

NASFAA's Off the Cuff Podcast – Episode 148 Transcript

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- Justin Draeger: Hey everyone. Welcome to another edition of Off The Cuff. I'm Justin Draeger.
- Francisco Valines: I'm Francisco Valines, I'm director of financial aid at Florida International University.
- Wayne Kruger: Wayne Kruger, executive director of financial operations at St. Petersburg College.
- Brad Barnett: And I'm Brad Barnett, director of the office of financial aid and scholarships at James Madison University.
- Justin Draeger: Thank you gentlemen for joining me. We're doing a reprise of a special episode we did a couple of weeks ago. In fact, Allie, correct me if I'm wrong here, Allie is producing for us today. Was that our most downloaded episode ever?
- Allie Arcese: It was the most or the second most.
- Justin Draeger: All right, so obviously it was very valuable for our schools. And Lauren Jackson who was on that episode with us from Northwestern State University, she's not able to join us today otherwise we would have had Lauren on, but Brad, you're going to fill her shoes. And we're going to talk just as a reminder to the audience, we've got two four year publics and then we have, Wayne, you're coming at us from community college school. So we're trying to cover all of our bases here to the extent that we can on short notice, so thank you all for joining us. Let's jump right in. Let me just get a lay of the land. Where are each of you and have you received your funding, and have you actually disbursed any emergency grants? Francisco, let's start with you.
- Francisco Valines: Oh yeah. We've gotten our money. We've disbursed about 5 million so far. We're going to post another 4 million today and get that out the door. As of Friday morning, we had gotten just north of 5000 applications. I haven't seen what we did over the weekend yet, so that's been pretty good and we went the application only route. That's the only way you're going to get the funds with us, is to do the application.
- Justin Draeger: Okay. Wayne, how about you? Where are you guys at?
- Wayne Kruger: So as of this morning, we're at 6300 requests. 5300 have already gone out the door for about 2.8 million. We'll probably disburse another million this week.

We took an additional 600 to 800 students from our foundation that had submitted for the emergency aid app. Our emergency aid, our foundation does a great job of raising money, but they basically spent it all and now they're trying to raise some more money. But until then we're taking all the students that are at least Title IV eligible off their hands so that we can pay them. So by the end of this week, we'll be somewhere between 6 and 7000 disbursements for about 4 million of our money.

Justin Draeger: I should have asked this of you too, Francisco, but Wayne, what percentage would you say just off the top of your head, have you disbursed then of your total funding?

Wayne Kruger: As of right now, we're about 50% disbursed. By the end of this week, we'll be close to 70%.

Justin Draeger: Okay. How about you, Francisco?

Francisco Valines: After tonight we'll be about 40% disbursed. We got 19 million so.

Justin Draeger: How about you Brad?

Brad Barnett: Clearly I was asked to be on this podcast to represent the slackers of the institutions across this country because we have disbursed \$0 at this point in time. But our plan is to get a lot of the money awarded this week. We actually just received confirmation from senior leadership last Thursday night on the plan that they wanted us to proceed with. We had presented them with a 17 page report of various options and they got back and said please do this. So now we're frantically trying to put everything together so we can get awards out.

Justin Draeger: So all joking aside, if anybody knows Brad Barnett, he's far from a slacker. So Brad, let me ask you a question. I think there are actually a lot of schools, the latest data we saw last week was that just around, most of the money has been drawn down by schools, but not all of it certainly by a long shot. Are you guys taking a more conservative approach? Is it the decision making, is it the change in guidance? What's causing you to extend your timeline a little longer than maybe some other schools?

Brad Barnett: April 21st, the day that we'll go down and financial aid history. We had a work group here at JMU that came together with that 17 page report and plan to present our leadership on various populations we wanted to target who we thought would have associated expenses and then April 21st, the guidance dropped and that blew everything up and out of the water.

Justin Draeger: That was the guidance that said that students had to be Title IV eligible?

Brad Barnett: Correct. Yeah. And then we took the stance then, emails are furiously going between people at JMU and other schools and et cetera. And we said, "You

know what? It's really early in the game." We needed to give the community a little bit of time to react, have some conversations with ED and potentially members of Congress to see if there would be any leniency on that, backing off of it a little bit. It was such a bomb to drop that we wanted just some time to pass for conversations to happen before we awarded any money.

Justin Draeger: Right. So-

Brad Barnett: We're now at the point where we felt that time has passed and we need to get money out the door.

Justin Draeger: Yeah, so that makes sense to me because you would think student eligibility would be such a key and basic part of this that it might've been mentioned when the certification agreement had dropped. So for it to come out 10 to 12 days later causes you to pause for just a second. So let me go back to Wayne for just a second. Wayne, you talked about focusing on Title IV eligible students. Was that because of the April 21st guidance that was basically like, "They need to be Title IV eligible." So you guys said, "We just need to go forward with people we have FAFSAs on"?

Wayne Kruger: Yeah. Up until April 20th we were preparing to make the application available to every single student at our institution. And then April 21st came, we pivot quickly and added in the FAFSA requirement for now to make sure the students are eligible and meet all that 484 verbiage. But if future guidance comes out, we'll pivot again and make changes as see fit. We just wanted to start getting money out the door as quickly as possible because we knew that the start of the month was coming, students would owe rent, students would owe utility bills, things like that. So we wanted to get money out the door last week.

Justin Draeger: Let's say a student gets their hands on your application link who aren't Title IV eligible, or at least don't have a FAFSA on file. What do you do with them?

Wayne Kruger: We're calling them and it did actually. So we sent the email out to all eligible students that we determined based on querying our student database system. And one of those students thought they were being very helpful and shared it on a Facebook group for Pinellas County that had 40000 members say, "Hey, if you're a St. Pete student, apply for this." So we did get a decent number of applications of students that either don't have a FAFSA application, they're non-degree or non-SAP. We're individually calling all those students to see if we can solve their issue. If it's simply filling out a FAFSA, we can get a quick turnaround. We're keeping their request active until we can maybe solve their issue, get them to apply, do a SAP appeal something like that. So we're trying to handhold any of those students that did get the application that need the money to see if we can get them eligible.

Justin Draeger: And you just alluded to the fact that there might be additional guidance, which we've been talking about now for a while about this idea that students could

self-certify. Francisco, are you guys funding any non-Title IV or, I'm using this a little bit interchangeably, but non-FAFSA filers?

Francisco Valines: We're not, and we have some stats. We had 226 who didn't have a FAFSA who applied through Friday morning and we're contacting them to get them to apply. We had 495 of what we would call non-CARES eligible. That includes the 226 and the rest of those are really our international and undocumented students and we're working with the foundation on those. We also had 49 who applied who it wasn't a COVID thing, so we're working with those in our regular emergency aid process.

Justin Draeger: Let me ask a question to each of you, which is if the department were to come out with a allowance that schools could self-certify and we saw just a glimpse of this in a small bucket of HBCU and specialty schools guidance, this doesn't apply to the emergency grants bucket for now, but it basically said that students could self-certify all the things that they know about. Brad, would you guys go forward with some sort of self-certification for non-Title IV or non-FAFSA filers or is your goal given the money we have, we're going to just focus on the FAFSA filers.

Brad Barnett: That's a great question, Justin. Our plan was originally looking at the entire student body, which meant smaller grants to larger numbers of students. Title IV dropped on us and we changed to the Title IV eligible students and then I was one, it was a big proponent that if ED would come out and allow students to self-certify and hold us harmless for students self-certification and that's the key point. There's got to be something in writing that they will hold us harmless and we don't have to verify anything that the student is certifying then I was more of the mindset of, "Okay we can take self-certification and move forward." I still think that but man there's a part of me that just has a little bit of distrust at this point in time seeing as how ED has flip-flopped on things in the past.

Brad Barnett: Title IV eligible students who meet the section 484 requirements is the most conservative way to go and we're drilling down in the comment codes. I mean it's not just you filled out a FAFSA, it's you filled out a FAFSA and you don't have a comment code that kicks you out of one of those section 484 measures. So it's a lot more than just is there a FAFSA on file. I would have to see what feds tell us if they say you can self-certify before I would really feel comfortable making a decision.

Justin Draeger: Yep. And so for right now you had to rework all of your plans and now you're moving forward with Title IV eligible FAFSA resolved FAFSA filers.

Brad Barnett: Yes, that's exactly what we're doing.

Justin Draeger: Yep. So Wayne, how about you guys? You have this group of students that are not, haven't filed a FAFSA, let's say some can't file a FAFSA or won't. Have you guys thought about a self-certification option?

Wayne Kruger: Yes. Yeah. We already are looking at that in case the guidance comes out. So we're planning ahead there. We like to be ready to pull the trigger if possible. Right now any international students, DACA students, students that we know that would never really even be able to self-certify we're funneling them towards the foundation and hopefully our foundation can assist them with the emergency grant funds from them. But we're going to, if possible, if the feds did give us the ability to do a self-certification and certainly if there was a safe harbor where the school's not held reliable, put it on the student that you're signing a self-certification that's punishable. We would probably go that route. I mean we don't have enough money to go around through all of our students, even just our Title IV eligible students. But we would love to open an app for all of our students because we know that we have a lot of students that are needy that don't necessarily fill out a FASFA. Just because we're low cost doesn't mean that they don't have other expenses that are needed right now.

Justin Draeger: So Francisco and Wayne, I heard you both say you're using a separate application. Brad, how about you guys? Are you going to use a separate application?

Brad Barnett: Yeah, so we have two measures in place. One is we will have an application for appeals because we want to give students the opportunity to individually appeal. But secondly, we are awarding a lot of them in block grants, but it's block grants with the student certifying that they actually have the expense. So it's not an application per se, but we've identified a population of students we think may have expenses, so we're going to offer them an award through their student portal. So it'll be just like if they were accepting a loan or anything along those lines, but it's going to be offered, not accepted. And in everything we send them saying this is offered to you based on the assumption we think you have some of these expenses, if you do then you can accept it. If not, then you need to cancel it. And we're hopeful that's going to be the documentation of the students having the expenses versus an application for everyone.

Justin Draeger: So who are the students that you block granted to? Give me an example of a group that you identified.

Brad Barnett: Yeah, so the group got bigger once we started having more discussions. We were initially looking at students who lost their jobs on campus, not work study jobs because we figured they may have incurred some expenses due to a campus disruption due to COVID related. So it was based on expenses, not on the income, but you could put the two together and figure there's expenses associated with that. So we're looking at all these different groups. And then finally when we were talking to senior leadership they said, "You know what, there's a whole lot of people who are just low middle income who probably have some expenses because we've shut down completely and everybody's going all over the place. So why don't we just pick an EFC threshold and say everyone below that EFC threshold we're going to go out and ask, 'Hey, do you have any specific expenses? And if so then you can accept this grant. If not, then

you can decline the grant." So we really went EFC and just started awarding some block grants or that's what we're doing this week.

Justin Draeger: Yeah. Francisco, how about you? Any block granting or did you guys do a separate application for every student?

Francisco Valines: We're doing an application for every student, not doing the block granting part. And following up on what Brad and Wayne are saying, the safe harbor is really key because one of the things, especially talking to my research and grants people is that this is a federal grant and it falls under A-133 federal grant audit requirements. So we're going to get audited on this when they do the 19/20 audit, which is coming up in the next couple of months. So from my perspective, I don't have safe harbor, I can't go any farther than having an application. So the student attests that they had expenses and doing Title IV kids, that's until we can see that there's something that I can show an auditor, "See, they're safe harbor, I could have them attached." Because if I can do that I will, I'll have them attested for those who don't have a FAFSA.

Justin Draeger: So that's a really great point, Francisco. And I'm curious, have you been in touch with your auditors up until this point?

Francisco Valines: So we have, well our internal audit. In Florida, the state Auditor General audits public institution, so not really worth talking to them at this point. It's more an internal thing to be prepared and be ready.

Justin Draeger: How about you, Wayne? I know you're in Florida as well, but any conversations with your auditors or auditing experts before you guys went out with funds?

Wayne Kruger: Yes, and I mean we certainly talked with our grants and our business office and we talked as a group to determine where the risks were and that's why we ultimately went with the FASFA requirement and Title IV eligible for now. But being that we're a statewide audit, it's hit or miss if your school is going to be audited that year, if they're going to even look at that specifically because they don't necessarily do every school every year or every aspect of every school every year because it's one system audit. So it's really you roll the dice as to what you're going to get pulled every year and what the feds are going to do if they even come in. If you have a program review in the next five or six years, what requirements are they going to look at and things like that. So it's just too much of a gray area for us to worry about it right now. It's do what's right and we'll figure out what went wrong later.

Justin Draeger: Yeah. And if that's a risk your institution is willing to bear, then you have to proceed accordingly. How about you, Brad? Conversations with auditors?

Brad Barnett: Nothing. We're a public institution, so like Florida our state handles our audit and we haven't had any conversations with them at all. Internally, we're proceeding as if this is going to be audited though. I mean, that's the way we're

setting up our procedures. We thought about doing an individual application for every single student, but the volume of just dealing with all those and trying to get money out, we really didn't want to do so we were trying to figure out a way we could leverage our system by still having students opt in that they do have these expenses.

Brad Barnett: I know there are some schools that are just awarding grants on a block grant basis without any sort of confirmation or opt in from the students, they're just identifying populations, saying this population we believe has incurred in expense and we're giving them the money. We didn't feel completely comfortable with that. We wanted the student to at least acknowledge the expense before we actually disbursed any funds, which is why we put that extra step in it for them. We can get awards done faster, but hopefully for auditing purposes they'll take that student acknowledgement of the acceptance.

Justin Draeger: So let me touch on another piece of this. This is the aftermath, but there are reporting requirements with these funds. To date I haven't seen actual templates from any federal agencies that tell you exactly how to report. But I'm curious what you guys are doing now to prepare for these eventual audits that start 30 days after you've completed that, signed that certification agreement. Let's start with you, Francisco.

Francisco Valines: So we actually have scheduling a meeting tomorrow with our compliance, our general counsel, our internal audit and our research folks, our folks in the research office and grants office because it's getting treated like a federal grant, not a Title IV grant. So we're asking them because they get audited every year because we're one of 12 big state university so we get it every year. We can't escape that, that audit happens every year. So altogether we're going to talk about what are the possibilities. I'm pretty confident we can do it. That's one of the reasons we went application. We have recorded that the student said it affected them and they said what expenses they needed it for and then we know how much we gave them. So from my perspective and then we're using COA, totally defensible. From our perspective, we have everything we need, it's just a question of pulling all that data in however they ask it.

Justin Draeger: Yeah. And your intent, Francisco, because I know I've talked to you about this before, your intent is not to share any personally identifiable information when you report and of course we're waiting for these templates or more direction. But that's your intent as of today.

Francisco Valines: That's correct. My general counsel's like, "Yeah, we're not going to even give them a name."

Justin Draeger: How about you, Wayne?

Wayne Kruger: Yeah, I mean we're sort of similar. When we created our form, we created the form with the idea of the form will give us everything that we need from the

students. So it's the student ID numbers so that'd be the non-UIII data that the feds won't get. What they're using it for, what they need it for, what their cost was, and then we can get the data out of our systems. So between the e-form that flows into our system and then querying data, we've already built what we believe will be the template of what they're going to require us to submit. We have the rationale written out of how we chose to award, who we awarded and why, and then we have the student and what they requested it for. So I can't imagine them adding much more than that. But you never know.

Justin Draeger:

Brad, let me ask you a question. This is more of a general question. This has obviously been taking up a significant part of you and your office's time and then you multiply that by the number of people on campus who are also involved in this, maybe all of your time some days and weeks. So I imagine there's a certain amount of you go home at night or you go from your office to your living room, but what is keeping you up? What are the lingering concerns that are circling through your head about these funds?

Brad Barnett:

All of it, Justin. I mean it's funny, I keep an iPad by my bed. Maybe that's good, maybe that's bad, but whatever. I can't tell you how many nights I have woken up in the middle of the night and just couldn't stop thinking about this stuff and just rolled over and grabbed my iPad and started writing notes and taking notes of process stuff or discussions I needed to have on campus or who I needed to talk to or compliance issues potential. I mean it's the whole gambit of there are students who need this money and we're really disappointed to find out we couldn't help some of those and we don't have any other options on our campus to help those non-Title IV eligible students. All of our other institutional emergency aid there's a FASFA component in it as well, their last dollar emergency program. So there's nothing we can do to help them, which is bothersome.

Brad Barnett:

And the other piece of this is, we know like Francisco said, we feel pretty confident this is going to get audited. We want to do it, we want to do it right. Yet the guidance keeps changing and shifting, so eventually you have to award money and then when you've awarded money it's done. It's too late to go undo what you have done. Will it be sufficient? Will it pass? We hope what we've come up with will, but there's still some unknowns out there and that's what keeps me awake.

Justin Draeger:

Yeah. The money comes with strings attached and it doesn't look like all the strings have yet been made known. For some schools, I know part of the risk calculus, we always talk about the two risk calculus that are happening on campus. One is the financial risk, one is a reputational risk. On the financial risk side, some schools take more of a risk because they have other funds that can come in and fill in the gap. If something's found out, then, "Okay, we didn't award them with CARES Act money, we have this other money that we're going to basically swap in or out with it." But for other schools that don't have those funds, and Brad I think this is what you were alluding to, most schools don't

have those types of resources and so it's a one and done. Like, "We did it. It's not like we can pull it back and we don't have other funds to replace it."

Brad Barnett: Yeah, you do it and you hold your breath. Or we could wait forever until the last little bit of guidance comes out about this, but then who are we really serving? At some point we feel like we've waited long enough, at some point there are students who are in need and we just have to award based on the best guidance we have at that time.

Justin Draeger: Right. Wayne, how about you? What's keeping you up at night?

Wayne Kruger: Not having enough money. Based upon, we'll talk about this later probably, but based on the modeling, we only got \$6.8 million for a school of 40,000 students. So what keeps me up is not having enough money to help students in need.

Justin Draeger: Let's talk about that for just a second, because Francisco I think you said you have about 20 million, is that right? And how many students?

Francisco Valines: Just a little over 19.

Justin Draeger: And how many students do you have?

Francisco Valines: 58,000.

Justin Draeger: Okay.

Francisco Valines: Again, and even for FAFSA filers, I'm pushing 45,000 students.

Justin Draeger: Yeah. So, but if you compared Wayne's student population, you said you had 40,000 head count, Wayne?

Wayne Kruger: Yeah, about 40,000.

Justin Draeger: Okay. So that's not an exactly proportional increase, the difference there, Wayne, I assume is because they're doing FTE instead of headcount. Is that the issue?

Wayne Kruger: Correct. Yeah CFT, our average student takes eight hours because their most average age is 28, they're mid-twenties, they're all working, so we have a lot of students that they're working full time and taking two or three classes a semester to try to get through their AA or bachelor's degree. So when you break it down by FTE, we get a lot less funding than our student population needs.

Justin Draeger: And that'd be true probably for almost all open-access schools and especially community colleges who have high numbers of part time students.

Wayne Kruger: Yeah. Yeah.

Justin Draeger: So I wonder the expenses that those students incur, they're probably not that different from the expenses that the full time students incurred. So I think you're highlighting one of the issues here that hopefully if Congress comes back and does this again with another round of funding, I'm assuming you'd say they ought to take a look at that. It ought to be head count, not FTE.

Wayne Kruger: Yeah. I mean, I can understand FTE certainly helps traditionally aged colleges get a lot of funding and I wouldn't want to necessarily, but some kind of FTE versus headcount formula or some kind of mix where it's X amount based on your FTE but then X amount based on your head count as opposed to that. But yeah, because we're given \$500 a student and that we can award about 12,000 students with all of our funds, give or take, 12,800. But that's one third of our student population. And we have a lot of students that are super needy, a lot of middle twenties, most of these are hospitality workers, they're out of jobs now, especially living in Florida, tourism based. So we have a lot of students that are hurting and needing and it keeps me up not having enough to give out to everybody.

Justin Draeger: Francisco?

Francisco Valines: I was going to say they use the IPEDs data from fall '17 I believe to do this. And like Wayne, while I don't have a lot of students who are part time, I have a lot of students who are at that just full time. Our students do 12-12-6 to get their 30 credits. So the vast majority of them are taking 12 credits of that fall. They're not taking 15 so the way IPED defines FTE, even hurts us. We have more Pell recipients than UCF, but because of their size and the pattern, the way their students go, they got more money.

Justin Draeger: Let's say for the sake of argument, Congress is in conversations now about doing additional packages of stimulus that might include very well something along the lines of an additional round of funding. We just touched on that with Wayne for a second. If Congress were to come back and provide additional funding to college students, how would you want this next round done differently than how it's been done so far? Brad, why don't we start with you.

Brad Barnett: Oh man, this is a mess right now. Basically don't do what you did now, that's I guess the first thing to say. I think there was a little bit too much latitude given to the department of education to regulate this and not enough real descriptive language given, although you can debate how descriptive the language was in CARES Act and how much leniency department of ED is taking, but something that would remove all of the gyrations of what we have going on now, just tell us what to do and let's roll with it.

Justin Draeger: Right. So a little more like, "Why didn't Congress just define specifically which students?" If it's-

Brad Barnett: Hopefully if there is more money coming, everyone has learned their lesson from what we've experienced now and the next go round is going to be a lot smoother and a lot more seamless. So that's the first step. And the bigger thing is when this CARES Act first rolled out, collectively as an industry, we were all having these conversations about we think probably one of the biggest areas of need is going to be 2021 with all these people who've lost jobs and won't be able to afford to come back. Well, we know we can't use CARES Act money for that, but if there was any money coming, it would really be great to help the millions and millions of people who have lost jobs and their future of coming back to school is in jeopardy. I'd love to be able to do something like that for them.

Justin Draeger: So really if we're talking about need as opposed to expense, which okay, maybe make an argument that it needed to be for these expenses in this term with so much disruption. Brad, I feel like that begs the question, would you want new money in CARES' emergency grants or would you want more money just in Title IV?

Brad Barnett: Right. Because they're two different things. So CARES is specifically expense, but we know there are needs based on income reductions due to COVID related issues. Just nothing without campus disruption, it's a personal family disruption, but it's still related to the virus. I think and I've gone back around and in my head about would we want more CARES money or we want some increase in Title IV, it almost depends on who you give it to, right? I mean if you say it has to be Title IV aid eligible, then maybe just increasing campus-based funds and relaxing some of the rules and allowing us to do some things to help students would be a more seamless process to go through. If you're saying we can give it to anyone regardless of whether they filled out a FASFA, if Congress comes back and cleans all that up, well then I don't know that campus-based would be the place you want to do that because you have students then who don't have a FASFA on file. So a lot of it almost hinges on who's the population we're trying to help.

Justin Draeger: Right. Wayne, how about you? If Congress comes back-

Wayne Kruger: I would say CARES. I mean I agree that the issue is most of us now are using our money now to help Title IV students. And so if there's students who aren't getting in this first round of money, it's the non-Title IV. And you can separate out DACA and international though I wouldn't, but the students who aren't FASFA filers, the students who are working on credentials that are not degree eligible or things like that, those are kids that still have needs as well. And there's a large populations of those students at community and state colleges and vocational technical training schools that aren't getting money now, that in a second round, if it was open to any student, it'd be better in there. So I would hope it would be CARES funds in some respect or some version of that that was open to more students.

Justin Draeger: How about you, Francisco? What would you change in the next time around?

- Francisco Valines: I pretty much agree with Wayne on this one because we know we have pockets of students who we can't help at all that it would be really great to help. So having those restrictions off would be good. The state of Florida, the state university levels, very restrictive about undocumented students. And while we may have 4 or 500 of them on our campus, we can't spend a penny on them right now including this money. So having Congress open that up would make a big difference for us.
- Brad Barnett: This does go back to Congress though. Congress would have to be very specific on whether you can open it up to everyone or whether it is just Title IV eligible. That's part of what created this mess in the first place is the April 21st interpretation by ED. So it could go either way, but I think Congress is going to drive the ship on this.
- Justin Draeger: Yeah, so I think what I'm hearing you all say is, "Look, if you're going to make these funds only available to Title IV eligible students, then just stick them in the Title IV programs with more latitude or at least strong consideration, it's just like pump up FSEOG and relax the restrictions on who can get it." And if you really mean for these to go to students who are in crisis regardless of their student aid eligibility, then a separate mechanism is appropriate with some additional clarification that all students can in fact receive it.
- Justin Draeger: So Wayne, let me go back to you for just a second and we'll do the rounds, but I'm curious, I think you and Francisco said you're focusing on spending almost all the money it sounds like now. Is that for currently enrolled students? Are you at the end of your term? What are you doing for students that have already left or what are you doing for students in the fall or summer?
- Wayne Kruger: So our spring term ends this week and so the majority of the funding we've done now for students who are enrolled or were enrolled in the spring term. And then we're also taking applications for students that enrolled in summer and we're going to wait. Our summer term starts in a week, so they'll get their funds in a week, we're thinking right around there.
- Wayne Kruger: But our viewpoint is if the student was enrolled as of March 13th and then clearly withdrew because of COVID-19, they were impacted by the campus-based activities. We have nursing students that weren't able to finish their courses because they were clinicals and they had to be in labs or they got moved off and they couldn't do it because it was face to face only. It really couldn't be done online. And students who just, they're essential workers and they had to go pick up extra hours and then they had to pay for their kid's daycare because they're an essential worker and they have costs incurred and then eventually it was choose my job and daycare for my kid or these classes, they chose their family and their job. So to us they were affected if not more, just as much as any other student. And so students that had to withdraw from their courses after March 13th, we took them into consideration for funding.

Justin Draeger: Yeah. You guys I assume did a risk assessment there. The most conservative might say if they are currently enrolled, that might be the most conservative. But you guys have said, "Look, this was passed on March 13th, students were enrolled at that time because there were delays in getting guidance out or delays in getting the funds out. We're not going to hold students accountable or responsible for those delays. And if there's an instance where they were enrolled as of that date and they had that expense that's documented, you'll pay."

Wayne Kruger: Yep. Yeah. We're not talking about massive numbers of students but there are some students, and we've heard from some of those students that it was exceptionally helpful to them right now and that's helping them get through this so that they can come back in summer, come back and fall because they're able to keep their house or keep their job and things like that.

Justin Draeger: Francisco, how about you guys taking a similar track or doing something different?

Francisco Valines: That's very, very similar track. From my perspective, it's like the late disbursement rules at the point the term ended, the student was eligible and they had a valid FAFSA so we can give them the money. The other thing, we also are looking at some students who aren't enrolled this term but are enrolled for summer and we're going to help them also. They've been impacted for lots of different reasons.

Justin Draeger: How about you, Brad?

Brad Barnett: We're taking the same similar stance. If they were enrolled at the time that the disruption occurred, then we're deeming that they are eligible for the funds and we hope we'll have about 80-85% of our money actually awarded this week and then the remaining of it will be left for the individual grants and appeals. And we've told students or we're telling students when we release what we're going to do, that these are for spring 2020 and or summer 2020 expenses that were incurred as a relate of campus disruption due to COVID, et cetera. We're not planning on using any of this money for fall. Our goal is to try to get rid of all of it as quickly as we can for those two terms, knowing that most of it's going to be for spring.

Justin Draeger: All right, I just want to remind folks they can check out all of our resources at nasfaa.org/covid19 including all of our ask regs questions, technical questions about who's eligible for these funds, when can they be used, and it also contains some of our outstanding questions to the department of education. Check out our webinars, those are also available online and free and open to everyone and remember to let other folks know about these resources and these podcasts. We will continue to push out information as we have them. So with that, let me turn to each of you. Wayne, one piece of advice that you'd give institutions who are currently planning?

Wayne Kruger: Get it out. Our college has a big terminology, our president always talks about a community of care and always doing what's right for the students. Help out the students, help out the staff. And so this money is meant to help students now, don't try to save it and tuck it away for next fall or... Yeah, you have a year to spend it but there are just so many students that are in high need right now. Make some decisions, try to force it through and you have to take some institutional risk. You can't just wait for every little bit of guidance to come out, just you have to move it along.

Justin Draeger: Thank you. Francisco?

Francisco Valines: Rely on your network and help your administration understand that you're the expert and that if they just follow the good guidance, they'll be all right.

Justin Draeger: How about you, Brad?

Brad Barnett: Yeah, I agree. We're so used to digging into the rules and the regulations to figure out how to work a program and they're there with everything else. This has been just so ambiguous that it provides an opportunity for a lot of uncertainty and being uncomfortable with what you're doing. But as Francisco and Wayne said, you got to get the money out. Use the best available guidance you have at that point in time. Make sure you can document and justify what you're doing and go help some students.

Justin Draeger: Well, I want to thank each one of you for all that you're doing and taking some time out of your very busy schedules to join us and offer some advice to schools out there and let people know what you're thinking about. Thanks to all of our eight administrators who are out there doing the right thing for their students, managing institutional and reputational and financial risk while still trying to meet all of their students' needs. Thanks for joining us today.