

# NASFAA's "Off the Cuff" Podcast - Episode 201 Transcript

Justin:

Welcome everybody to another edition of Off the Cuff. I'm Justin Draeger

Hugh:

I'm Hugh Ferguson with our communications team.

Megan:

I'm Megan Coval with our policy team.

Jill:

And I'm Jill Desjean also with our policy team.

Justin:

Welcome back everybody. I just got back from some vacation. We'll talk about that at the end of the podcast, but for people at home, we're recording a little late today and we were just talking before the podcast about energy levels at the end of the day. The difference between 12 o'clock is when we normally tape, and three o'clock, to me, I was telling Hugh is the difference between noon and midnight. I'm exhausted by three o'clock, for me. I just can't do the three o'clock.

Megan:

You and me both.

Justin:

I have nothing, there's nothing in the tank at three o'clock for me.

Jill:

This isn't my time of day. My brain stops working.

Megan:

I think we're-

Justin:

I could caffeinate-

Megan:

... all morning people, right?

Justin:

I could caffeinate, but that would screw with my bedtime, so it's too risky.

Megan

Honestly. This is, I mean, let's have a real talk about being at home, around this time of day, sometimes the couch is right there, I can do like a 20 minute little... And-

Justin:

Are you saying you napped during the workday?

Megan:

Sometimes.

Jill:

You gave us a nap room in the office, Justin.

Megan:

Thank you, Jill.

Jill:

I took that as permission to nap during the workday.

Justin:

Okay. That's fair, Jill. All right. Yeah, I don't enjoy your logic being thrown right back in, but yes, that is a fair-

Megan:

Are you guys saying you don't?

Justin:

Well, first of all, not only did we have a nap room in the office, Hugh, did you... You've never... I don't know how often you were in the office before you-

Hugh:

I've been in the office once.

Justin:

Did you know we had a nap room?

Hugh:

Maybe I was told this, but it's all a haze.

Justin:

Jill, did you ever nap in the nap room?

Jill:

Absolutely.

Justin:

You did?

Jill:

Yeah, I did a good amount.

Justin:

How could you do it? The hallway was so loud.

Jill:

Oh, pop in headphones and listen to loud but peaceful music or a babbling brook or something.

Justin:

It was a great concept. But in practice it almost felt like the hallway and the kitchen were amplified in that room.

Jill:

I know.

Justin:

It was almost like we were piping it in through a speaker. Yeah.

Megan:

Yeah. It's the location.

Jill:

Well, plus we had the nap rooms down in the gym too, and those were more peaceful.

Justin:

Well, now that's where I was headed, which was, Hugh, did you ever see... There were actually nap pods. Did you see those Hugh before you left?

Hugh:

No, I clearly need to get a more thorough tour next time I'm there.

Justin:

Well, I will just say that the offices are open, but the nap pods are like this sensory experience where you get in and you hit the cycle and you tell the cycle, if I remember, Jill, it's like how long I want to nap or whatever.

Jill:

Yeah. I haven't really figured out how to use it.

Justin:

And then it lowers you back and this thing comes forward and it's lights and it's sound. And it's a whole... The experience, though, is so stimulating that it's hard to nap in it, but it's a lot better than our nap room. In my opinion. So, Megan, you're napping during the day.

Megan:

No, it's not-

Justin:

That's fine. Good on you.

Megan:

But I mean, I feel like I do a little early work sometimes, so-

Justin:

You're an early bird. You are up early.

Megan:

So I clock a little bit, and then take a little nap break.

Justin:

I get up at 6:00, Megan, you're on at 6:00 too. The two of us, maybe somebody from comm, but there's an early crew that just like to get up and log on kind of early.

Megan:

I really like that time of day, in the morning-

Justin:

Yeah. That's what I know to bother you. That's when I know I can get ahold of you.

Megan:

I know when she's here

Justin:

So I get up at 6:00, and then I immediately, "Megan I have 17 things I need to talk to you about immediately."

Megan:

This is when she's most fresh. I can trust [crosstalk 00:03:55]-

Justin:

In my head I'm like, I don't know why Megan so despondent around three o'clock every day, but now I know, that's your nap time.

Megan:

That's my... Yeah, like you said, Jill, you too, it's a coming down for morning people, I think around this time of day.

Justin:

All jokes aside, I'm a 100% pro nap. I think it's evolutionarily built in that we are not supposed to be awake for eight to 10 hours in an office. That's not how we're built.

Megan:

Yeah, see.

Justin:

All right. We've got a lot to catch folks up on. It seems like a frenzy right now, Megan, up on Capitol Hill. It's typical, it's a frenzy, but also things are all tied up in knots. So what's going on with Capitol Hill? Is there funding? Are things happening with student aid? Where we at?

Megan:

Right now the House is focused on their appropriations process for fiscal year '22. And they're going to wrap that up, including the education spending, before they leave, which will be this Friday. They're headed out for August recess. And we covered that bill a couple of weeks ago, but large increases for student aid there, so that'll all kind of be buttoned up. But the Senate is really just kind of kicking off their work now on appropriations, so they're further behind. So all that to say is, we're a while away from fiscal year 2022 spending being tied up.

Justin:

Yeah. And we love August. August is, it's a frenzy time on college campuses with people moving in and classes starting. But in DC, August is like, it gets hot, it gets lethargic. Congress leaves, people go on vacation. How long are the House and Senate going to be gone for this year?

Megan:

So the House is going to be out after tomorrow, Friday, and they're going to be gone through September 20th. That's a long recess.

Justin:

Yeah. What's going on there? Why are they gone for so long?

Megan:

I don't actually know that I've seen a specific reason on that. The only thing I can think is just that they're... I mean, there was a lot of craziness over the past year, pandemic, COVID work, election. And I think maybe a time to kind of reset agenda might be a little slower and more time back in districts. I mean, people are already thinking about midterms.

Justin:

A lot of stuff, I know, is tied up over in the Senate. And if we're being gracious, all snide aside on Congress, there's in-district period. It's not like nothing's happening. They'll be back in district. And it's time to reconnect with your constituents and et cetera, et cetera.

Megan:

Yep. And the Senate, they won't be gone quite as long, but they'll leave around August 9th, I think, and then there they'll come back September 10th. Last year was a total blur, nothing felt normal last year, including I don't think August recess. So yeah, it's a quiet time in the city.

Justin:

Yeah. The Senate is going to have a little bit of a smaller window as you pointed out. They have a lot of things to tackle, including this bipartisan infrastructure bill that has bipartisan support, but doesn't quite have all the support it needs just yet. I mean, there's still conflicting messages in this budget reconciliation bill. But several provisions in there that we're watching, one that came up this last week. One that we've worked with some senators on Senator Chris Van Hollen, in particular, from Maryland, who's looking to maybe extend social security benefits. Jill, you're our resident medical expert. Let me ask you a medical question, because I just can't remember. How long is it that children can now stay on their parents' health insurance? Do you remember?

Jill:

Until 26, if they're a student? I believe.

Justin:

Okay. So it's 26. So it's-

Jill:

Yeah. I'm pretty sure.

Justin:

Yeah. I'm pretty sure too. I think that's right. The reason I thought about that was because this bill sort of gets at that issue. It creates some parity here, the reason that it's 26 is the idea is you graduate high school, you might be pursuing post-secondary education, internships, you're getting sort of this leg up to get into the world before you're on your own. This bill that we've worked with Senator Van Hollen on for a while, and have supported for a while, would basically raise the age cutoff, which is currently 19 years old for children who are receiving social security assistance because of a parent who died or has become disabled. And those amounts generally can account for quite a bit of money, I mean, it's up to \$2,000 a month. And under Van Hollen's bill, it would continue until age 26 for individuals who are enrolled, at least part-time in college.

Justin:

So there is some precedent here. I mean, it's not mirroring obviously, but this idea of extending benefits for students until they have had a chance to complete post-secondary education makes a lot of sense. This is going through the budget committee. He's hoping that it'll make it into budget reconciliation.

Justin:

And there was a little bit of history here that I found sort of interesting for those who are interested, that Senator Sanders is the Chairman of the Budget Committee and he's sort of crafting this huge budget reconciliation bill that will be needed to put all these provisions together and pass with solely democratic support. But about four million kids today in the United States are receiving social security assistance until they graduate high school. And it was only up until 1982, those payments used to continue through college, so this is not necessarily breaking new ground. This is actually restoring something that was thrown out during social security reform during the Reagan administration. So it's restoring a benefit that actually used to exist.

Justin:

So we're fully supportive. We're partnering with other organizations that we aren't normally working with Blue Future and Social Security Works, and, of course, NASFAA are supporting it. So we'll see if this makes it into budget reconciliation along with maybe lots of other higher education or student aid provision. So more to come there.

Megan:

No, I think this is just another good example of how we have predictable things that we work on in organizations, and I feel like our team was commenting sometime recently, Jill, that every now and then we just get into these issues, where like, "Who'd ever thought we'd be talking about social security?" Or there's something else recently where we're like, "Oh, now we're talking about athletics," and I don't know. It's just-

Jill:

Yeah. Pick up little fun facts along the way.

Megan:

It's just financial aid touches everything.

Justin:

Yeah. The tentacles are long and deep. Okay. Hugh, this last week we had some congressional action. There was a Senate Banking Committee, you're going to catch us up here, but I have to ask it at the outset, so Senator Warren, I think, was she chairing this committee hearing?

Hugh:

Yes. This was her a second hearing that she chaired on this very issue this session.

Justin:

Okay. I've been a little bit out of the loop, because I was on vacation, and then we had some strategic retreats at NASFAA this week, but I'm going to make a prediction loan, forgiveness was mentioned and loan services were mentioned. Am I right?

Hugh:

You are very correct.

Justin:

All right. Ding, ding, ding, all right.

Megan:

How did you ever think that that-

Justin:

Well, I feel like we're playing the same song and that song consists of only two notes. So catch me up, what happened during the Banking Committee hearing?

Hugh:

As you said, the two main issues covered were mainly stemming from broad debt cancellation and what that would mean for borrowers and the economy and highlighting a bunch of issues that Warren had with the loan servicers. Another topic that got a decent amount of coverage was the Public Service Loan Forgiveness program, and a lot of the discussion centered around how the department is going to approach the loan moratorium. And the only main new thing is Warren redoubling her efforts on extending the moratorium for a certain amount of time into the future, citing new documents around the perspective of servicers and just the benefits that borrowers have had from this almost 18 months now of non-payments.

Justin:

So a couple of different things here, Hugh, I'm sort of curious, so they talked about... did she specify the amount of time that we should continue the moratorium? Was there a specific time frame thrown around?

Hugh:

She's had a couple of letters in which she's picked more specific dates. I think the longest one was through March, but the main point she was making was that it needs to be extended and that the entire system needs to be reworked before borrowers are put back into their payment plans.

Justin:

So the entire system needs to be reworked, so we're talking what, years?

Hugh:

I mean, it seems like advocate for delay and then try and get the best outcome you can advocate for.

Justin:

If I were to put it another way, are you suggesting that Senator Warren wants loan forgiveness? That's pretty clear, her and Senator Schumer had been pushing on this a lot, but by delaying and saying it needs to be reworked that is a pathway towards getting additional loan forgiveness, because borrowers are continuing to receive payments that are counting towards loan forgiveness, there's no interest, there's no fees, there's no penalties.

Hugh:

It's a very interesting inflection point, because you have this deadline in place and it's not quite clear who's going to take the helm over ending it or extending it or what comes next. So you have everyone advocating for their own agenda items here and it's not-

Justin:

Yeah. It almost feels like at this point it's a... Jill, you speak French, right?

Jill:

A little bit.

Justin:

Okay. So you'll correct-

Jill:

Where are we going with this?

Justin:

... me here, but... Well, I'd you to-

Jill:

I feel like I'm back in-

Justin:

... translate the last 10 minutes. No. The point I was making is, today, it's July 29th, tomorrow's the 30th, this student loan moratorium ends in what? Like 60 days. At this point, it's a fait accompli. Jill, did I say that correctly?

Jill:

Pretty close. Yeah. I wouldn't correct it.

Justin:

Okay. In that, it will be delayed. There is no other alternative at this point. It will be largely delayed or wholly delayed. I mean, I just don't see any alternative to that. We have no plans. Borrowers don't know what the hell is going on. Schools don't know what's going on. I don't know that the servicers know what's going on. So it feels like the delay is inevitable. I don't know if it's a delay of everything or part of it. We've offered up some suggestions to the White House and the Department of Education on trying to create this long on ramp, so that people can start self-selecting back into repayment, but complicating, all of this is, Hugh, and I wonder if this came up yesterday, is what's going on with loan servicing.

Hugh:

With a couple of services exiting the market at the end of the year, there's also the complication around, what happens to all of those borrowers that might have to start repayments in October, and then shift over to a new servicer in the new year?

Justin:

Yeah. Jill, do you want to catch us up a little bit on loan servicing turnover?

Jill:

Yeah. So you might remember a couple weeks ago, FedLoan aka FEEA announced that they were not going to seek renewal of their contract with the Department to service as federal loans, when that expires on December 31st. And just this past week, the New Hampshire Higher Education Association Foundation announced that they also will not seek to renew their contract. So between the two of them, that's about 10 million borrowers that will need to be transitioned to new servicers before the end of the year. And who, potentially, might also be resuming payments at the same time. It's going to be confusing. It's going to be messy.

Justin:

This is a mess.

Megan:

Yeah.

Jill:

Yeah.

Justin:

And so, Jill, if my math is correct, that's one in four borrowers will have a new servicer next year.

Jill:

Yeah. I came up with like one in five, but, yeah, a lot.

Justin:

Okay. So-

Jill:

A significant percentage.

Justin:

... let's say you begin repayment at the end of September, that's really improbable, but let's say it, people all go into repayment. And then in three to four months they have a new servicer, they're transitioned into a new servicer. Well, let's say you give it to the end of the calendar year, right when 20% of borrowers then have to be given a new servicer. Even if you're talking March, while we're having a moratorium, your loan is transferred to a new servicer. So-

Jill:

Yeah, I think of all those people who are on the path to PSLF and are meticulously tracking every single payment, the date it was made, everything, because they can't trust the servicer to track it, and then having that just move. You can't just take all the student data and just move it from one servicer system

to the other, and just assume that it will just seamlessly all just flow in there and nothing will get lost, nothing will get miscounted. But imagine having to argue with a new servicer that the old servicer didn't count your payments correctly when there isn't a record of it.

Justin:

So this is, I have no inside information on this, I should state that pretty explicitly, but here I'm thinking on the servicer, now, I'm one of the remaining servicers, and I'm thinking I'm seeing the potential for a train wreck ahead. And I'm thinking, who wants to be the last person holding the bag when the train comes off the rails? So there's this significant risk for servicers, too, reputational risk, future business risk. And so I do wonder about the cascading effects of servicers just folding and throwing in the towel and saying, "We're done." But, Hugh, it doesn't sound like, necessarily, they got into that level of detail. And I'm wondering, what did Republicans have to say about all of this in the hearing?

Hugh:

Well, interestingly enough, none of the Republican members of the subcommittee offered any questions to the witnesses that were there. It was hard to tell whether or not any Republicans were even at the hearing, but-

Megan:

I was just going to ask that part.

Hugh:

... just by the fact that they didn't ask any questions, kind of indicates how engaged they were. Now, maybe they submitted questions afterwards and got those, but-

Justin:

Or maybe they thought, we've talked about this at nauseum for months, and there's nothing new to say. They can appreciate that Senator Warren is going to beat the drum, but I can also see, this is the last week, we're trying to wrap up a million different things. There's only 50, or excuse me, there's a 100 senators, they're trying to wrap up this infrastructure deal. I don't know.

Justin:

But the other interesting thing about this week is there has been this mounting pressure from congressional Democrats on the Biden administration to do this loan forgiveness. Week after week, it's, "The president can do it with a flick of a pen," this is Senator Schumer's favorite phrase. But wading into the water this week was Speaker Nancy Pelosi, who seemed to side with, maybe, the Biden administration a bit here. Hugh, catch us up on this.

Hugh:

Yeah so just during Speaker Pelosi's weekly press conference, a question was brought up about student loan forgiveness, and she pretty nonchalantly just dismissed the prospect of the executive branch broadly forgiving student loans saying, that they don't have the authority and that it would have to go through Congress. And she went further and almost dismissed broad relief by saying that families with children who don't go to college may not be happy about their tax dollars going towards forgiving other's obligations.

Megan:

I think-

Justin:

I don't know about you all, but, I mean, that was like a mic drop to me.

Jill:

Same.

Justin:

I was like, whoa, where did... that really. Here's my question, Megan, is, was the question... She was very specific. This was not like, let me think off the top of my head. This is a conversation she had clearly thought about. I don't know if the question was planted or not. I don't know if the Speaker was speaking on behalf... getting in front of the administration, buying them some room either. Because this just seemed to all come together in a very concise and explicit way, in her saying, definitively, "No, the administration, of course, cannot do this. And I'm not even sure if we should." Which is pretty loud, when it's coming from the Speaker of the House.

Megan:

Yeah. I feel like if you want to know where the Biden administration is on it, you just heard it from her. I mean, and I don't mean... I feel like I need checked if I'm being too cynical, but there's too much orchestrating that goes on in politics at that level for people to just speak off the cuff like that on an issue that is this hot and has fractured the Democratic party. I just don't believe that she would've said that without some sort of coordination or an okay from the administration.

Justin:

I agree with you. This conversation's been out there for a long time, even going back to the last presidential election, the Speaker's had plenty of opportunities to speak specifically on this topic. And it just so happens the last week that they're in session, the question is asked, and she has a very specific, concise answer about it. It did not seem to me to be an off the cuff, flippant remark. We've seen politicians speak off the cuff, and, I mean, Hugh, you've listened to a lot of folks on the Hill, from your perspective, that seemed locked and loaded and ready to go, didn't it?

Hugh:

Yeah. I mean, it was also interesting that it was coupled with her statements saying that Biden has the authority to postpone and delay payments, which does keep her aligned with Warren and Schumer, and possibly issuing another extension of the payment pause. How long Democrats keep the payment pause for until they start to have a friction between themselves, who's to say.

Justin:

Yeah. Well, we'll see what happens, but, Megan, I'm sort of in your camp. I think, if everybody's wondering where the Biden administration is going to be, I do sort of think, we just sort of-

Megan:

We heard it.

Justin:

... heard it. Somebody just bought somebody's space, here's some room, and now the Biden administration can sort of follow back through with, "We're not sure we have that authority." Let's keep moving here. We'll watch all of that very closely. I want to talk a little bit about something that we talked about earlier with Public Service Loan Forgiveness. Hugh just mentioned that Senator Warren and others have been concerned about PSLF and how we get this all worked out. And it seems like the Department does have some leeway, some leeway in how it's thinking about PSLF and they've solicited feedback. Jill, you want to catch us up?

Jill:

Yeah. So as you know, the Department is planning to conduct Neg Reg this fall and winter, and there'll be addressing regulatory issues around PSLF, but they put out this recent information request asking about the borrower experience with PSLF, and looking for things that they can address that are non-regulatory, so more like operational administration type things. I think like communications, maybe instructions, processing times, things like that. Things that they... I don't want to say little things, but the little things that can add up and really be frustrating and really cause a lot of burden for borrowers as they're trying to pursue this.

Jill:

So they're seeking input from student loan borrowers, policy experts, legal service providers, a bunch of other people. And they ask a series of directed questions that essentially trying to get at, what are those obstacles for borrowers in the PSLF process?

Justin:

Give me some of the questions. What specifically... Because I think it's hard to suss out sometimes unless you are a bureaucrat, what is policy? What is regulatory? And what is operations?

Jill:

Yeah, so they started off big and they're like, what are the effects of student debt on America's public service workforce? And-

Justin:

Okay.

Jill:

... is PSLF an incentive?

Justin:

Can we submit, yeah, here's 10,000 pages on the topic. Okay.

Jill:

Yeah. But then they get into, what features are the most difficult for borrowers to navigate? What role do servicers play in making it easier or harder for borrowers to achieve forgiveness? How can communications about PSLF requirements be improved? Operational steps that department can take to strengthen and better serve public service workers? So they've got 16 questions.

Justin:

Part of me wonders, Jill, can you get into... So this is where it gets a little bit dicey, because they can't change... The whole idea of like, we're going to give you all these loans, then you're going to have to count up 10 years of payments, in the right loan program, with the right servicer and having kept track of various jobs along the way. The construction, is it in itself problematic?

Jill:

Yeah, for sure. Again, these are kind of the little things. Not to say that they're not meaningful, but the problem is, there are problems with the program that need to be fixed. There's little that they can do with these little fixes, but I guess they think every little bit counts. They've received 850 comments, as of this morning, and they're not even due until September 24th.

Megan:

Oh, that's-

Jill:

So they're going to have their work cut out for them.

Justin:

How many of the 850 did you read?

Jill:

I read a handful. One of the really interesting ones that I read that I was like, "They definitely should be able to do something about this." It was a borrower and they used auto debit for their payments and they had multiple loans. And so their payment was applied toward different loans. And when they thought they'd reached 120 payments, they told their servicer, "Hey, I'm at 120." And they said, "Oh, not on all your loans. You've got all these months where you didn't pay the full amount was due." And it was, the payment was off by a penny, because of the way they split up... They took one payment and then the way they applied it to each loan with rounding and whatever, your payment was off by penny, it doesn't count.

Megan:

Oh, man.

Jill:

And I was like, "There's got to be something-

Justin:

I mean, I'd laugh if I didn't cry. I mean, this is-

Megan:

Honestly-

Jill:

No, I laughed. And then I was like, "This isn't funny. This isn't funny at all."

Justin:

Yeah. This is the stuff that makes people want to bang their heads against the wall.

Jill:

Yes. Yeah. I really felt for this person. And I was like, "There's got to be a simple fix for this." This is not regulatory. This is-

Megan:

Clearly.

Jill:

Nobody wanted this to happen.

Justin:

How about a dollar tolerance level? That's like, if you're in the proximity, if you're in the ballpark, we're going to just call it good.

Jill:

Make it five, just to be safe. I mean, come on.

Megan:

Yeah. That's crummy.

Justin:

All right. So we will be submitting comments as well, and we've gone out to our rapid response network. And if our listeners have comments, that's the sort of stuff where, from our perspective, that example you just gave, I mean, we need that sort of stuff.

Jill:

Exactly.

Justin:

We wouldn't know that.

Jill:

Exactly.

Justin:

We can't see that from where we're sitting, but those are the types of stories, with specificity, that we could use from our members and from our listeners, so they can send that into where [policy@nasfaa.org](mailto:policy@nasfaa.org), Jill?

Jill:

Yeah. Yeah.

Justin:

All right. When are comments due?

Jill:

September 24th, so we would want to hear from people probably by early September.

Justin:

Okay. Jill, this last week we joined with ACE and urging some changes to veteran's law that are affecting institutions. Can you help me decipher what's going on here?

Jill:

Yeah. Yeah. So this is a law that becomes effective August 1st. We're calling it Isakson Roe and because it's got a really long title, but Isakson and Roe are both in that title. The way it impacts financial aid offices, primarily, is that it requires institutional disclosure requirements for student veterans, including some on costs and financial aid. And there are a lot of things in there that just aren't achievable for schools to do. One of the things is that schools need to be able to project out the cost for the students, the entire duration of the student's program of study. And there are a handful of other things that people can read the letter to find out about.

Jill:

The thing I'd like to highlight is that NASFAA had the opportunity to engage with VA officials last week and did get some helpful clarification, hopefully, positive news. For one thing, basically it seems... I'll say this to start, we did a lot of reading between the lines. The VA officials were pretty hesitant to commit to things, we asked a couple of times, "Could you put that in writing? That'd be really helpful." And that's not where they're willing to go. They said that "the law is clear. The law is what it is."

Jill:

But they did intimate that they're interpreting this law as simply codification of Principles of Excellence. And so they couldn't come out and say, "If you're compliant with Principles of Excellence, you have nothing to worry about." But they did say, "If you are not compliant with Principles of Excellence, this is going to be the thing that's going to get you into line." So they said, schools should still read the law. Should still talk with their legal counsel and make sure that they feel that they're in compliance with this new law. But I think that schools who are compliant with Principles of Excellence are probably on the right path.

Jill:

Other good news-

Justin:

So we're not necessarily reading this as like, here's an entire list of new requirements.

Jill:

Exactly. Right.

Justin:

This is supposed to represent now a statutory implementation of something that the Obama administration implemented many years ago.

Jill:

Exactly. Yeah. One thing we learned that was a surprise to some of us at NASFAA and according to some other school administrators as well, didn't know about this, we asked about this entire duration of the program. We said, "Oh, well, that wasn't required by Principles of excellence because the college financing plan satisfied that requirement." And VA said, "Actually, they've always interpreted both Principles of Excellence and now Isakson Roe as requiring schools to disclose an estimate of the total costs of the student's program, however long that might be." So that is definitely something that schools probably haven't been doing, even if they're compliant with Principles of Excellence and should be getting on.

Justin:

The keyword I want to focus on there is, estimates. So you are estimating based on factors that aren't really known at the time you're doing estimate, so I assume there's leeway there?

Jill:

Yeah. I mean, over all the conversation sounded like this is not... the VA and the state approving agencies, aren't out to get schools. This isn't going to be, "Aha, you were off by one percent on next year's tuition." But specifically, with respect to these estimates, they said, "If someone knows, if there's something in your state statute that says that you're a public institution and your tuition goes up three percent every year, your estimate should show a three percent increase for each of years the student is in the program. You're not compliant if it doesn't." But if you're basing your estimates on something reasonable, based on the information that you have at the time you make the estimate, it didn't seem like that was something that they were going to try to ding schools.

Justin:

So this is another example of write down your methodology, make sure your methodology make some sense, and then follow your methodology.

Jill:

Yeah. And probably work with legal counsel to develop some disclaimer language too. Because I think a lot of the time, the reason a school wouldn't choose to try to project out their tuition for the duration of a program is because they would be afraid of being accused of misrepresenting. And so-

Justin:

This is based on information we know today and certain assumptions and... Right.

Jill:

Yeah. Yeah.

Justin:

Okay. We put an article in today's news about this.

Jill:

We did. Yes. So we had one last week that talked about the August 1st deadline, which I'll just mention again, the deadline for compliance and also the deadline for a waiver. So school certifying officials got emails about the waiver process and conditions that were eligible for a waiver. So yeah, we did that. And then on, I believe, it was, I think Monday or Tuesday, we also published an article about the clarification's that we got from VA.

Justin:

Okay. And we can link to those in the show notes, so people have them. Great. Thanks very much, Jill. We are headed into our August recess, as Megan talked about earlier. Summer vacation plans are alive and well at NASFAA. I'm curious before we... And for folks who don't know, the podcast usually goes on hiatus for the next month while Congress is out, we might have a special episode here or there. Certainly we'll cover anything that's breaking, knock on wood, there won't be anything breaking. But summer plans, what do we got cooking this summer? Let's start with you, Jill. Where are you guys headed?

Jill:

All kinds of the places. Next week, we're dropping the kids off with my parents, and then-

Justin:

Oh, I already like where this was heading. Done, sealed, yes.

Jill:

And then Greg and I are going to do some hiking in Vermont and New Hampshire.

Justin:

Are you doing the Appalachian trail up there?

Jill:

We're doing sections of it, yeah. But we're not going to do any backpacking or anything. So just-

Justin:

Oh, good for you.

Jill:

Yeah. Just a little day hiking.

Megan:

That'll be so nice.

Justin:

I don't know what it's like in Vermont, in August. Is it-

Jill:

Oh, it's delightful.

Justin:

Is it really?

Jill:

Yeah.

Justin:

Is it?

Jill:

It's really nice.

Justin:

Okay, so it's not like down here where it's a swampy-

Jill:

No.

Justin:

... soupy mess.

Jill:

No. No, no. Mosquitoes, but at night, not during the day like we have down here. Yeah. And, obviously, significantly cooler. You get humidity in the Northeast, but it's not like here.

Megan:

No.

Justin:

I can't remember is Greg from up in the Northeast as well?

Jill:

He's from New Jersey.

Justin:

Oh, okay.

Jill:

So our next vacation after that is the Jersey Shore to honor both of our backgrounds.

Justin:

Yeah. Right.

Jill:

Yeah.

Justin:

All right. Well, I hope you have a great month hiking around, and we'll be sure to check in with you along the way. All right, Megan, how about you?

Megan:

We're kind of just hanging around in August. We'll probably do day trip type things, but we went away-

Justin:

You guys already did a beach thing this year.

Megan:

Yeah. We went away a couple of weeks ago to Rehoboth, which was really nice. We had a place on the boardwalk and right-

Justin:

I know that you love politics so much, so did you choose Rehoboth because the Bidens are... that's like their weekend place or-

Megan:

Not at all? No, I'm just kidding.

Justin:

Seriously.

Megan:

Well, we've gotten to Rehoboth before. We're sort of the Delaware beach family. We hop around between Bethany and Rehoboth.

Justin:

Yeah. You and the Bidens, uh-huh (affirmative).

Megan:

Yeah. You know. But it was great. We went with my parents and Nick's parents, so we had all of us. We had-

Justin:

Whoa, whoa, whoa, wait, this is... Hugh, do we have a soundtrack feature where it's like-

Hugh:  
Brakes.

Justin:  
... the brakes are... So you took both of your parents-

Megan:  
Yeah.

Justin:  
... simultaneously, on this trip.

Megan:  
This is the fourth, third or fourth year we've done that.

Justin:  
I'm trying to wrap my mind around this for just a second. So your in-laws were there and Nick's in-laws were there.

Megan:  
Mm-hmm (affirmative).

Justin:  
So there were one, two, three, four, there were six adults. There was a one to three adult ratio for adults to children.

Megan:  
Yeah. Six adults, two kids. I mean, it worked out well. We had a couple of nights out. Yeah. They get along, and you know what the best part is, is that it's a group that does not feel like they have to do everything at the same time. I feel like I've been on some group vacations where people feel like you have to make.. Everyone's going to dinner, and we're going here, and this time, and people would be like, "Ah," you know?

Justin:  
Yeah.

Megan:  
I noticed by the end of the week, even the grandparents were like, "We're just going to go out. We're going to grab something a little early by ourselves. We love you guys. But dinner with kids for five days in a row, we're going to go try that place down the street." So it was really great. And I think, we hadn't been there, to the beach, in three years, because two years ago I was very pregnant at the time. So it was fun to see the kids older with the beach and they just kind of amazement of it, and it was really nice.

Justin:

How about you, Hugh?

Hugh:

Yeah. So pretty hangful. I'm fortunate enough to be based by a beach right now on the Jersey Shore. So I've just been making my way up there. The big thing I need to work on is, I've noticed I picked up a really bad sock tan line, which I have not had in a very long time. So hopefully, in the next couple of weeks, I can remedy that and just get to keep enjoying the outdoors.

Justin:

Hugh, how many pairs of Birkenstocks do you have?

Hugh:

I do not have a good sandal, so I really need shoe advice.

Justin:

Well, this is why I ask. Yeah, because my son bought a pair of Crocs for our beach vacation, and I tried on a pair and I was like, "Oh, these are comfortable." And my wife and daughter were like, "Ah, we're going to go ahead and... You're not going to do Crocs in your 40s. Let's go ahead and... Birkenstocks are the way to go." Which I guess are Crocs, but maybe a cooler version of them.

Hugh:

I guess so. I mean, there are some, you have to be careful because they can't get wet. So it's like-

Justin:

Oh, like the leather ones.

Megan:

That's what I thought about, yeah. Yeah.

Justin:

We just did a beach vacation, and I love... I feel like when I qualify by saying, I love my kids, that the next things are going to be terrible. But I love my kids, and I loved all their ages. Obviously, there's cuteness at the age your kids are Jill and Meghan. But my favorite ages has really been when my kids are high schoolers, because their senses of humor are developed. They're saying funny things. They are funny. They're genuinely funny. As much as I love little kids, most of what they say is not interesting and not funny. That's not me. Do you know that show where it's like, The Kids Say the Darndest Things? There was an old one and now there's a new one. I don't find that show at all enjoyable. I find most of the things that kids say not entertaining. I don't know why.

Megan:

Do you hate rainbows?

Justin:

I think because I'm only child, and I grew up with adults, but I just don't find it funny. But two of my three kids are of that age, they're hilarious. We did this vacation and it's sort of like when I see the crazy going on around me, this is my favorite thing. Megan, we've talked about, people watching is my favorite, because I see all the crazy. We were at the Outer Banks in Rodanthe and a guy walked in while we were at the register. He brought in a kite, and he-

Megan:

Were you at a restaurant. I need this context, where were you?

Justin:

At a restaurant?

Megan:

Where were you?

Justin:

No, we were just at one of those surf shops, that dot the-

Megan:

Yeah.

Justin:

And he came in with a kite and he laid it down. And first of all, I don't even know that he noticed that there was a line. He kind of just... This was like the embodiment of entitlement. So he kind of walks in and he's like, "I need to return this kite." And the guy's... Most of the people at the surf shop... So all the type A's from DC go out to the beach and all these people who live on the coast who are not type A are like, "I'm already put off, by the way you walked into this store." And he's like, "I'm sorry. Do you have a receipt man?" And he's like, "No, I don't have a receipt. I bought it here." And then he said, "I flew the kite and it only flew in one direction."

Justin:

And so this is where, if I had little kids, nobody would enjoy this conversation and how absurd it is. But I turned around and my daughter's there. And she's like, "Don't kites just flying one direct?" And I was like, "Yeah." And so, then-

Jill:

Oh, my God.

Justin:

... he's like, "Let me get my manager." So the manager comes over and she's like, "You don't have receipt?" He's like, "No. And I just want to exchange it. I don't want money back. I want to exchange." So she looks at it and she's like, "You bought this at another store." Literally, the brand name of the kite is this other store. And then she took it and just went and woot, flung it off the counter.

Justin:

And the guy was clearly in the wrong. And so this whole crazy thing unfolded and my teenagers were there to enjoy it with me. And so that to me is the pinnacle of, we're out of the bumpy middle school years. Now I can enjoy my kids for actually being humans. Again, loved them at the young age, but it's just new territory. Anyway, we're going to be around all August. So Jill, you enjoy your hiking, and Hugh you enjoy your Birkenstocks, and Megan, you're going to be around too, right?

Megan:

Yeah. I'm going to use a new word I just learned from Hugh that we hope to have a hangful August. Did you say hangful? I love that. Is that what you said? You're a hangful time.

Justin:

What does that mean?

Hugh:

Hangful?

Megan:

Or did I-

Hugh:

Just like chilling out, relaxing.

Megan:

Yeah, when you said that I was like, that's nice. I like that.

Justin:

All right. I'll go with that.

Megan:

You're going to have a hangful August.

Justin:

I love being in DC in August. The weather's terrible, it's oppressive, but the city is so enjoyable because nobody's here. You can enjoy all this infrastructure and there's just no tourists. There's no Congress. It's lovely.

Justin:

Hey, thank you for joining us for another edition of Off the Cuff. Send us your summer plans, let us know what you're doing, and let us know how enrollments are shaping up and doing this fall. We might be back for a special episode, otherwise, we'll see you on the other side of the August congressional recess. Stay well, everybody stay healthy.