

# NASFAA's "Off the Cuff" Podcast – Episode 235 Transcript

OTC Ask Regs Experts: FAFSA Updates and Pell Recalculation Dates

Justin Draeger:

Hey everyone. Welcome to another addition of Off The Cuff. I'm Justin Draeger.

Jill Desjean:

I'm Jill Desjean with NASFAA's policy team.

David Tolman:

And I'm David Tolman with training and regulatory assistance.

Justin Draeger:

Welcome, Jill and David. It's great to see you both again. Jill, I noticed you've taken to blurring out your background. And David, I want know how curated your shelf is behind you, because I don't ever remember seeing that particular shelf in any virtual meeting I've been in with you before.

David Tolman:

That's probably because I don't have a background today. This is my actual background.

Justin Draeger:

This is ground central. This is where you are working from.

David Tolman:

This is it.

Justin Draeger:

And how curated is that?

David Tolman:

It's just a collection of do-dads that I've gotten over the years. There's Wallace and Grommet, Opus, Captain Ice Cream Cone.

Justin Draeger:

Ice Cream Cone.

David Tolman:

There's a lot to keep me busy during this podcast while you're talking about very intricate and important...

Justin Draeger:

And important, yes.

David Tolman:

... Regulations today.

Justin Draeger:

Yes.

David Tolman:

Okay. And Jill, why the switch? What happened in the last two weeks, where now you're blurring out your background? What's going on?

Jill Desjean:

I don't know that things have have gotten that much worse.

Justin Draeger:

Jill, are you okay?

Jill Desjean:

I'm okay.

Justin Draeger:

Just blink twice if you're okay.

Jill Desjean:

I was somewhat horrified. I forgot in the platform that we use for webinars, there is no blur option. Or I think there is an option, but you're not supposed to use it, because... I don't know. And I could see my background and I was horrified.

Jill Desjean:

So when we were in the prep part of it, I had my husband come in, and I'm like, "Just neaten up that bookshelf." I'm like, "People are going to be able to see me." And then Melanie from Ed logged in from McDonald's. And I was like, "Well, I guess this is fine then."

Justin Draeger:

Yeah, last week at the virtual conference, if you missed it, one of the Department of ED people graciously joined us, even though she was traveling, but from a McDonald's, which is very risky, for a lot of reasons

Jill Desjean:

How she did that, I will never understand.

Justin Draeger:

Well, it's interesting, because I was flying out of town on the day of the last session. And so I didn't get to come into the office because I had to go to the airport like 15 minutes after this session was over.

Justin Draeger:

So I almost never take webinars at home. I always like to come into the office. There's just too much unpredictability at my house. And we can't use the canned backgrounds in the webinar platform, as you point out.

Justin Draeger:

So I think like 90% of my stress that day was literally, "Where am I going to set up this camera? Which part of my house is presentable?" And I don't know. Even at the last minute I was moving. So anyway.

Justin Draeger:

Well, I've seen most of your house Jill, just via virtual meeting. So I just wanted make sure you're okay with the blurred background.

Jill Desjean:

I'm good.

Justin Draeger:

You're good.

Jill Desjean:

Yeah. It's just a children's library behind me.

Justin Draeger:

That's all right. Well, we have two very interesting topics I want to dive into today. Jill, I want to start with you, because I think there's a lot going on, just in terms of our members' minds, and trying to keep straight everything that's going on between the '23-24 FAFSA, the '24-25 FAFSA.

Justin Draeger:

And then we're going to throw on top of that a lot of conversation I saw in various list serves and communities over the last two weeks, about 390 codes.

Justin Draeger:

So let me stop by starting, and ask, what are the big changes for the '23-24 FAFSA that's coming just this next year?

Jill Desjean:

So just to tee that up, since we are talking about so many changes coming, the really big changes that are related to FAFSA simplification itself are not happening next year. They're happening the year after. They're happening in '24-25.

Jill Desjean:

The department is not working on that FAFSA yet, they're working on the '23-24 FAFSA, which will be open October 1st of this year. And there are still some significant changes, nothing like what we're going to see in '24-25, but still some pretty significant ones.

Jill Desjean:

You'll remember that the FAFSA Simplification Act was supposed to be implemented next year, but Congress pushed it back to '24-25.

Jill Desjean:

So moving on to just this year, one thing that Congress did authorize for early implementation was the ban on Title-IV eligibility for students with prior drug convictions, and for students who failed to register with selective service.

Jill Desjean:

And so the Department of ED did choose to early implement those provisions. And they've been in place now since last summer. I think it was around this time, or June of last summer, that they partially implemented them.

Jill Desjean:

But of course, ED can't just up and change the FAFSA quickly, and so it's been a phased implementation. And '23-24 marks the final phase. The FAFSA questions related to drug convictions and selective service will be removed from the FAFSA entirely for the '23-24 FAFSA.

Justin Draeger:

Okay. So last year the questions remained. Schools had to sort it out.

Jill Desjean:

Exactly.

Justin Draeger:

This year the questions go.

Jill Desjean:

Exactly.

Justin Draeger:

What does that mean for the gender question, male and female? There are implications there?

Jill Desjean:

There are, yeah. So very weedy, I guess, but very much of interest. So the question on the FAFSA that lets the Department of ED figure out whether you need to register with selective service asks, are you male or female?

Jill Desjean:

And if you answer male, then they know that you have to be registered with selective service. They either conduct a match, or if the match fails, they offer you the opportunity to register via the FAFSA.

Jill Desjean:

That question is exclusively tied to the selective service registration requirement. And so the department deemed that that question was no longer necessary on the FAFSA for '23-24, because you don't have to be registered with selective service.

Justin Draeger:

So it seems like there's a conflict here, because Congress did want the department to ask students their sex on the FAFSA. So they're removing this question and then doing something else?

Jill Desjean:

Right. So, if FAFSA Simplification Act had been implemented on time for '23-24, there'd be no gap in data on students' sex, because the next year's FAFSA would have a new question. They wouldn't ask anymore, are you male or female? They would ask it, presumably, in a different way, because it's for a different purpose.

Jill Desjean:

But because implementation has now been delayed til '24-25, we have this one year where there's no indication of what the student's sex and/or gender are on the FAFSA.

Justin Draeger:

And do we like that or don't like that?

Jill Desjean:

Well, it's complicated. Some schools actually use that question to match ISIR records into their own systems. There has to be some kind of quality control so that you're not matching Bob Smith's FAFSA from Ohio with Bob Smith's FAFSA from Iowa, or something like that.

Jill Desjean:

And so usually schools have a handful of demographic criteria that they use to ensure that the person who's ISIR they're matching to their institutional system is the right person.

Jill Desjean:

Some schools do use that question. So it's not the end of the world, but it certainly does mean that they're now going to have to find another identifier to match, which is just work, and probably work that can't just be done in the financial aid office.

Jill Desjean:

So they might need other resources outside of financial aid office, which might be hard to corral, or just take time and money that schools don't have.

Justin Draeger:

And we touched on some of this in our FAFSA comments, which you took the lead on drafting, Jill. And people can read that in our show notes. But in a nutshell, we made some comments about this. Did the department listen? What are they proposing to do next year?

Jill Desjean:

So for next year, instead of having a question on the FAFSA, an actual data element, they're doing this optional survey. So from the student's point of view, they will be still completing the FAFSA. The survey pops up before they sign the FAFSA. So it's kind of part of the FAFSA, but it's not technically part of the FAFSA. It's optional.

Jill Desjean:

And they're asking four new questions that are sort of in preparation of full implementation of the FAFSA simplification act in '24-25, when they'll be required to ask questions, not only about a students' sex, but also about their race.

Justin Draeger:

So it's going to be an optional survey question. From the student experience, it probably won't appear that it's necessarily all that different from the FAFSA. But I assume, given that it's 2022, we're asking more than just, are you male or female? So what are the questions...

Jill Desjean:

That's right.

Justin Draeger:

... The department will be asking?

Jill Desjean:

So they will ask students, what is your gender? And they'll give them some options. They also ask specifically, are you transgender? What is your race? And, what is your ethnicity?

Justin Draeger:

And if a student decides to answer none of these questions, it won't hold up the FAFSA. These are not required, right?

Jill Desjean:

That's right. The student is going to be told that their answers to these questions will not factor into their eligibility. And they'll also be told that the questions are optional, so they can choose not to answer them.

Jill Desjean:

And I think ED's using this as a dry run of '24-25, when they have to have these questions, to make sure they're asking them the right way, to get feedback from people, to see how many people actually answer these questions, and what they can do to make sure that they're asking them properly in '24-25, when they become an official part of the FAFSA.

Justin Draeger:

So one of the challenges you outlined, Jill, was that some of the schools are using this data to help match up students... Bob Smith or whoever... With common names, that all might be lumped together.

Justin Draeger:

But it I remember, during the initial FAFSA comment period, we heard from a few schools that said, "I don't want this data. This is not necessarily data that I want, because I don't know what my school will do with this sort of data."

Justin Draeger:

So we do have schools that have differing opinions on this. But what is the department proposing to do? Are they going to share any of this data back with schools?

Jill Desjean:

Our understanding right now, with the survey question, is that schools will not see this data. And so another thing that we recommended that ED do for next year is just to make very clear... They see now that it won't factor into your eligibility, but we wanted them to be even more clear, and to say, "Your school will not have access to this data."

Jill Desjean:

Because schools just don't want to even give the slightest impression to students that the way that they answer these questions could in any way affect their ability to be admitted to the school, their ability to receive any types of financial aid, or just be used in any kind of a way that could affect the student.

Justin Draeger:

Yeah. I know we are working on comments right now. The department is accepting comments on this optional survey, that they're proposing by August 12th?

Jill Desjean:

That's right.

Justin Draeger:

So Jill, if people have thoughts or comments about this, where should they send them?

Jill Desjean:

To [policy@nasfa.org](mailto:policy@nasfa.org).

Justin Draeger:

Okay. And Jill, you're running lead on these comments again, so people can submit them that way. And if we have additional questions, we can follow up.

Justin Draeger:

Let me turn over to the selective service for just a moment, because I'm hearing a lot about 390 error codes, which I think tie into selective service. What's going on here?

Jill Desjean:

Yeah. So this is a bit of a mess. I don't need to be saying this to the people who are listening, because they're actually experiencing it. And this is for the '22-23 FAFSA. So not the FAFSAs we're thinking about, but the one that's actually being used right now.

Jill Desjean:

So what happened is that the Department of Education's authority to conduct the selective service registration match just recently expired. As part of this phased implementation where selective service registration isn't required for eligibility, their authority actually expired.

Jill Desjean:

And so that match is not being conducted. And it means that FAFSA's ISIRs that come to schools, that haven't had the match completed, show up with this error code. It's error code 390.

Jill Desjean:

And the problem is that the error message is actually associated with any match not being completed. So if the citizenship match with the social security administration didn't go through, that would be error code 390. If the selective service match didn't go through, that's error code 390.

Jill Desjean:

So it's not just an obvious thing, where the school can just see error code 390 and ignore it. They actually have to manually look at the student's ISIR. Figure out which match wasn't completed.

Jill Desjean:

If it was selective service, no problem. That's fine. But if it was something else, they need to resolve it. The resolution is fine. That's always been the case. But this manual looking at every single 390 code to figure out whether resolution is needed or not can be pretty tedious and burdensome for schools.

Justin Draeger:

So to make sure I got this right, this is really an expiration between two federal agencies.

Jill Desjean:

That's right.

Justin Draeger:

They used to have this agreement where the Department of Education would take FAFSA data, send it over to another federal agency where it was matched. But because that agreement's not in place, they're all coming back error-ed out. And that error code can encompass all sorts of different issues related to a citizenship or data match...

Jill Desjean:

Exactly.

Justin Draeger:

... Not just selective service. But most of these are probably selective service, and the school has to look at each one.

Jill Desjean:

Right.

Justin Draeger:

I imagine, for a lot of schools who've already got their FAFSAs in the door, this is not a big deal, but for all the open access schools who are in peak, who also happen to be, often, our least resourced schools, this is a really big deal.

Jill Desjean:

Big deal. Yeah. There's also an issue with states. The fact that Congress has decided that you don't have to be registered with selective service to qualify for federal student aid doesn't have anything to do with state requirements for state financial aid.

Jill Desjean:

So many states are relying on this information, and now they're not getting it. They don't know whether students are registered with selective service.

Justin Draeger:

So we've asked the department to suppress this error code for selective service purposes. Have we heard back from them? Are they working on this?

Jill Desjean:

We have not heard back. We are still waiting on a response for that. They're aware of the issue.

Justin Draeger:

Okay. This is just my own personal curiosity here, Jill, but will this continue into next year with '23-24?

Jill Desjean:

No.

Justin Draeger:

Or it won't, because that's being removed?

Jill Desjean:

Because it's not a question at all, so that's accounted for, for next year, but not for this year.

Justin Draeger:

Okay. Jill, while I've got you here and we're talking about FAFSA's over multiple years here, I want to focus in on one thing that I was hearing a lot of questions about during our conference, on Pell Grants for incarcerated students. So a lot of people were asking if they had to offer aid to incarcerated students.

Jill Desjean:

Yeah.

Justin Draeger:

What's what's going on here?

Jill Desjean:

It's funny, we've read this a law like a million times, and we're so entrenched in it. We just keep saying, "Incarcerated students can get Pell Grants now, Incarcerated students can get Pell Grants now."

Jill Desjean:

And we saw a lot of schools who obviously haven't read the bill 10,000 times, and they're saying, "Wait, do I have to? How do I know when a student is incarcerated, if someone just applies to one of my online programs?" I saw that question popping up during our webinar last week, and I think it came up during the conference, in-person as well.

Jill Desjean:

And the answer is no. Pell Grants for incarcerated students is for a very select group of students. It's for established prison education programs.

Jill Desjean:

And so it's where an institution would decide that they wanted to offer programming to students who are incarcerated. They would enter into an agreement with a carceral facility, to offer specific prison education programs. It would be a whole process. You would know. If your school had a prison education program, you'd know about it.

Jill Desjean:

So if a FAFSA just pops up in your school, and you're not participating in prison education programs, you're not going to have to worry about whether somebody is incarcerated. That's not going to be an issue. But if you're in these agreements, then yes, of course you will have agreed to offer financial aid to incarcerated students.

Justin Draeger:

You have to be an eligible school, with an eligible program, and signed an agreement with the Department of Education to do any of this.

Jill Desjean:

Yeah.

Justin Draeger:

At which point, then you'll be operating under this new program for incarcerated students.

Jill Desjean:

Exactly.

Justin Draeger:

Okay. I know that, as I said earlier, we had submitted these comments on the '23-24 FAFSA. Jill, I know you worked with a Vera Institute for Justice, specifically on the incarcerated applicant form.

Justin Draeger:

We recommended a lot of changes to the form, and recommended some early implementation on provisional independent student status.

Justin Draeger:

I guess my question... Because you are part of policy and advocacy... Is, did the department take any of our comments or suggestions?

Jill Desjean:

They took one.

Justin Draeger:

Okay. And is this something to celebrate? What are we celebrating?

Jill Desjean:

We'll celebrate. Sure. The FAFSA used to say that it had to be completed in black ink, and the department has agreed to allow dark ink. Because apparently there are so many limitations for people who are incarcerated to be able to do things like fill out a form. The things that... Not just that a FAFSA is ever easy... But just things that we do in our lives, day-to-day, that are quite simple, are made incredibly more difficult if you are incarcerated.

Jill Desjean:

And so one of them, apparently, is getting access to black ink. And so we noted that, and the department said, "Sure. Go ahead and use any dark ink."

Jill Desjean:

So a little disappointing, in that we had about 5,000 recommendations. But I mean, we had a win there. And to be fair, they're still very much working on this. And so many of the things that we suggested, their response was just, essentially, "We're looking into it."

Jill Desjean:

So they'll tell you when they're not going to take your suggestion, in the response to comments. And there weren't many places where they said that. It was much more just, "We're engaging with the relevant stakeholders to see if this is a possibility, and we'll let you know." So not all bad news, but literally one thing that they said, "Sure, we can absolutely accommodate that request."

Justin Draeger:

Well, thank you very much, Jill, for all your work on this. And thank you. I know that you've been working hard with NASFA's FAFSA simplification task force, along with several other members of our team.

Justin Draeger:

We also had a lot of conferences about FAFSA simplification, and all the changes coming to federal methodology, at both our in-person conference and at our virtual conference last week, Jill, where you worked with some aid administrators to highlight how they're estimating what the federal methodology changes will mean for their Pell population.

Justin Draeger:

So hopefully people were able to attend that. And those virtual sessions, if your school signed up and registered, are also available on demand.

Justin Draeger:

Thanks very much, Jill. Let me turn my attention over to David for just a moment. David, always interested to hear what's cropping up in the community, what people are asking questions about. And so let me ask you this week, what is the phrase or the terminology we're going to be discussing today

David Tolman:

Today we're going to be talking about Pell recalculation dates. And sometimes it's referred to as a Pell freeze date or a census date, but the department refers to it as the Pell recalculation date.

Justin Draeger:

Okay. I'm going to pretend that I've heard all those terms before. But why are we using the Pell recalculation date? Why is that the term?

David Tolman:

Well, the policy comes from a section of federal Pell Grant regulations, 690.80 B, for anybody who wants to look it up. But it refers to an institution's option to recalculate a student's Pell Grant award due to a change in a student's enrollment status. Yeah, go ahead.

Justin Draeger:

So this is where the traditional census date comes from. So with statuses at full time, three quarters time, half time, less than half time. And with students constantly changing classes, I can see why it would be good to have an option to... This is the date we're going to adjust a student's aid, based on their enrollment status.

David Tolman:

Yeah. It's good to have that option. There's a lot of reasons why a Pell Grant has to be adjusted. So it's good to have this optional reason, so you can determine the best way of handling it at your institution.

David Tolman:

But just to list some of those mandatory reasons, if a student never initiates attendance in a class, and that changes the student's enrollment status, you have to recalculate it.

David Tolman:

Obviously, if the student's expected family contribution changes, and that affects their Pell eligibility, if it's a late disbursement after the term ends, that requires a recalculation, based on completed coursework, and also changing status between terms. Those are all the mandatory reasons.

Justin Draeger:

Okay. So if those are the mandatory reasons, explain how this optional policy works.

David Tolman:

Okay. So there's several things that schools can consider in setting this policy. One is to have a single date in each payment period or term, that applies for all students.

David Tolman:

You could have a policy of no optional recalculations. We only recalculate for the mandatory reasons. Or you could do the opposite, which is recalculate based on added classes and dropped classes throughout the full payment period.

David Tolman:

Or if you set a date, rather than having a single date, if you have modules, you can assign a Pell recalculation date, or PRD, to each module. And if you do that, the one that applies is the last module that the student attends.

Justin Draeger:

Could you have as an option, David, recalculation for some students but not others? Or this has to be applied across the board?

David Tolman:

This is an across the board. So once you set a policy, you need to treat all students the same. There's no professional judgment that you can apply to this.

Justin Draeger:

Okay. So walk us through the nuts and bolts of this, if we were implementing an optional reason. How does that work?

David Tolman:

Okay. Well, one reason I like that it's Pell recalculation date. Recalculation means you've already done an initial calculation. So that's one of the things that has to have happened first. You're doing an initial calculation.

David Tolman:

So for example, if a student hasn't even applied for aid on what you call a census date, you're not freezing that student's enrollment. You're not recalculating a Pell Grant, because no Pell Grant has been awarded.

David Tolman:

You're capturing the student's enrollment status. It's not tied to specific classes that the student has. It's their overall enrollment status.

David Tolman:

And then you disperse based on that status, on the Pell recalculation date, even if the student's status changes between the time of the Pell recalculation date and when you disperse aid.

Justin Draeger:

Knowing you, David, I know that it's best if we walk through some examples. So you've got some tee up for us, yeah?

David Tolman:

Yeah, let's go through a few quick examples. So on the PRD, or Pell recalculation date, the student was enrolled in 12 credits, which the school considers full time.

David Tolman:

Then the student later swapped a class, English 101 for Basket Weaving 359. But that still left the student at full time enrollment status. So because it's not tied to a class, the student's enrollment status did not change, even though the student's schedule changed.

David Tolman:

So that's one misconception that's out there, is it's tied to classes. It's not. It's tied to enrollment status.

Justin Draeger:

Okay. Got it. I'm going to leave aside for a moment that there's a 300 level course in basket weaving. Let's go on to your second example.

David Tolman:

Yeah, some of those intense basket weaving students... Okay. So let's start with the same scenario. They're enrolled 12 credits on the PRD, they drop the English 101 class, leaving the student enrolled in nine credits, which is three quarter time.

David Tolman:

And then it's important the student had started attendance in that English 101 class before dropping it. So there's no mandatory reason to recalculate it. The student turned in some assignments or something.

David Tolman:

Now it's time to disperse. The student's only enrolled now at a three quarter time status, but they were full time on the PRD, and that's what matters.

David Tolman:

You disperse the Pell Grant based on that full time enrollment status, if you've set it, because your policy says we don't recalculate for enrollment status changes. So even though they're three quarter time, you still disperse on full time

Justin Draeger:

Got it. And the third example.

David Tolman:

Okay. Same thing. Student's 12 credits. On the PRD, they drop the 101 class. But in this case, the student never initiated attendance in that English 101 class, and now it's time to disperse.

David Tolman:

So despite having that optional policy, because the student never established eligibility by initiating attendance, the mandatory recalculation reason pops in, and the Pell has to be adjusted.

Justin Draeger:

Okay. Got it. So those are the mandatory reasons. So despite your policy, in that instance, they never started. You do have to do a recalculation because their enrollment status changed.

David Tolman:

Yeah, that's right.

Justin Draeger:

We talk about modules quite a bit, and those examples use a single Pell recalculation date. I hesitate to even ask this, but can schools set a Pell recalculation date for each module a student's enrolled in?

David Tolman:

Yeah, they can. But it's important to note, if a school does that, that only one date is going to apply to a student, not multiple dates. And the student's enrollment status is captured only on that date, which is the last module that the student attends.

David Tolman:

So for example, a school has three modules, and has a PRD assigned to each of those three modules. The PRD that matters to that student is a student's enrollment status on the PRD pertaining to that third module.

David Tolman:

So any ads or drops that occur prior to that date are factored into the student's enrollment status. You don't take a snapshot of the student's enrollment in module one, and then another snapshot on module two. The only thing that matters is the module three Pell recalculation date and the student's enrollment status on that date.

Justin Draeger:

All right. I imagine some people with modules might have a few additional questions on this, or maybe just in general on Pell recalculation dates. So while we're on this topic, any other updates on modules, or anything around Pell recalculation dates?

David Tolman:

Well, I think one of the things that's driving questions on Pell recalculation date is the implementation of the return of title four funds freeze date. It works differently than the Pell recalculation date, but they're both referred to as freeze dates, in some cases.

David Tolman:

So next Wednesday we are doing a webinar specifically on return of title four funds freeze dates. That gets into a little bit more detail than what we could probably cover in a podcast. It's a 90 minute

webinar only on freeze dates and modules. So if that applies to you, I encourage you to tune in next Wednesday.

Justin Draeger:

Great. People can go out and register for that webinar. David, thanks very much. All right. Let's bring in our senior reporter and podcast producer, Hugh Ferguson. Hugh catch us up. What's going on in the world of financial aid. What's happening out in the news right now?

Hugh Ferguson:

Thanks, Justin. So in recent additions of TN, members can keep up with some recaps from our virtual conference, which we just concluded last week.

Hugh Ferguson:

There are lots of timely sessions on FAFSA, some federal regulations, DACA, and even more. And I'll include a link in the show notes to some of our articles that recap some of those handy details.

Justin Draeger:

Yeah. I think a lot of people may not realize that our virtual conference had all unique content. So our program committee had to come up with all new content and programming for the virtual.

Justin Draeger:

So whether people were able to attend in-person or not, this was a totally unique experience. We had to put a lot of work into making sure this was a unique experience.

Justin Draeger:

And we had a lot of people show up. For one session alone we had over 4,500 registrants. You can guess which session that was. But for all of them, across the board, we were around 2,500 to 3,000 registrants per session.

Justin Draeger:

So thanks everybody for showing up. And Hugh, thanks for covering, and making sure all of our members were getting the word about it. What else is going on in the news?

Hugh Ferguson:

So some other higher education news that we've been following is that there's been a trend in FAFSA completions being on the rise, with a number of universal completion policies contributing to some statewide increases.

Hugh Ferguson:

As our listeners know, there have been some worrying signs about enrollment trends since the onset of the pandemic. And this latest data set from the national college attainment network accounted for an additional 92,000 applicants seen since the class of 2021.

Justin Draeger:

Well, that's great. So we're seeing some pretty significant catch up, hopefully, and more people completing the FAFSA.

Justin Draeger:

And Hugh, I noticed your article on that actually was picked up by the Chronicle of Higher Education. So congratulations on that. Thanks very much Hugh.

Justin Draeger:

For all of our listeners out there, just a reminder, NASFA is in the middle of its NAFSA Gives Back campaign. All sorts of strategies that are reinvesting back in NASFA members, to support you, support your students.

Justin Draeger:

One of the ones most schools will be interested in is this one time \$600 learning credit that each institution has to claim, and then would need to use over the next 12 months.

Justin Draeger:

You can learn more about this at [nasfa.org/givesback](https://nasfa.org/givesback). Check that out. And thank you for listening to this week's issue of Off the Cuff.

Justin Draeger:

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