Justin Draeger: 
Hey everyone. Welcome to another edition of Off the Cuff. I’m Justin Draeger. 

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

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

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

Justin Draeger: 
Welcome back everyone. How are you all doing? This is day, I don’t know what, 80 in self isolation. How’s it going? 

Allie Arcese: 
Is it 80? 

Justin Draeger: 
I don’t know. I have no idea. 

Allie Arcese: 
Feels like it. 

Jill Desjean: 
690. 

Allie Arcese: 
I think it’s week seven probably. 

Megan Coval: 
No, it’s like week eight or nine I think. 

Justin Draeger:
I don't know. The office was in, what do we call that? It was code yellow and that was like, "Come in if you want." And then it went to code red overnight, really quickly. And then nobody was allowed in the office anymore. I don't know, it all sort of blends together. All right. I'm going to say something a little, maybe a little controversial. Okay? Because obviously this is terrible, lives lost, et cetera, et cetera. I don't want to minimize that obviously. Being constantly around my family has led to like some, my son Sherman for example, is learning all these piano songs just out of sheer boredom. Just tinkering around. He's playing Coldplay and he's doing the office. I come out of my office at home and I think, "I would never get to hear this if this wasn't happening." It's sort of a sweet moment.

Jill Desjean:
Yeah. My kids are good ages to enjoy being around them. They're not little, little where it's so much work that you have a hard time enjoying them and they're not teenagers, so they don't hate us. And we don't see our kids very much. And Greg, my husband, doesn't see them much at all and he's been home a lot. He was joking with me early on. He's like, "Jill, I've been spending so much time with the kids. They don't even call me mommy anymore."

Justin Draeger:
Out of just habit they're say mom but, yeah.

Jill Desjean:
Just caretaker, "You there. Do something for me." There have been some nice moments with taking walks together...We don't ever do. Yeah. And nice to give up all the extra curriculars and all that nonsense.

Justin Draeger:
Yeah. Allie, you're very active, so I don't know how this is going for you.

Allie Arcese:
I have no children to enjoy.

Justin Draeger:
You can enjoy some of my children. Can I send them?

Allie Arcese:
Sure.

Justin Draeger:
All right. But you're very active. Is this hard because-

Allie Arcese:
I was really unprepared for this because my apartment has a gym and then we also go to a Planet Fitness nearby. And I just was unprepared for how quickly I think it all happened and how suddenly everything closed down. I like to work out a lot and all I had was these little little three pound dumbbells.
Justin Draeger:
You have to do 2000 reps to get a-

Allie Arcese:
Yeah and then we started buying these huge jugs of cat litter, which we'll use eventually, but they weigh 20 pounds. I was like, "This is great." And they have little handles on them. I was using those for a while.

Justin Draeger:
Except when they inevitably tear. And there's cat litter everywhere.

Allie Arcese:
No, they're plastic jugs.

Justin Draeger:
Oh, they're plastic. Oh.

Allie Arcese:
Yeah. And finally yesterday I found on Facebook Marketplace some reasonably priced dumbbells. I mean, they're still way more expensive than they would have been in a store, but none of the stores have any. I went out to get them and in the 20 minutes I was gone of course our wine delivery came that needed to be signed for.

Justin Draeger:
Ouch. Zing.

Megan Coval:
Yeah, that's rough.

Justin Draeger:
I think my hatred of Facebook is pretty well known. I'm not a big fan. That said, the Marketplace obviously, to me, is where everything's happening. Craigslist is long gone. Facebook Marketplace is where, and I found a Bowflex XL. Do you guys remember the old commercials?

Megan Coval:
Yeah.

Allie Arcese:
Yeah.

Justin Draeger:
The Bowflex XL, somebody was giving away for free in my neighborhood. I ran over there, I picked it up. It was in pieces. They didn't say that it wasn't assembled. Again, nights my kids are all home, so my oldest and I, all of a sudden when I put this thing together, I used it for a week and then I sold it yesterday on Facebook Marketplace. It sold in four hours. Yes. I never got the whole TLC shows about
the storage wars, but after yesterday I was riding high. I was like, "Whoa. Think of all the free stuff I could get and then try to sell for literally dollars to people." That might be my future.

Megan Coval:
Secondary gig. Yeah.

Justin Draeger:
All right. We have a lot of things to talk about today in the podcast. We want to talk about the reporting requirements that were just announced last night, so we want to talk about some breaking news out of the IRS about taxability of some of the aid we've been talking about. We want to talk about reporting requirements, the CARES Act grants that came out yesterday. We have some news with the department of education on wage garnishment. We have some things for schools to consider with the OIG ramping up oversight, various aspects of CARES Act and some additional FAFSA data. Before we get to all that, Allie, I think our listener challenge last week was we wanted people to send us their most used emojis. Did we get any takers whatsoever?

Allie Arcese:
We did, yeah. There were quite a few people who tagged us on Twitter with their emojis. Those were fun to look at. There were a lot of the ones, a lot of the face palm emoji, a lot of the shrug emoji, a lot of the sobbing emoji. I think there were a couple wine glasses and beer mugs thrown in there. All relatable sentiments.

Justin Draeger:
Yes, we feel you. You are seen. This week we'll have another listener question at the end of the podcast. Let's dive right into the news, breaking news with the IRS. Megan, you want to catch us up?

Megan Coval:
Yeah. Just this morning the IRS released a Q & A related to emergency grants under the CARE Act and they came out and said specifically that students who receive emergency grants either through the Flexibilities and SEOG program or through the Higher Education Emergency Relief Fund, that it would not count as taxable income. That's good news. We had that question into them and I think both informally and also on the record through some letters with the community. Yeah. I think we all needed a little good news this morning.

Justin Draeger:
All right. Victory.

Megan Coval:
Victory.

Justin Draeger:
That's good news. Just to be clear, this does not impact the fact that these still have to be reported. The CARES Act grant still have to be reported on the 1090 AT right?

Megan Coval:
Right. There’s nothing in here about the 1090 AT. It doesn’t touch that. Yeah.

Justin Draeger:
Okay, so good news there. Let’s continue on. Jill, good news, bad news with the reporting requirements?

Jill Desjean:
Sure. Yeah, ED announced yesterday that schools are going to be reporting fulfilling this 30 day reporting requirement by posting the reporting requirements on their websites, on publicly available websites. Some of the things that schools, it’s a little different from what they had said on April 9th in the certification agreement, the things that they want schools to report there.

Justin Draeger:
Yeah. This seems to me as, I don’t know how significant of a change, but it’s not exactly what everybody was expecting. Now instead of actually turning it in, they have to post it publicly on their website somewhere.

Jill Desjean:
Yeah. It seems like possibly ED just wasn't able to get it together quick enough to be able to develop a reporting structure and so there isn't anywhere for schools to submit through some kind of a portal or something else the to meet the requirement. They said instead, "How about you do this public disclosure of the information that’s going to be required?"

Justin Draeger:
Now, the information that they’re requiring be posted to their website, how does that compare to the information they said would be required in the certification agreement that school signed? Is it different, almost the same?

Jill Desjean:
Some things are the same. There are a handful of new things. They still want schools to report the methods they use to determine who’s eligible to get them, the methods they use to determine how much students would get from these student HERF funds and they want schools to report any instructions, directions, guidance that they gave students about the availability of these funds. But they added that they want the institution to also disclose the total amount of funds that they got or will get from the student share funds, the total amount of grants that they've distributed to students, they want schools to estimate the number of students who might be eligible. Essentially, their number of students who meet the section 484 requirements for student eligibility for Title IV aid and also the total number of students that they have actually made emergency grants to under this fund.

Justin Draeger:
It's the number of Title IV eligible students?

Jill Desjean:
Yeah.

Justin Draeger:
It's just your Title IV students who've received money?

Jill Desjean:
...could get the funds and then who did you give the funds to?

Justin Draeger:
I'm curious, how are they going to calculate that second to last number, the number of people who could have received funds? Because the department has been saying now for a couple of weeks, without written guidance I want to add, that students are going to be able to self-certify that they need these. How is the school going to know this without just counting up FAFSA filers and student aid recipients?

Jill Desjean:
That's how I would do it. It was an estimate. I'm estimating my students who meet the 484 requirements to be the students who filled out FAFSAs, but yeah, with the student self-certification thing, if a school started getting thousands of those in, I think they'd have to add that number to their FAFSA recipients to be accurate.

Justin Draeger:
Okay. The other thing that seemed a little different was the date the clock starts. These are due in 30 days. Originally we had thought that goes back to when? When they signed the agreement and now it's different?

Jill Desjean:
Exactly. Yeah. On the certification and agreement form, they had said that the 30 day report would be from the date they signed the form. And they have since said that they want more updated information and so now it is going to be 30 days from when the institution received their funds.

Justin Draeger:
And we believe that means what? When they were notified that the funds are available to draw down?

Jill Desjean:
We think that's probably going to be when they got their grant award notification that told them the money was available. But I guess the other possibility could be when they first drew down funds from G5, so we have that as a question.

Justin Draeger:
It's probably worth noting this is all aggregated data so they're not turning in any student information. It's just aggregated data, no personally identifiable information and it even goes back to if you have a really small sample size, they wouldn't want you to release data because you might be able to extrapolate what individual students were getting if the sample size is too small, right?

Jill Desjean:
Exactly. Yeah. They get into that a little bit. There's obviously a lot involved in disaggregating data or aggregating data and accounting for small sample sizes, but they do address it in a paragraph at the
bottom of the guidance that says, "Yes, essentially if you have a super small sample size, you may not have to report this."

Justin Draeger:
For any schools that might get a little bit lost in this, there are not two reports. There's not a 30 day report from when you sign the agreement that has to be turned in and now this new 30 day report that has to be posted to your website. There's one report and they restarted the clock to when the funds were available to draw down and that's one report now going on your website not being turned in.

Jill Desjean:
That's what we think. Yeah. ED did say that they're going to have future guidance about the report that goes to them. We think it's really just going to be a duplication of efforts. The school will, at a 30 day point from when they got the funds, no longer from when they signed the certification, they will both update or for the first time post on their website and then report to the department every 45 days thereafter with the, essentially, the same information. The information that's going to ED is actually going to be student by student not aggregated, but other than that, it should be, schools shouldn't have to be doing one thing on June 15th and then a separate thing on June 19th to comply with the two separate dates that that were out there.

Justin Draeger:
On one timeline and it's TBD. Right now it's post to your website, TBD in the future, whether there's a mechanism for them to actually submit this to a federal agency.

Jill Desjean:
Exactly. Yeah.

Justin Draeger:
Okay.

Megan Coval:
I have one question about this. Something that doesn't sit well with me about this, and I want to see if you guys feel the same way, I don't like that you have to put the number of Title IV eligible students or students that could be eligible immediately followed by how many you gave it to. Because, to me, and you just tell me though, if you think I'm being too cynical, but to me that just sets the school up for, "Well, you could have given it to this many and then look at how many you gave it to."

Justin Draeger:
Yeah. Well, I'll tell you what schools should do if they want to make a point, what they should do is put down the number of students they could have given it to if the department of education hadn't come down and said, "This is only for Title IV students." There's no prohibition, Jill, about them adding extra data elements to this report is there?

Jill Desjean:
No, no.
Justin Draeger:

Yeah. If schools want to make a point, maybe what they should say is before the department came out with guidance two weeks after schools had submitted their certification agreement, we could have given it to all students as the secretary had originally encouraged them to do in her cover letter. There's a data element the department didn't ask for that in my mind could it be shared. I hear you, Megan, loudly and clearly.

Megan Coval:

Yeah, that's a great point. If everyone's looking at it and all your students and their families, might as well show them.

Justin Draeger:

Yeah. Let me just add one other thing, which is we have updated our guidance. Our emergency relief fund reference page has been updated with this information and so is our Ask Regs Questions on our website. Allie, maybe we can include that AskRegs link in the show notes. All right, moving on. The department of education facing some additional issues with wage garnishment. Allie, you want to catch us up?

Allie Arcese:

Yeah. Our listeners might recall that way back in March the department announced that it was going to halt wage garnishment for defaulted federal student loan borrowers. And since then the department has come under fire for continuing to allegedly collect on some of these wage garnishments for borrowers since that time and is now being sued by some consumer advocacy groups over that. Part of the issue with this is the employer actually has to halt the collection as well and the department has been saying that we've been notifying employers that they need to do this, they haven't done it. There's this back and forth a little bit of who is really responsible here? Is it more on the employer? More on the department?

Allie Arcese:

The folks that are suing the department are saying that the department has not done enough to directly reach out to all of these employers. That's where we're at and this class action lawsuit that was filed last week, actually, the lead plaintiff is a New York woman who works as a home health aide and she earns just over $12 an hour. She's had her hours reduced since the start of the pandemic and she said she has $10,000 in federal loans and defaulted in December. But in her complaint she said that ED still garnished her wages to pay off her past due loans saying that they seized more than $70 from her paycheck as recently as a week prior.

Justin Draeger:

She's the lead plaintiff, but this is on behalf of all sorts of borrowers, right?

Allie Arcese:

Yes. This is on behalf of over 280,000 borrowers.
It sounds like next steps are, this has to work its way through the legal system. Okay. The other piece of news we received in the last week here, Megan, is several stories reporting that the OIG is going to be doing some additional oversight on all of, I think this is about all the CARES Act funds that are going out, right? Not just student aid but student aid is certainly wrapped up in there. Is that right?

Megan Coval:
Yeah. The OIG, Office of Inspector General came out this week with their plan to provide oversight for all of the education funding. Including the pre-K, K-12 and other stuff and one thing I want to say at the beginning is, I didn't actually realize this until I dug in a little bit, is that I think anytime something like that come out, it causes alarm, understandably. But the CARES Act actually did include specifically $7 million for OIG to provide oversight.

Megan Coval:
This is to be expected and what they did is just laid out a plan for how they plan to do this and what they plan to focus on. And I think for our members, the important thing is that they really talk that their main focus will be on the student portion of the Higher Education Relief Act funds, so not that they won't touch the institutional portion and not that they won't touch some of the other things in the CARES Act like the other waivers and flexibilities that were granted, but I think that will be their main focal point which makes sense due to the amount of money that is involved in that.

Justin Draeger:
That increased oversight, I'm imagining that that may make schools perhaps think through their processes a little bit more, maybe be a bit more conservative, I would think, in how they're giving out aid. We also received a suggestion this last week, or at least a question, Megan, from some schools asking about whether there's been any advocacy work done to try to alleviate, because of everything that's going on, alleviate some of the burden associated with audit requirements and specifically I think asked for relief from their A1 33 audits. Given the report that just came out about the OIG, who's going to be doing oversight here with congressional backing, it seems pretty unlikely that schools would receive any sort of alleviation from their audits, at least in the immediate term. But even getting a stay from having to be audited on the CARES Act funds seems like a pretty tall order given the IG's interest in this.

Megan Coval:
Yeah, I think so. I do think it's a good point that the audit processes is a lot of work and incredibly burdensome for school under normal circumstances. I understand why schools wouldn't ask that question, but there's a big focus and very public focus on accountability here. As you said, it would be a pretty tall order. And one thing something you just said made me think of, that I think is important to remember with the OIGs work is that they will be focusing on institutions and how they distribute these funds, but they're also going to be providing oversight for the department itself. I think that's notable, is that they're going to be watching. How have they done throughout this whole process? What have they been doing to monitor on their end to ensure that the funds are being spent correctly and how have they done with implementation in general? And to that end I think they will be also working with GAO, which will be Government Accountability Office, which will be more focused on watching over how ED will roll out this whole thing and where some of the problems were.

Justin Draeger:
All right, so we'll keep our eyes open and our ears to the ground to see what comes of this, but at least we have information for schools that there will be some oversight on the department of education as much as implementation on the school side. Alright. We have some new data coming out about FAFSA filing. Allie, you want to catch us up?

Allie Arcese:
Yeah. We had an article in today's news today, on Thursday, on some new data that published by NCAN who we work pretty closely with on a number of things, but they have this resource where they collect data on FAFSA completions for high school seniors and renewals for returning students. We reported previously on a decline, a pretty significant decline for high school seniors, FAFSA submissions, and this latest batch of data focused on FAFSA renewals. Back at the end of February, they found that the number of FAFSA renewals for returning students was already down over 2% compared to the previous cycle. And since then that decline has doubled since the start of the pandemic. It's down from this point last year nearly 5%. That turns out to be more than 350,000 returning students who have not submitted a FAFSA renewal.

Justin Draeger:
Yeah. I don't know if this data is available, but do they attribute this, with so many schools shut down for the rest of the school year. I wonder how many seniors rising college freshmen haven't filed a FAFSA because that used to be legitimately part of their curriculum, their senior year. Like, "Okay, file a FAFSA." And in some states it was even required to graduate.

Allie Arcese:
Yeah. We had an article on that a few weeks back when they published data specifically about high school seniors and they were saying that it is due in large part to the fact that schools have shut down for the rest of the year. It's probably part, like you said, it's part of their curriculum. Probably part due to their questioning whether they're going to go to college next year at all. Some of them, especially lower income students, might be focusing on other things like, "Do I need to get a job instead?" And just not focused on completing a FAFSA.

Justin Draeger:
Yeah. It all ties into also what the enrollment picture looks like for the fall. I think I mentioned this maybe on the last podcast, but I was on a call with flagship public universities who were, many of whom were saying their summer enrollments are actually bursting at the seams and postulating about why that might be. But then every other day I see articles in the New York Times, the Washington Post and then of course our trade press, the Chronicle and Inside Higher Ed with very dire prognostications about what fall enrollments look like, decreases as high as 20% which would be pretty significant. We're talking a couple million students at that point. I have no idea what fall looks like, but the FAFSA trends, especially when we know more people are going to be in need because of the recession, FAFSA trends are not going in the right direction. Yeah.

Allie Arcese:
It depends on, like you said, the type of institution you're talking about because it makes sense maybe that local community colleges are just, more commuter schools, would have higher enrollments whereas a state flagship school where you would have to go move on campus, they're probably more
worried about enrollments. Because a lot of students might be thinking they're going to stay closer to home.

Justin Draeger:
Right. Speaking of staying home or moving on to campus, leaving that aside for just a second, it looks like all of our, us on this podcast, we're in Virginia, DC, and Maryland. How are you guys feeling about things opening up potentially next week? Are you feeling anxious? Are you feeling excited? Are you ready?

Jill Desjean:
Why not?

Justin Draeger:
What's that, Allie?

Allie Arcese:
I was going to say, I'm not going to be running out the door to go back to wherever is open. I can survive without getting my hair done. There's more important things to worry about.

Justin Draeger:
I have mixed feelings about it. The other thing I think about is, so Jill and Megan, you guys have younger kids at home. I also feel like school is still out so it and you say like, "Oh, well, okay. Back to normal, everybody." It's sort of like, "Where are the kids going? How is it back to normal?"

Megan Coval:
I was just going to say, to your point, I feel like I can't get truly, I'm like, "Oh great. I can go to a restaurant, but daycare is not open." That's, to your point, how I feel. Like, "Okay, well..." I think that'll be the true getting back to normal for us, even if it's just a couple of days a week.

Justin Draeger:
Yeah. It's hard for me to picture a scenario in the near future where I literally go in and sit down at a restaurant and eat.

Jill Desjean:
That's it. I feel like everything is very much, I just think, "Well, do I need to?" And if the answer is no, I think I won't. I was telling to Greg the other day, I'm to a point where I've been inside for so long. I don't mean inside. I go outside, I do things outdoors, but I haven't been in any establishment in such a long time. I'm very used to it and I'm fine with it and I'm just like, "I need to find a reason to go somewhere. I'm afraid that I'm too used to this now and that I might pick up an agoraphobic.

Justin Draeger:
No, I hear you, man.

Jill Desjean:
Maybe I should force myself to just go do something and be like, "It's okay to do this." Right now, I'm just to the point where I'm like, "If there's nowhere I need to be, I'm not going to go."

Justin Draeger:
I hear you. All right. Our listener question this week, what do we got?

Allie Arcese:
My question that I was thinking about was, once things open up more widely, what is the first place that you want to eat?

Justin Draeger:
Okay. This may sound irresponsible. Well, I don't know. Megan, you like some places that are frowned upon. For people that don't know, Megan is a McDonald's and Taco Bell fan. Megan, I don't mean to out you there, but-

Megan Coval:
It's okay. I went the other day to the drive through.

Justin Draeger:
Well, okay. On that note... The Home Depots and Lowe's are all still open. In fact, the weekends are insane there. Don't go. But I still have, stuff's breaking down around the house occasionally. I have to go buy stuff, but there's a McDonald's right next to the Lowe's that I go to and I pulled in with, I had two of my kids with me. They didn't come into Lowe's, they had to stay in the car and they wear masks and yada yada. But I was like, "Should I go?" I called Diane and I was like, "We're thinking about going through the McDonald's drive through." And she was like, "Don't do it. Don't risk it." We didn't. Last night I was literally just sitting in a chair and, let's face it, McDonald's burgers, they're McDonald's. Okay? I'm not under any illusion, but I was like, "I do miss just the salty"-

Megan Coval:
Yeah. They're good. They're good.

Justin Draeger:
...warm bun, soft. Right. It's not Five Guys. It's not gourmet. It's not Smashburger, it's not whatever hipster place, but yeah, I was like, "You know what? Just a quarter pounder would be, I would be happy with that." That said, Dunkin' Donuts is still open, so I'm not getting the donuts, but they still have drinks there and my kids are jonesing for Chipotle, which is also still open, but I refuse to go to. I refuse to go anywhere.

Megan Coval:
Yeah, that's a little...

Justin Draeger:
...open food and people are walking through. All right. How about you?

Megan Coval:
Did you go?

Justin Draeger:
To McDonald's?

Megan Coval:
You never finished the story. Yeah.

Justin Draeger:
I didn't go. No.

Megan Coval:
Even when you were jonesing the other night at home. Okay. Okay.

Justin Draeger:
No. I have not been. I've not been in two months. Yeah.

Megan Coval:
I will tell you, the drive through, if this helps, they have now a portable chip reader so they hand it out to you, you stick your card in and then when you get your food, they have this big plastic bin and the person has the face mask and gloves and they put all your food in the bin and they hand the bin out. There's no actual, I mean, I get it, that person touched the bag to put it in the bin and all that.

Justin Draeger:
Well, somebody prepared the food. We're going to have to come to grips with that.

Megan Coval:
I know.

Justin Draeger:
I wonder how many times that bin has just been dropped between the window and the car.

Megan Coval:
People lose their fries.

Justin Draeger:
I can barely hang on to the bag. I'm dropping drinks left and right. You saw it at the beginning of the podcast. I just dumped water all over myself. All right, well maybe I'll give it a try, Megan. Maybe you've convinced me. Jill, how about you? What are you looking forward to?

Jill Desjean:
It's not so much the food. There is food there and I do like it, but the experience of, there's this outdoor family-friendly beer garden near my house, or two of them actually. One that Megan ordered from the other day and then another one and we just always meet up with other friends with kids and they have
games and you just, big long tables and you bring your own food or you can order some stuff there and it's just a really nice environment and I do miss that.

Justin Draeger:
As a teetotaler, what is a beer garden? What does it just mean? There's craft breweries around it or...

Allie Arcese:
There's outdoor-

Megan Coval:
It's a bar that's outside.

Justin Draeger:
Oh okay. Okay. All right.

Jill Desjean:
But it's much nicer. I don't like to go to a bar.

Justin Draeger:
Family friendly.

Megan Coval:
Lights strung up outside, people bring their dogs, people bring their kids, there's corn hole, there's music, music, everyone's just friendly and happy. There happens to be alcohol there but people aren't getting drunk. They're just enjoying a nice drink without being jerks about it. There are no TVs with sports on. It's just a very civilized way to enjoy an alcoholic beverage.

Justin Draeger:
Sounds lovely. It also sounds like a Covid hotspot.

Justin Draeger:
I'm just thinking about all the things that get touched and all the kids, but that does sound lovely when we're not in a pandemic. All right, Allie, how about you? What are you looking forward to?

Allie Arcese:
Yeah, mine's similar, just especially with the weather getting nicer. I want to be able to go to, one restaurant that we really like in DC is Morini. It's down on the waterfront by Nats park. I just want to be able to go and eat in the sun right outside on their patio area. Have a drink.

Justin Draeger:
Yes. And all of this reminds me of, you're right, the open air, especially in summer, this is going to be really hard because what I miss are the farmer's markets that were all supposed to open in the last two weeks and none of them are open right now. Those are like outdoor festivals. They usually have live music and yeah. All right, well here's the better days ahead. Send us feedback. You can do it through our
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