, such as the Financial Affairs Committee, were small, numbering 10 or less. Other committees, such as the Journal of Student Financial Aid editorial board, numbered more than 20 volunteers.

Volunteers were selected annually for the committees, although some volunteer appointments spanned several years—again depending on the nature of the committee. Each year, the National Chair, the President and CEO, and the committee chairs would convene, in person, at what Draeger (Personal Communication, March 1, 2023) informally referred to as "the annual draft." Drawing on the pool of people who had volunteered to serve on a committee, including those who may have already been serving, the committee chairs—like coaching staff—would take turns picking their committee members, with input from both the National Chair and the President and CEO, until all the committees were filled. From there, the committee chairs would go back to meet with their committees, develop their agenda for the year, and then draw on NASFAA staff for support and funding, as needed. This approach to harnessing volunteers had several shortcomings.

First, as Draeger notes, "It was almost like we had two heads of state," (J. Draeger, Personal Communication), referring to the National Chair and the President and CEO, but also to the disparate agendas that could develop between the NASFAA staff and the standing committees. With this approach, there was no systematic way to ensure that the goals and objectives of each committee were tightly coupled with the strategic long-range plan developed by NASFAA leadership and its Board of Directors. As Draeger (2023) observed, "The process was disjointed from both our long-range strategic plans and our annual operational plans. It felt like the goals were conforming around the structure, as opposed to the structure conforming around the goals."

A second shortcoming of this approach was the underutilization of human capital among volunteers and staff. Human capital in this context represents time and talent. Volunteers were asked to serve for at least one year, a difficult proposition for those that came from smaller financial aid offices with fewer colleagues to help carry their workload. Also, volunteer talent may or may not have aligned closely with the charge of the committee. Of course, efforts were made to draft volunteers according to their interests and expertise, but there was no guarantee that the annual agenda for the committee would align with the volunteer talent, given that agendas were set once the committee had been populated.

Similarly, for NASFAA staff, the committee structure may not have been the best utilization of their time and talent relative to their responsibilities with the Association. Former Vice President of Public Policy and Federal Relations, Megan Coval, reflected on her work with the Federal Issues Committee: "Even with everything going on in the student aid world, it was always a little bit of a struggle building the agenda for them. It always felt like they have to have a meeting, so what are we going to have them talk about versus here is an issue we need input on," (Personal Communication, February 24, 2023). In some ways, the committee structure as utilized at NASFAA seemed to take on a life of its own, with committees becoming an end in and of themselves rather than necessarily a vehicle for accomplishing a particular goal.



Megan Coval, NASFAA Vice President of Public Policy, 2010-2021

In addition to the human capital involved, committees cost NASFAA financial capital. Committees typically met at least once a year, in person, with the cost of travel, lodging, and food borne by the Association. Some committees met more often, again depending on their charge. In addition, costs associated with committee selection were incurred by the Association. Given that committees existed in apparent perpetuity, they became a fixed cost for NASFAA, that is a business expense that was recurrent, no matter the level of goods or services produced.

Finally, another potential weakness of the committee structure came to develop over time: the perception of exclusivity. Membership on a committee was viewed by some as a privilege that was accorded to a relatively select few, and that those who were chosen benefited personally, such as through the opportunity to travel with expenses paid. The 2014-15 National Chair, Eileen O'Leary, described this perception: "You could apply to be on a NASFAA committee until you were blue in the face, [but] only the 'in crowd' got a place. That was the feeling. Was it true? I don't know," (Personal communication, February 9, 2023). There is no evidence as to how widespread such a feeling was or whether selection to serve on a committee was afforded to a select few. However, the perception of exclusivity was mentioned by every National Chair who served during this time period and was interviewed for this report.



Eileen O'Leary, Stonehill College, NASFAA National Chair 2014-2015

Given these weaknesses of the committee structure, NASFAA leadership took seriously the recommendation of Coerver and Byers (2013) in their association management guidebook, "Road to Relevance." In that book, the authors recommend that all committees be eliminated unless they require volunteer expertise or oversight and recur annually. An example of such committees are the Association Governance Committee and the Financial Affairs Committee. Both committees are intended to provide external oversight of core areas of NASFAA operation. Both require specific experience and expertise. And both are essential year after year. Other committees—like the Research Committee, the Graduate/Professional Issues Committee, and even the Federal Issues Committee—did not meet these criteria and were eliminated. This transition occurred between 2012 and 2017 and was done in conversation with the Board of Directors. In the place of committees, task forces and working groups were constituted when an issue required it. A task force was given a specific charge through a chartered document, making its goals, time frame, and budget clear. For example, the 50<sup>th</sup> Anniversary Task Force was tasked with planning the Golden Anniversary of NASFAA starting in 2014 and ending in 2016, prior to the actual celebration. Importantly, task forces were begun with an end product in mind. This could take the form of a report, a series of recommendations, or even the Association's golden birthday bash.

The shift to a task force model was viewed as a success by NASFAA staff leadership, as well as the National Chairs who served during this period. The move is credited with expanding and diversifying the pool of volunteers as well as enhancing the effectiveness of the organization. For example, the work of the Prior Prior-Year Task Force culminated

in a series of recommendations, some of which were adopted as part of that policy change, as discussed above. Between 2013 and 2017, task forces produced nearly 30 reports for the Association, ranging from recommendations on federal policy to suggestions for conference sponsorship by businesses and associations. As evidence of the rise of task forces, in the 2012-13 annual report the phrase "task force" was used 24 times, compared to 60 times in the 2015-16 annual report. Also, if there was a perception of exclusivity under the committee structure, that perception does not appear to be widespread now. In its 2016 membership survey, 6% (n=22) of open-ended comments from members said that NASFAA should make task forces and committees more accessible to newer financial aid administrators (NASFAA, 2016b). In the 2016 annual strategic long-range plan review, NASFAA staff reported to the board that 55% of members of task forces that year reported they had never served on any NASFAA committee before (NASFAA, 2016e).

In reflecting on this shift—or better yet, reversal—of the roles played by committees and task forces, one might conclude that committees were ineffective compared to the task force model. This conclusion is ill-founded and ignores context. There is no concrete evidence that committees did not accomplish tasks and achieve goals and objectives. In fact, there is ample evidence that they did—the budget of NASFAA was balanced, training and professional development was delivered, and magazines and journals were published each year. Rather, the question is whether committees remained the best organizational structure for NASFAA given the changing higher education landscape and the "new normal" for associations. With that context in mind, it is apparent now that the task force model provided a more efficient and effective way of doing business, with efficiency determined by the amount of human and financial capital they require and effectiveness judged by how they advanced NASFAA's strategic long-range plan.

The shift to task forces was not the only change made over this period to NASFAA governance policies and procedures. Besides the board size being decreased, a number of efforts were undertaken to enhance the professionalism and effectiveness of the Board. As 2012-13 National Chair Ron Day reported (NASFAA, 2013), "This year's board took a tough look at itself, evaluating its own effectiveness via surveys at the beginning and end of the year; examining the board duties of care, loyalty, and obedience; and making strides to cultivate future board members and chairs," (p.5). Roles and expectations were clarified; board members received additional training and professional development regarding the roles of boards and board members; and the Association reviewed its board policies and procedures, articles of incorporation, and governance documents (B. Maglione, Personal Communication, March 16, 2023). For example, in 2013 the Board of Directors voted to amend the Nominations and Elections Committee policy to state, "To avoid conflict of interest, NEC members must agree to refrain from running for any NASFAA office for the duration of their service on the Nominations & Elections Committee. Members will not be allowed to resign from NEC in order to run for office," (NASFAA, 2013k). As another example, the Board realized that most standing committees, like the Financial Affairs Committee, had clear charters, but the Association Governance Committee did not. So, in 2013 the Board of Directors reviewed and adopted a charter for AGC (NASFAA, 2013e). In addition to these changes, the board moved to adopt a simplified version of parliamentary procedure to govern its board meetings, including adopting a consent agenda whereby routine or informational items are not discussed, but rather passed in bulk by a single vote, thereby focusing time and attention on more substantive issues for deliberation and debate during board meetings (B. Maglione, Personal Communication, March 16, 2023).

The preceding governance changes were part of a multi-year, systematic effort to review and, when needed, revise the procedures, policies, and practices of the Association. Begun in 2010, when Draeger assumed the presidency, this effort continued into this period. It was the yeoman's work of organizational leadership and governance. NASFAA leadership, in partnership with the Board and in consultation with its members, reflected on its mission and value, developed strategic plans, evaluated its functions, and considered its operational environment. The cumulative effect has been an evolution in NASFAA that has helped it by many accounts thrive as an association in the contemporary higher education context. One way it helped NASFAA was to strengthen the leadership pipeline for the Association, as evidenced by the fact that members of the 2012-13 board went on to serve as national chairs for the Association between 2015 and 2023. Another way in which NASFAA has thrived is in its leveraging of technology and support of its members' needs. We discuss this next, specifically NASFAA U, AskRegs, the Compliance Engine, and other tools developed to enhance the training and development of NASFAA members, but also to increase the value of a NASFAA membership. In some ways, this required a shift in organizational thinking about what members wanted from the Association.

## Members of a Movement or Subscribers to a Service?

As recounted in Steven Brooks' (1986) history of the first 20 years of NASFAA, the association began "...as an effort on the part of a small group of aid administrators to coordinate more effectively the regional associations of financial aid," (p. 2). The first committees established as part of the organizing efforts pertained to policy advocacy and professional development, which to this day remain central components of NASFAA's mission. In many ways, the founders of the Association were part of a movement, that is a group of people who share the same beliefs, values, ideas, or aims. Led by NASFAA Founder Allan Purdy, financial aid administrators came together to create a structure to advocate for specific aid policies and to help professionalize the practice of aid administration. What brought the members together was common purpose and belief, coalescing in the creation of NASFAA. Ostensibly, shared values and a belief in the profession of financial aid are shared characteristics among NASFAA members.

However, as noted by Brooks (2006) in his research on association participation, expectations about being a member of an association, specifically the benefits that come from membership, appear to vary by generation. For example, members of Generation X may expect services that are of immediate and tangible use, or they may need more career enhancing benefits to feel their membership is of value. Generational differences can influence the expectations of members. Moreover, as noted by Coerver and Byers (2013), competition for members has increased, putting pressure on associations to enhance the value proposition for those who choose to join. This is the context in which NASFAA evaluated and in some cases undertook new initiatives, leveraging technology to meet member needs. As Draeger observed, "Members don't necessarily see themselves as part of a movement. If they do, we should be that home for them, but some members see themselves as subscribers. If they are subscribers we should be their home too," (J. Draeger, Personal Communication).

#### **Clearing the Garden**

A key step in meeting member needs was to evaluate existing products and services in terms of user satisfaction, profitability, and centrality to the core strengths and mission of NASFAA. Coerver and Byers (2013) note that associations may be quick to add new services for members, at times in a hodgepodge fashion, but it is rare for an association to undertake a systematic review, looking for opportunities to change or even cut services. In 2012, Draeger reported to the Board of Directors that NASFAA staff had undertaken an evaluation process to assess the efficacy, value, and market penetration of their various products and tools and had determined areas to grow, re-tool, or eliminate (National Association of Student Financial Aid Administrators, 2012d). Chief among these areas to grow and re-tool were NASFAA U and AskRegs.

#### NASFAA U

In 2012, NASFAA University (soon referred to simply as NASFAA U) opened its virtual doors, a re-tooling of NASFAA's long-standing practice of providing professional development to members. According to the 2013-14 annual report, "NASFAA U offers a nationally recognized, consistent, and rigorous program of education in administering the Title IV student financial aid programs. In addition, it provides professional credentials to recognize the expertise that seasoned professionals have already gained through

on-the-job experience," (NASFAA, 2014, p.25). In its first year of operation, 328 Self-Study Guides were downloaded by members. By the second year, that number had increased to 1,254, including new guides (e.g., campus-based programs) that were added as part of the gradual expansion of offerings.

NASFAA U was a strategic initiative designed to enhance the value of membership through meeting professional development and training needs of members. It constituted a significant investment of board-designated funds (i.e., unrestricted money to be used at the Board's discretion for strategic purposes). For example, in 2013, \$25,000 was invested in increasing the number of adjunct faculty teaching courses and another \$60,000 was allocated for hiring a psychometrician to help develop the credential testing (NASFAA, 2013ac). The financial investment was ongoing, but not with the intent of subsidizing NASFAA U in perpetuity. At the November 2012 Board of Directors meeting, Draeger reported that NASFAA staff were developing delivery and pricing models for consideration by the Financial Affairs Committee because at the current levels, NASFAA U would be a money-losing proposition over time.

By 2017, NASFAA U had expanded to include 17 topic areas that were available in three formats: Self-Study Guides, online courses, or state and regional authorized events (NASFAA, 2017n). Topics ranged from administrative capability to cost of attendance to verification. Members could study each of the topical areas in any of the three formats and then take a test to receive a credential in that area. Authorized events were a re-tooling of NASFAA training offerings to state and regional associations (formerly called NASFAA CORE). Moreover, they serve as an example of NASFAA concentrating its expertise and resources in a strategic area to remain relevant as an association. Described in the 2017 annual report, "Authorized Events allow states and regions to provide high-guality NASFAA U training without getting bogged down in the development and annual updates associated with creating training materials," (p. 30). NASFAA leveraged a core strength—training capacity—to fulfill a membership need, while also turning the potential for competition from state and regional financial aid associations into an opportunity for collaboration. As 2016-2017 National Chair, Lisa Blazer noted, "NASFAA U was one of the major initiatives that offered a lot of value to members. It went through its ups and downs, but it improved and became a key offering to membership" (L. Blazer, Personal Communication).







Dr. Lisa Blazer, University of Texas at San Antonio, NASFAA National Chair 2016-2017

#### AskRegs

The practice of administering financial aid at colleges and universities requires expertise and familiarity with a myriad of regulations, procedures, and laws. As part of its early efforts to replace training by the U.S. Department of Education, NASFAA envisioned a comprehensive reference document. Begun in 1982 and finished in 1984, Ruth K. Burns, a NASFAA member and financial aid administrator, authored the NASFAA Encyclopedia of Student Aid. The



impetus for the reference book was twofold. First, federal subsidization of and involvement in training financial aid administrators was waning under the Reagan Administration. Second, NASFAA viewed the book as an opportunity to demonstrate its unique expertise and professionalism in the financial aid space (Brooks, 1986). The intent was to update the reference book periodically, as laws and regulations changed, and to offer it to members on a subscription basis. Although well received by members, by 1997 the product began to experience revenue shortfalls. Plans were made to move the entirely paper-based document to an electronic format, on a hard disk and also to increase marketing. In 2001, the Encyclopedia continued to lose money as subscriptions to it fell (Huff, 2001). In 2003-04, the Encyclopedia was moved primarily to a web-based format, from the hard copy and CD-ROM based versions with the hope that the move would make it financially viable.

Generating revenue was not the only challenge faced by this product. As evidenced from the move to paper, to CD-ROM, and finally to the internet, the format for delivering the content of the Encyclopedia evolved as technology changed. The Encyclopedia always constituted a knowledgebase, that is a collection of information organized around a particular topic that is designed for self-service access. As interconnected computing power grew, the ability to organize and access information also grew, giving birth to fully digital knowledgebases that could be quickly searched online.

It was in this context that the AskRegs Knowledgebase was softly rolled out in October 2012 (NASFAA, 2012d). Although AskRegs had existed prior to the Knowledgebase in the form of a call-in question line and email, this model of answering questions was unsustainable in terms of resource requirements. Enhanced computing power and internet accessibility made the shift to the new model more effective, efficient, and comprehensive in terms of regulatory coverage. In 2013-14, AskRegs (as well as NASFAA U) was moved from board-designated funding to NASFAA's operating budget (NASFAA, 2013q), an indicator of the products' sustainability. By 2015-16, AskRegs had grown to over 3,050 published questions and answers with over 276,000 searches (up from 2,521 in 2012-13) (NASFAA 2016).

Both NASFAA U and AskRegs are examples of strategic investments in technology to meet the needs of the Association and its members. Coerver and Byers (2013) identify investing in technology as a vital imperative for associations. (Indeed, NASFAA has a Strategic Technology Investment Fund as part of its board-designated funds.) Utilizing a knowledgebase to replace the Encyclopedia made financial sense for NASFAA (e.g., the costs of updating the knowledgebase would be far cheaper than reprinting a book). It also represented a recognition of how technology was transforming expectations around the consumption of information. Through AskRegs, members have access to the most current guidance on financial aid administration through a self-service portal, incurring no costs in terms of additional staff time. Moreover, questions can be tailored according to individual circumstances, a distinction between AskRegs and the Encyclopedia. And when no answer can be found, members are given clear instructions about how to ask the question of a staff member, who will then help them find the answer. Although AskRegs and NASFAA U are prominent examples of the Association leveraging technology to meet member needs, there are other examples as well, discussed in brief below—specifically the Compliance Engine and *Todays' News*.

#### **Compliance Engine**

Beginning in 2014, NASFAA began to look for ways to streamline the compliance products (e.g., checklists) it provided members. NASFAA felt that the existing products were underutilized by members because they may have been overwhelming to use or they were not aware of them (NASFAA, 2016x). The Association conducted market research to assess the viability of a single product that would combine existing items in the Compliance Toolkit (i.e., the Self-Evaluation Guide and the Policies and Procedures Tool). The web-based

product would be called the Compliance Engine and was first announced to members in 2014 (NASFAA, 2015). In 2015, NASFAA staff, with the approval of the Financial Affairs Committee, sought \$15,000 in board-designated funds to support development of the Compliance Engine (NASFAA, 2015d), which was to be launched in 2016 to coincide with the National Conference. Plans were made to release the Policies and Procedures add-on module in early 2017. The Compliance Engine would allow offices to conduct a series of self-assessments to ensure their compliance with federal regulations around aid administration. The Policies and Procedures add-on (called the P&P Builder), would enable users to create, manage, save, and repurpose their offices' policies and procedures manual year after year, with the ability to update as needed. By 2017, in its annual report, NASFAA noted that, "Since the launch of the Compliance Engine and its P&P Builder module, nearly 1,000 checklists and over 700 policies and procedures manuals have been created," (p. 25). Initially, both tools were offered to all members at no additional cost, although beginning July 1, 2017 only members with the Value Plus Membership package or those who added on a subscription to their membership could access the P&P Builder.

#### Today's News

Since its inception, NASFAA worked as an association to share relevant financial information news with its members (Brooks, 1986). In time, the Association came to publish a newsletter in hard copy format twice monthly for members. With changes in technology and the creation of a NASFAA member website in the 1990s, the decision was made in April 1997 to move the

newsletter entirely online and to publish it on a weekly basis. The final paper copy of the newsletter was published August 8, 1997 (Huff, 2001a). *Today's* News was launched in its place. By 2001 the e-newsletter transitioned to a distribution of five days per week. In October 2013, the Financial Affairs Committee sought \$400,000 for a remake of the NASFAA website, which would include a newsletter re-do and new e-newsletter generating tool (NASFAA, 2013). In 2015 the new website, along with the revamped e-newsletter, were launched. The new *Today's* News used Informz, an email marketing platform, for distribution, allowing the communications team to gather and analyze more data on click rates and readership, as two examples, thereby enabling NASFAA to assess what was valuable to membership (NASFAA, 2016e). In addition to serving as a source of information for NASFAA members, *Today's* News generated advertising revenue for the Association. For example, in the 2015-16 fiscal year *Today's* News generated \$116,000 in ad sales, with over 21,000 subscribers (NASFAA, 2014k).

The changes to *Today's News*, similar to other changes in member services, were not singular events. They came through a process of reflection, analysis, planning, and re-assessment. This is evidenced by the on-going assessment NASFAA conducts on its products and services. For example, in 2017 the NASFAA Board approved the use of \$25,000 to conduct a focus group with members about *Today's News*, with the intent of making improvements as needed (NASFAA, 2017d). Similar efforts were undertaken with NASFAA U as the Association sought feedback about how to improve student experiences in the courses.





# **Pursuing New Revenue Streams and Legitimacy**

"Entrepreneurial" would be an apt descriptor for NASFAA during this period. The Association sought out ways to lower costs, enhance products, and generate new revenue streams. In addition, it was during this period that NASFAA significantly expanded its efforts to pursue philanthropic funding for policy and advocacy work. Funding from philanthropic organizations was not new, however. The Lumina Foundation provided funding to NASFAA for its Sponsored Research Grants Program. Researchers could apply to NASFAA for project funding with awards varying between \$400 and \$4,000. Nelnet and USA Funds also donated to NASFAA. In 2004, NASFAA received a \$50,000 grant from Nelnet to support research on student access (Huff, 2001). Nonetheless, the consistency and scope of grant seeking was unlike what NASAA had done before. Between 2011 and 2017, the Association received almost \$1.7 million in funding from various philanthropic organizations (see Table X for a full listing).

#### Grant Grant Grantor Year **Brief Description** Amount Bill & Melinda 2011 \$125,000 Study on the Using real data from 10 institutions, NASFAA examined the Potential Impact of a **Gates Foundation** impact of the move to PPY by re-running EFCs. Move to PPY (BMGF) BMGF 2012 **Reimagining Aid** Examination of the current systems of student aid with an eye \$93,000 Design & Delivery toward reimagining how they could be improved in the future. (RADD) BMGF 2013 \$44,000 **Reimagining Aid** Paper written in conjunction with four other policy Design & Delivery, organizations, calling on Congress to reform the overly Round II (RADD II) complex repayment process for federal student loans by automatically enrolling all new borrowers in a single incomebased repayment (IBR) plan. **Reimagining Aid** BMGF 2014 Related to employer-based IBR withholding, the paper argued \$30,000 Design & Delivery that automatically enrolling indebted students in IBR, and (RADD) Bonus Round automating repayment through employer payroll withholding, could help to simplify the student loan system for students and radically reduce the number entering default. BMGF 2014 Done prior to the PPY executive order, this paper \$76,500 Reimagining Aid Design & Delivery addressed concerns, considerations, and benefits related to (RADD) Bonus Round implementation of PPY. Law School AccessLex 2015-Studied what consumer information is most vital to students \$125,000 and Consumer 2016 in making informed borrowing decisions about enrollment Information in and completion of law and other graduate and professional programs Components of a BMGF 2015-A study to determine the necessary components of a robust \$355,000 2016 **Robust Federal Work** Federal Work-Study program and to surface innovative Study Program and emerging practices relative to awarding and financing the program. **PPY Implementation** BMGF 2016 Post-executive order announcement, this grant was to help \$80,000 with costs associated with implementation work, including staff time, and the creation, development, and implementation of resources and tools for NASFAA members. 2017-\$214,800 Assisting Displaced Lumina To assist students whose college or career school closed while Students Foundation 2019 they were enrolled or shortly after they withdrew. 2017-Multi-year FAFSA Lumina CAP, NASFAA, and ACCT worked together to analyze the \$20,000 Project Foundation 2018 potential effects of a one-time FAFSA. The Higher Education BMGF 2017-To bring together institutional leaders who view \$524,606

reauthorization as a time to be bold and forward-thinking, with the goal of fostering change and improvement for their students to come together and freely discuss thought-

provoking, innovative ideas.

2018

#### Table X. List of NASFAA Grants from 2011-17

Committee of 50

This pursuit of external funding is reflective of deliberate strategy on the part of NASFAA leadership to pursue ways to support its policy and advocacy work financially. But as Mr. Draeger points out, it was also a strategy to enhance the legitimacy of the organization (J. Drager, Personal Communication). Consider, it was around this time that the Bill & Melinda Gates Foundation increased its strategic philanthropy in higher education (Gose, 2013). NASFAA was a beneficiary of that increased attention from the Gates Foundation, first receiving money in 2011 to simulate a move to prior-prior year as the method for establishing financial need, and then receiving funding an additional seven times. As the largest foundation in the education space, Gates' support of NASFAA's work sent a signal to other funders, policymakers, associations, and members that the Association was doing work that is worth funding. This represents an organizational type of social capital for NASFAA. And although the total grant funding received in any given year represents a small proportion of NASFAA's overall operating budget, the continued support of foundations arguably affords NASFAA a degree of gravitas in higher education policymaking.

# The Policy Landscape and Policy Advocacy

In addition to leading advocacy efforts during this period, NASFAA partnered with other organizations to offer feedback and commentary on policies, most commonly alongside the American Council on Education (ACE) (17 times). Other co-signing organizations include the National Association for College Admission Counseling, the National College Attainment Network, and The Institute for College Access and Success. NASFAA-led task forces included ones for HEA Reauthorization, graduate and professional education aid and debt profiles, and those focusing on issues impacting distribution of aid. As part of negotiated rulemaking, NASFAA advocated for nuanced approaches to gainful employment metrics, tailored to institutional type and degree (NASFAA's Response to Intent to Re-Negotiate Borrower Defenses, 2017).

One of NASFAA's most significant achievements during this time was its efforts to support the PPY and Early FAFSA execution and rollout. The PPY Task Force authored a survey about the preliminary results of these changes in May 2017 to monitor pain points and areas of success (NASFAA Prior Prior-Year Task Force, 2017). Prior to the actual implementation of PPY, NASFAA had issued requests in 2015 to make the Internal Revenue Service's (IRS) Data Retrieval Tool (DRT) even more integrated into the FAFSA and asked that the demo site for the 2017-18 FAFSA be launched even earlier to ensure a smooth launch of the changes (Draeger & NASFAA, 2015). While NASFAA initially offered congratulations in 2016 to the Department of Education (ED) on the Early FAFSA and the PPY (prior-prior year) FAFSA initiative, complimenting them on their advertising of these measures and their attention to student aid accessibility (Draeger & NASFAA, 2016), that perspective shifted due to new ED guidance for the 2017-18 school year.

The highly-debated topic of verification became especially relevant in 2016 and 2017. After the rollout of the PPY and Early FAFSA in 2016, an unexpected outage of the DRT in March hampered users' ability to import data into the FAFSA. Guidance from ED about how to treat the data was not rapidly forthcoming, leaving institutions unsure about the recommended procedure to handle applications, particularly if data discrepancies occurred (Reviewing the FAFSA Data Breach, 2017). Verification procedures under the new system were also unclear to institutions due to guidance from ED that all non-tax filers needed to submit a Verification of Non-Tax Filing (VONF) Letter from the IRS (Draeger et al., 2016). With all of these issues impacting both financial aid applicants and the financial aid staff who needed both time and guidance on how to handle student aid, NASFAA advocated strongly for the restoration of the DRT and requested easing of financial aid processes for low-income families and the staff working to help them at the institutional level (Draeger et al., 2017).

NASFAA authored three one-pagers designed to represent association feedback and to assist association members in their own advocacy efforts; topics covered were the simplification of student loan repayment (NASFAA, 2015), the Higher Education Act Reauthorization (NASFAA, 2016a), and within the reauthorization, the idea of institutional-level and federal risk-sharing (NASFAA, 2016b).



NASFAA's policy advocacy efforts extended to the opinion pages of major outlets. NASFAA President Justin Draeger authored two op-eds during this time period, with one appearing in Forbes that cautioned lawmakers to avoid focusing on the very few students who take on over \$100,000 in loan debt (Drager, 2016). Instead, Draeger encouraged lawmakers to pay attention to the low-income students with comparatively little loan debt who find themselves ill-served by the complex loan systems then in place and in danger of default with little recourse. A second op-ed that appeared in Inside Higher Ed championed the need for distance education programs, such as those offered by Western Governors University, to be eligible for federal aid (Draeger, 2017); this op-ed complemented NASFAA's Innovative Learning Models Task Force's (2015) findings.

Internal research efforts included the yearly National Student Aid Profile, a series of reports on Federal Work-Study, and financial aid administrator surveys on a variety of topics such as administrative burden, as well as a 2012 salary model report and two benchmarking reports in 2016 and 2017. Of course, there was considerable financial aid policy change at the federal level during this period as well, which we discuss next.

Congressional and Department of Education efforts during this time period focused on the tweaking of existing aid programs like the TEACH Grant, which had the percentage of its award amount reduced (Zota, 2019). Other programs like the Perkins Loan Program were eliminated (Congressional Research Service, 2015). Additionally, the ability of for-profit institutions to receive federal aid and the gainful employment rule received close scrutiny (Hegji, 2015).

Restrictions in Ioan eligibility due to federal cost-cutting characterized 2012 in particular. As of July 1, graduate students were unable to qualify for Direct Subsidized Loans (Baum & Payea, 2013), and half of undergraduate Stafford Ioans became unsubsidized as well (Baum & Payea, 2012). Pell Grant eligibility was reduced from a maximum of 18 semesters to 12 (Dortch, 2018). Contrary to cost-saving measures, Ioan rates became more stable for students due to the Bipartisan Loan Certainty Act of 2013, which went into effect in the 2016-17 school year (U.S. Senate Committee on Health, Education, Labor & Pensions, 2016). Direct Loan interest rates became tied to the rate on high-yield 10-year Treasury notes, and max rate caps were put into place for undergraduate Ioans, as well as Direct PLUS, Graduate PLUS, and Parent PLUS Loans.

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# NASFAA TASK FORCE REPORT

### INNOVATIVE LEARNING MODELS

EXPANDING EDUCATIONAL OPPORTUNITIES FOR STUDENTS

<u> 🕅 NASFAA</u>



NASFAA BENCHMARKING REPORT KEY FACTORS THAT IMPACT FINANCIAL AID OFFICE SALARIES, STAFF SIZE, ADMINISTRATIVE CAPACITY, AND CAMPUS RELATIONS

The Department of Education and the legislative branch both exercised closer scrutiny over for-profit educational institutions. After many gainful employment regulations for proprietary institutions were struck down by the United States District Court for the District of Columbia (Hegji, 2015), gainful employment regained the spotlight later on. The abrupt shuttering of the for-profit Corinthian Colleges in April 2015 left students scrambling (Douglas-Gabriel, 2015); the Department of Education had restricted the institution's eligibility for Title IV funds in 2014 (Hegji, 2020). Students negatively impacted by the school closure who did not later enroll in an aid-eligible institution within three years of Corinthian's end were eligible for automatic discharge of their loans (Hegji, 2020). Further, the closure reignited conversations about the eligibility of for-profit institutions for Title IV funds. New Department of Education metrics for eligibility as determined by students' gainful employment rates, originally published in October 2014, went into effect on July 1, 2015 (Hegji, 2015).

The Perkins Loan Program met its end in this time period. It was originally intended to expire at the end of 2014 when the Higher Education Act authorization for Perkins, the Federal Supplemental Educational Opportunity Grant (FSEOG), and Federal Work-Study (FWS) ended (Fountain, 2018). They were all extended through 2015 due to the Continuing Appropriations Act of 2015 (Fountain, 2018). Perkins, however, received temporary reauthorization through the Federal Perkins Loan Extension Act of 2015 that lengthened Perkins loans through September 30, 2017 (Fountain, 2018). Granting of new loans under Perkins ended September 30, 2017 (Federal Student Aid, n.d.-a).

Two new developments that would shape financial aid policy during this time also went into effect. The Public Service Loan Forgiveness Program began accepting applicants as of Fall 2017 (Federal Student Aid, n.d.-b). The prior-prior year FAFSA policy went into effect for the 2017-18 school year (Collins, 2016). While it went into effect in 2018, the Harry W. Colmery Veterans Educational Assistance Act of 2017, also known as the "Forever GI Bill," restored veterans' educational benefits to those negatively impacted by school closures (Hegji, 2020; U.S. Department of Veterans Affairs, n.d.).

# A Golden Anniversary—NASFAA's Coming of Age

On July 9, 2016—a typically warm and humid summer night in Washington, D.C., — past presidents and national chairs, special guests, NASFAA staff, and more gathered together at the National Museum of Natural History for a black-tie gala for the Board of Directors to celebrate the 50th anniversary of the Association with speeches, honors, music, and a look ahead to the next 50 years. The following evening, over 2,500 conference attendees enjoyed a Sunday evening dinner party with food, drink, live music, and party favors.

The celebration of NASFAA's anniversary had begun officially one year earlier, at the 2015 conference in New Orleans, LA, with members marching through the French Quarter, led by a brass band. That year's conference and celebration coincided with the 50th anniversary of the Higher Education Act

of 1965, the landmark piece of federal legislation that gave rise to federal aid programs and—in many ways—gave birth to the

profession of financial aid. The year-long celebration was meant to mark the accomplishments of NASFAA since its inception, as well as reflect on the years to come.

Planning for the celebration began in 2012, with the Anniversary Conference 2016 Planning Committee, co-chaired by NASFAA members Billie Jo Hamilton and Mary Sommers. This committee agreed that a retrospective video celebrating NASFAA through the decades should be made, that the celebration should be a year long, and that a special formal gathering should be held in Washington, D.C., with all living past presidents and the founding members of the association (NASFAA, 2012e). Reflective of the shift from





committees to task forces, a 50th Anniversary Task Force picked up the planning baton formally and in earnest in 2014, at the NASFAA National Conference in Nashville. Chaired by Clantha McCurdy and made up of NASFAA members, including representatives from each of the six regions, the task force was charged with planning and implementing monthly promotional activities at the state and regional level for the yearlong celebration. Meeting monthly via conference call, the group worked with NASFAA staff to collect memorabilia, plan the Board of Directors' Anniversary Gala, identify speakers and guests, and plan the biggest birthday party in the history of the profession (NASFAA, 2015e). Reflective of the importance of the event for the Association, the Board of Directors approved an allocation of nearly \$432,000 in its project development fund for the anniversary (NASFAA, 2016g).





Dan Mann, University of Illinois at Urbana-Champaign, NASFAA National Chair 2015-2016



A HALF CENTURY OPENING DOORS TO EDUCATIONAL OPPORTUNITY

The anniversary was conceptualized as more than a self-congratulatory celebration, as evidenced in a number of ways. First, kicking off celebrations to coincide with the Higher Education Act-which is credited with expanding access to higher education via financial aid-signaled NASFAA's recognition of student aid, especially federal student aid, as vital in helping so many achieve their educational aspirations. As another example, a 50th Anniversary Scholarship was established in 2016 to provide six, one-time scholarships of \$2,750 to a student in each region based on financial need who worked in the field of financial aid. Past presidents and national chairs donated all the funds, displaying principles and beliefs in action. Finally, in its concluding report, the 50th Anniversary Task Force said to the Board, "[The] committee hopes to deliver an anniversary celebration that is exciting, but also speaks to the work of the association's efforts in promoting access to educational opportunities for students across the country, (p.3) (NASFAA, 2015c). For the 2015-16 National Chair Dan Mann, who, as he put it, "...was the lucky person who got to be chair during their 50th Anniversary," (Personal Communication, 2023), the celebration was also symbolic of something deeper about NASFAA's stature as an organization. Mann reflected: "It was a very, very nice evening. So many past presidents came up to me and said things like, 'NASFAA has now come of age,' and they were very proud the Association had evolved to this level," (Mann, Personal Communication). By Mann's account as well as NASFAA's record of accomplishments (e.g., championing prior prior-year's passage), by the time of its golden anniversary, NASFAA's stature had grown among policymakers as well as financial aid professionals. From the "rag-tail" National Student Financial Aid Council founded in 1966 and headed by Allan Purdy (Brooks, 1986), the National Association of Student Financial Aid Administrators had persevered through 50 years of policy change and advocacy, growing into the largest institutional membership higher education association in Washington, D.C., with an operating budget over \$7 million and more than 30 staff members. It established itself as the leading voice for student financial aid and financial aid administrators nationwide, and in many ways had come of age.

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# **Appendix: Timeline of Major Federal Policy Changes**

#### 2012: Re-Election of Barack Obama

- June 30: Many gainful employment regulations for proprietary institutions struck down by DC District Court (Hegji, 2015)
- July 1: Graduate students can't qualify for Direct Subsidized Loans (Baum & Payea, 2013) and about half of undergraduate Stafford loans become unsubsidized (Baum & Payea, 2012)
- 2012-2013 academic year: Lifetime Pell eligibility reduced to 12 semesters (formerly 18) as of due to the 2012 Consolidated Appropriations Act (Dortsch, 2018)
- This year: FAFSA Completion Project expands (Davidson, 2013)

#### 2013: Second Obama Term Begins

- May: TEACH Grant goes through sequestration (automatic reduction to reduce federal deficit) and reduced by a percentage due to Budget Control Act of 2011 (Zota, 2019)
- Bipartisan Student Loan Certainty Act of 2013 signed August 9, 2013
  - o Due to Act, federal student direct loan rates set to financial markets as of July 1, 2013
    - o Specifically, federal government's 10-year borrowing cost or "the yield on the last auction of the U.S. Treasury 10-year Note held before June of each year" (U.S. Senate Committee on Health, Education, Labor & Pensions, para. 7.)
  - o Max rate caps for Direct PLUS, Graduate PLUS, Parent PLUS loans go into effect (Congressional Research Services, n.d.)
- July 1: Direct Subsidized Loans borrowers starting on/after July 1, 2013, can only get these loans for 150% of academic program length (Hegji, 2020)
- October 1-October 16: Government shutdown (U.S. Bureau of Labor Statistics, 2013, para. 1)
- Student debt relief for school closures between November 1, 2013-July 1, 2020 available with certain school closure and no student re-enrollment circumstances (Hegji, 2020)
- Academic Years 2013-2017: HEA statue creates formula to modify annual Pell Grant increase because of inflation (Dortsch, 2018 p. 5)
  - o Amount fixed as of 2017-2018 academic year (Dortsch, 2018)

#### 2014

- July 1: Income-Based Repayment Plan capped at 10% of income ("The Health Care and Education Reconciliation Act of 2010," n.d.)
- October 13: New Department of Ed rules regarding use of performance metrics to measure gainful employment published (Hegji, 2015)
- FSEOG, FWS, and Perkins Loan programs supposed to expire through HEA authorization at end of 2014 (Fountain, 2018)
- Department of Education restricts Title IV Funds to Corinthian Colleges (Hegji, 2020)

#### 2015

- April: Corinthian Colleges shutdown (Douglas-Gabriel, 2015)
- June 2015: Obergefell v. Hodges decided by the Supreme Court, legalizing same-sex marriage (Yoshino, 2015)
- July 1: Department of Education rules regarding requirement of performance metrics provisions for what constitutes gainful employment go into effect (Hegji, 2015)
  - o Department of Education Loan Forgiveness issued in December for affected borrowers (Douglas-Gabriel, 2015)
- September 31-December: New Perkins loans disbursement permissions expire at the institutional level (some exceptions allowed) (Congressional Research Service, 2015)
- December 18: Federal Perkins Loan Extension Act of 2015 passes, allowing for new disbursement of programs until September 30, 2017 (Fountain, 2018)
- Arne Duncan steps down as Secretary of Education; succeeded by John King, Jr. (Filperin et al., 2015)
- FSEOG, FWS, and Perkins Loan programs supposed to expire through HEA authorization at end of 2014. Programs are extended through 2015 under Continuing Appropriations Act, 2015 (Fountain, 2018)
- Second Chance Pell Experiment begins (Dortch & James, 2019)
  - o Allows incarcerated individuals otherwise eligible for Pell to participate in higher education using Pell.
  - o Department of Education made decision under HEA authority.

#### 2016: Election of Donald Trump

• 2016-2017 award year: End of the Quality Assurance program as of 2016-17 award year leading to more centralized verification (Evans et al., 2017)

#### 2017: Trump Presidency begins; DeVos Secretary of Education

- March 2017: IRS Data Retrieval Tool unexpectedly experiences an outage due to data breach, causing delays and conflicting information in FAFSA inclusion (Reviewing the FAFSA data breach, 2017)
- September 30: Expiration of new loans under the Perkins Program (Federal Student Aid, n.d.-a)
- October 1, 2016: Earlier FAFSA release date (Early FAFSA) goes into effect (Collins, 2016)
- Public Service Loan Forgiveness Program: Applications accepted for forgiveness starting Fall 2017 (Federal Student Aid, n.d.-b)
  - o Employment Certification Form introduced in 2012 (Federal Student Aid, n.d.-b)
- Prior-prior FAFSA policy goes into effect for 2017-2018 school year (Collins, 2016)
- "Forever GI Bill" (<u>Harry W. Colmery Veterans Educational Assistance Act of 2017</u>) passed (U.S. Department of Veterans Affairs, n.d.), retroactively giving GI Bill benefits back to those impacted by school closures as of November 14 (Hegji, 2020)
  - o Act goes into effect August 1, 2018