# NASFAA's "Off the Cuff" Podcast – Episode 262 Transcript

## OTC From the Field: Examining the Paying for College Transparency Initiative

## Justin Draeger:

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

## Megan Walter:

I'm Megan Walter with NASFAA's Policy Team.

## Scott Cline:

And I'm Scott Cline, the Senior Vice President of Enrollment Management and Auxiliary Services at California College of the Arts.

## Justin Draeger:

Welcome everybody, and Scott, glad to have you with us. You too, Megan Walter, I think it's been a while since we've had you on the podcast. Scott, just by way, if length of title is like how important somebody is on campus, I feel like your title might be getting longer the longer I've known you. Is that true?

#### Scott Cline:

It might be true, but I think it's an inverse relationship of how important I actually might be.

## Justin Draeger:

Is that right? Okay. All right. Well, we're glad to have you on, regardless. How long have you been at your school now? And tell us a little bit about your school.

#### Scott Cline:

Yeah, so I've actually coming up on 13 years, lucky number 13 here at California College of the Arts. And for context, we're a specialized art and design college with architecture as well. We're about 1600 students and we're based in San Francisco, California.

## Justin Draeger:

Okay. So we asked you on because you are one of several folks working in the aid community who oversee a rather large part of your institution, one of which is financial aid, part of enrollment management admissions, and you're part of a technical team that is advising a pretty prestigious group. You're on the technical working group of a college transparency initiative that we want to talk about today. I think our members have probably seen different iterations in some of the work of this group. We're currently in the middle of a comment period that we sort of want to talk about today. Megan Walter is one of the primary liaisons at NASFAA for this group. I serve as one of the task force members on this transparency initiative. It's all around financial aid offers. And before anybody tunes out, because we've talked a lot about aid offers, let me just pause, Scott and Megan, and I want to build a word cloud

in real time for just a minute because at NASFAA we have talked about aid offers for Scott as long... You've been at your school for 13 years. Lucky number 13.

I've been president at NASFAA for coming on 13 years. So I think you and I probably started in 2010. It's pretty easy to remember this. So we can count 2023, 13 years, and we've been talking about aid offers for almost as long as you and I have both been in our respective school's or institution's roles. Let's do some word association. What are some words you think our community uses when thinking about aid offers? What do you got?

#### Scott Cline:

Well, I think we're trying to keep our clean status on this podcast. So there are some other words that we might be able to use, but I think for our community, I mean, complicated, messy-Justin Draeger: Complicated. Okay. That's fair. Scott Cline: ... as well as rife with a lot of details and asterisks. Justin Draeger: Okay. Scott Cline: And confusing. Justin Draeger: And that's probably like, you could probably use those same words just to apply to financially in general. Okay. Megan, you got any? Megan Walter: I think based on some of the feedback I've seen, confusing, never-ending conversation. I guess that's two words, but-

Justin Draeger:

Well, you can hyphenate.

Megan Walter:

Never-ending conversation.

## Justin Draeger:

Okay. I would say maybe exhausted. If we're hyphenating, maybe beat-up. I feel like our community feels beat up on this topic. I do sort of feel like our community feels like in a lot of ways they can justify what they're doing with their aid offers, but there is no good solution. And we'll talk a little bit about that. But I'll recall the GAO report. We'll talk more about this obviously, but if you recall back in December, the GAO, Government Accountability Office came out with a report. And in the report, I just remember a third of the schools is a good example where they were like, the headline "was no schools in compliance with all 10 recommendations of the GAO report. Everyone fails." And then you read into the report and a third of the schools are using the college financing plan. So how can all schools fail if they're using literally the template from the Federal Government?

Well, the template's out of date and the GAO report sort of sliced it by saying, "Well, schools were supplementing the college financing plan with their own aid offers, but they were using the federal template. So I just sort of feel like exhausted might be one-

Megan Walter:

Can't win.

## Justin Draeger:

... or some... Can't win. Yes. That's good. Megan, that's another hyphenated one, so I'll give you that, bonus points. And then there are other ones. I do think there are no shortage of aid offers that are missing key elements. There are the 10 things on the GAO recommendations list, and there are four or five of them that I would consider like you can't get a passing grade if you don't have those four or five elements. And then there are five other ones that are sort of, I don't know, that takes you from a B+ to an A+. So you don't fail because you don't have those other five things, but calling it an aid offer versus an award is sort of like, I don't know, whatever with that. That's great, but that that's not why you fail. So we'll talk about all of that. So before people tune out because they're exhausted or feel they can't win or feel beat up or the never ending conversation, stick with us here because this is an important initiative and it is different this time.

This entire task force is being made up of a different group. We are not sort of as an aid community in this by ourselves. We have some important allies that are working with us. This is not a conversation that's done on Capitol Hill as we had Virginia Fox, the chairwoman of the House Workforce and Education on just a couple of months ago who talked a bit about this. Democrats are also obviously very interested in this. Consumer groups, student advocacy groups are all very interested in this. So maybe we'll start by asking you, Scott, as a person who's overseeing admissions, recruitment, financial aid, as a member of this task force and technical working group who's provided advice to college presidents, let's focus on the problem we are trying to solve. If you could try to identify what is the issue at hand?

## Scott Cline:

Yeah, I think it's a great opening question. I mean, it's the messiness that we're trying to understand. I mean, financial aid offices, our students, our families and their supporters are put in this place where it's really complicated how we pay for college in this country right now. And there's different sources of it, there's different ways of doing it. There's different types of programs out there. And both of these groups, both the financial aid administrators and the institutions that they work for and the institutions in general are put in this weird place where it's trying to distill this down to a very simple idea and be able to communicate that. And we spend a lot of time doing this. I think if you've been in financial aid for even a few weeks, if not years, your entire career, you spend a lot of time going over and over and over telling and talking to families and trying just to distill it down to something that is simple because it is way too complex but yet we're tasked with.

This is kind of that as Justin and Megan you're talking about, we're put in this middle place as financial aid administrators to take this really complex way that we pay for college and be able to communicate it so that students and families and their supporters can really make a decision. And so that's really what the problem we're trying to solve.

So if we're trying to quantify the issue, all right, how bad, I don't know if we can, but how bad is it? Can we quantify it? I think some people would quantify it as this obviously fits under the affordability issue sort of heading because we can't expect students, consumers, parents, lawmakers or policymakers for that matter to sort of address affordability if we can't even figure out how much students and families are paying or will be expected to pay. So how bad is it?

## Scott Cline:

I don't think it's an infinite scale or something like that. But certainly I'd say that if you just base it off the amount of time that financial aid administrators and institutions from colleagues that work in steering accounts to the bursar's office, spend trying to explain this. If you just look at that type of equation, it's pretty high up there. I mean, you spend lots and lots of hours and resources where you'd probably want to be able to be doing other things in the financial aid office, not just the compliance issues, but disbursement and delivery of aid.

So I'd say from just a time space, yeah, it's definitely. And then when you look at our families and our students and their supporters, I don't know how many of them are really going into this equation of trying to decide maybe which school to go to if they're comparing multiple options and that "traditional student," but also the ones that are looking at an individual program, just one program or they're going back to school for the first time after many years. I think they're also in this same boat with us in the financial aid community of spending lots of time and maybe, and pretty much most of the time not making a fully informed decision about it because it is that complex.

## Justin Draeger:

What are some of, Scott... Let's talk about what are some of the tensions that we're trying to balance here in an aid offer? So obviously you've talked about one of the paramount things we're trying to do, which is transparency and how much people are going to pay. Understanding. Okay, that's one thing. What are some of the other tensions that you see we're trying to balance in an aid offer?

## Scott Cline:

Particularly from the role that I now have at an institution. I mean, without a doubt, we're trying to heavily recruit students to come to our programs. We think they are great, amazing programs which applies to all those programs out there. And certainly we're trying to recruit those students, but we also have to do it in an ethical and transparent way because we know if we don't do it that way, if we don't have that transparency, it's going to end up in situations where we're not retaining students, we're not graduating students, those end goals as well. So I think that's one other consideration that it's not as simple as "covering something up." Nobody's really trying to do that. But we're trying to do it in a way that both presents the program, what we're trying to do here at an institution along with the cost of that program, and then the outcomes that they have on the other end of that side.

#### Justin Draeger:

And to be clear, if a school is trying to do that, if they are trying to obfuscate or obscure, we would see that as indefensible. We cannot defend that.

## Scott Cline:

Yeah, that's a non-starter. Exactly. But I think most of the time, the vast majority, that's not the case with schools. That's not why we work at schools or particularly financial aid officers work at schools. It's really trying to balance all that complexity.

## Justin Draeger:

The other thing, tensions I sort of hear are we're trying to balance touting what a school is offering or sort of its uniqueness in terms of institutional aid. We're trying to tout affordability versus we're trying to come up with enough money to help you cover costs. And then we're trying to balance comparability. How do you compare against another institution? We're trying to balance what our own student aid information systems can do, which if you have a homegrown system versus if you're trying to use an off the shelf system or some big program, but you don't have anybody on campus who can actually fiddle with it or program with it. So there's all these tensions that you're also trying to, depending on how many resources you have.

So with all of that in mind, we pulled together this task force, and this task force is made up of 10 associations that represent financial aid administrators, admissions, and then college presidents that represent all sectors of higher education, and system heads. And so Megan, from your perspective as one of NASFAA's primary liaisons to this task force, what makes this task force a little bit different than other initiatives?

## Megan Walter:

And I think when I first started thinking about this task force, I thought about our NASFAA task force, which I think a lot of members are familiar with, where it's made up of a couple NASFAA members, a staff liaison, they come up with recommendations, they go to a board of directors. We use those on the Hill, we use those with the department. The way this is a lot different in my opinion, is that as Justin just mentioned we have 10 other associations who represent this diverse group of associations with considerable influence in higher education. And then in addition to that, we have a robust group of stakeholders from all over the higher education spectrum. So we have think tanks, some of who have done their own research, done their own reporting on aid offers. So we have their expertise to draw on for feedback for their opinions. We have looped in software providers, as was just mentioned, that has been kind of an issue for some schools when trying to create aid offers is the limitations of their software. So we made sure to have those people's voices included in our feedback as well.

And then of course, we have organizations that represent diverse student populations, diverse student groups because we want to make sure that while we may think these are the best principles and standards and glossary and aid offer examples, we aren't the ones who are actually going to be using them on a daily basis. So we wanted to make sure that people representing students and students themselves have some input and feedback into this process.

## Justin Draeger:

So you just mentioned principles and standards and sort of examples, which is a little bit different. And this is currently out for comment. So our NASFAA members, and if you're members of the presidential associations, maybe your college president saw it, if you're a member of NAICU or ACE or AASCU or APLU or AAU or NACAC or one of the stakeholder groups that, Megan, cover the spectrum. But we have these draft principles and standards and this glossary, and we'll include links to all of those in our show notes today. But can you talk to me one, about the adoption of these? If we get to the end of this and this task force adopts these standards and principles and glossary and these examples, is the idea that

all institutions like this would be mandatory for membership? How do we envision this going out into the higher ed community?

## Megan Walter:

Yeah, sure. So hopefully we'll have some kind of final documents in the next couple of months. And I think our goal with this is to... It's going to be completely voluntary. Schools can decide whether or whether not they want to participate in this. But by participating, by sending in an aid offer and getting the stamp of approval, they would get this signification that says, "We are committed to transparency. And we've joined this other group, this other large group," hopefully, "of institutions who are also committed to this." I think going this way and not making it enforceable, not saying, "You have to do this," making this voluntary kind of takes the carrot over stick approach when we are doing this and if done right, we assume there'll be broad interest and support, since, I mean, even just hearing Scott talk, we know that there is a broad commitment to accuracy, clarity, and transparency among institutions already.

## Justin Draeger:

Yeah. And I guess going back to what you originally said about the composition of the task force, the biggest difference here is that the majority of the people on this task force are people that represent college presidents and system heads. It's not just the financial aid office who's trying to enact change by itself.

## Megan Walter:

And I think that's probably one of the biggest components of this is that we're now asking for presidential buy-in for this. A lot of, as we just talked about earlier, a lot of the reports, the GAO report, research we see kind of falls on the financial aid office, blames the financial aid office. And I think by not just asking the financial aid director to commit to these transparency standards and principles, but asking the president of the university as a piece of urgency and legitimacy to the conversation.

#### Justin Draeger:

I was at the American Council for Education's annual meeting a week or two ago, and Ted Mitchell, who's the president of ACE was at a general session, a plenary session, and stood up and asked college presidents about the fact that... told them about the fact that there were principals and standards that were out for comment right now and said, "At the end of this, we will be asking folks, asking college presidents and their schools to commit voluntarily to adhere to these standards and principles." So we want to make sure we get these right. And while they may not be compulsory and mandatory for membership at all these various associations, the idea is that we would build enough momentum that by joining the consortium, joining the movement, that they would hopefully get the stamp of approval. Now, this is all a proposal and conceptual stage. We actually need to finalize the principle standards and glossary of terms. And Megan, those are open for comment right now. How long will that be open and how do people submit comment?

## Megan Walter:

Sure. Yeah. So they're open through June 1st, 2023 right now. So for NASFAA members, I believe it was the last week of March we sent out the feedback request through Today's News and it will also be going out for the first week of May. There would be another rerun in Today's News if you want to access that.

And we can put that link to the last Today's News article in the show notes as well. Okay. Scott, let me turn our attention to just a moment to one point of, I think, sort of maybe contention, but at least a disagreement that sort of existed in this entire debate, which is sort of around the college financing plan, but also sort of bleeds into federal legislation, which is why not just have one form or just have one standardized template that sort of like, okay, this is it. NASFAA and this task force have looked at - there are lots of different examples that you could use to meet the standards as long as everybody meets the standards, which is pretty close to the 10 standards that the GAO set forward, as long as everybody meets the standards we're good. But other folks say one template. Everybody just use the same template. What do you see as the difference there?

## Scott Cline:

Yeah, I think as somebody lives in California, if you buy a car in California, the financing form has to be quote "on one page." It's a scroll that they roll out for you. They put it on one page, but it just continuously goes. And this is legislation that was passed in California decades ago, at this point. And for schools, we have different populations. Financial aid isn't one size fits all across all of our schools. Let's say the legislation put in there something about putting on Pell grants. Do we need Pell Grant information on it for graduate students who are not eligible for it? Or financial plans that families may not qualify for certain populations of students or even that they might put them in distressing amounts of debt as well. So I think the broad spectrum of the students that we're trying to serve can't be met with one form and one standardized template.

Sure. It'd give us that checkbox of saying, "We've met the requirements," and you might even pass the form. But the other thing to keep in mind is, anybody who's worked in financial aid for even a few years, let alone decades, is the constant change that happens within financial aid and how slow it certainly can be from a legislative point to actually update these things as things continue to evolve. And I'm one for sure to say that I don't actually know exactly how we're going to pay for colleges or what college costs are going to look like maybe even five or 10 years from now. And so how can we expect legislation to keep up with that pace? It'd be much better if we adopt our own standards and drive to that to have a flexible framework as well.

#### Justin Draeger:

Yeah, I'd just add from NASFAA's perspective, we've pointed out some of the flaws in the idea of one template or one form or just like this is the one true aid offer, including the college financing plan. We've actually invested also in consumer testing, true consumer testing that wasn't conducted by NASFAA. We hired an independent third party, and the final result was like, it's some amalgamation for different populations. We went in and did quantifiable and qualitative work to sort of say, like tested people's knowledge after looking at various forms. And what we found is exactly what you said. The independent researchers found that different populations are interested in different information. Megan, I'd be interested in your thoughts on this since you work on our policy department and sort of work on that middle ground between legislation and implementation.

#### Megan Walter:

And like you said, NASFAA's definitely not opposed to any legislation. I think we're just kind of invested in, if there is going to be some, making sure we get it right. And I think even if we do get legislation, if it's not perfect, I think that sets us up for a lot of failure as well. And I don't know if you can have perfect legislation, but I think the pandemic is a really great example of how quickly higher ed landscape can

change. And by having a really specific or standardized piece of legislation around aid offers really takes any room out for flexibility, for innovation, for modernization. So those are my kind of concerns with just focusing on legislation and why I do think this task force is really important and is a good at least step to try to improve where aid offers are going.

## Justin Draeger:

And if there is federal legislation, I think the thing is why wait? There's no reason why industry or institutions can't get started now.

Megan Walter:

Agreed.

## Justin Draeger:

And get moving today. So we've put this out, Megan, we've got, with the help of Scott and several other folks from our community who've been informing the work of the task force, we've got draft principles, we've got draft standards that would have to be met if people want the seal of approval. We've got some examples and we'll have more examples out as we move forward. The comment is out until you said June 1st, I think, Megan. And we've already received a lot of comments from NASFAA members, so I would love to hear... We don't necessarily have to share full names, but I'd love to hear some of the comments that we've already gotten from NASFAA members. What do we got?

## Megan Walter:

Yeah, sure. And I will just preface this before I answer this by saying that one of the things I really love and appreciate most about our members is that they are honest and they do not hold back with their feedback. And that's so good for us because we really want to make sure we get this right. We have had a decent amount of responses and they've all been really informative, really detailed. It's really been a quality over quantity for this feedback session so far. But I think what stood out for me in a lot of these examples is that they validate what we've been saying all along, even in this podcast, and why we've been so hesitant to support a one size fits all approach. Everyone in the feedback had a different opinion about different pieces of it, the documents, the aid offer, the glossary, and some of the opinions we got were completely contrary to the other one. So why one person loved it, one person hated it.

So I would definitely have my work cut out for me once this feedback session ends because they are all over the place. But really informative and just thank you for those of you have who have submitted them so far. We really appreciate it. I'll just go through a couple of-

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And you've really set the stage here, Megan.

Megan Walter:

Yes.

Justin Draeger:

So who didn't hold... You said our members didn't hold back, so let's-

Megan Walter:

I'll save those ones to the end, but there is some good constructive ones first. So this one is from a four-year private school. "In an effort to be transparent, our offers are becoming too long for students to see what is meant to be more compact and understandable." I think this is just a piece of a whole comment, but I think this is a really important thing we need to keep in mind when our task force is talking about this is trying to hit the balance of being transparent, making sure we're getting all the information out for students and their families, but also understanding that too much information can be confusing.

## Justin Draeger:

Well, I was going to say, Megan, that that's one of the principles, one of our first principles is that aid offers are primarily about, and I'm paraphrasing here, you might have to correct me, but one of our principles is about aid offers are primarily about disclosing how much financial aid somebody's going to get and how much it's going to cost we estimate to go to college. Because the idea is when we saw this in the task force, people start wanting to throw in all these other things that ultimately don't belong in an aid offer. We've even seen that in some federal legislation, and it's not that they're not good ideas, they're just not pertinent to the purpose of an aid offer.

## Megan Walter:

Exactly. And that's like why we may think these are all great things and students need to know this information. They're looking at this and going, "I don't know where to start with all this information now," so.

Justin Draeger: Right.
Megan Walter:  It's a very tricky balance that hopefully we can get right.
Justin Draeger: So this person thought that our examples were too long.
Megan Walter: Yes.
Justin Draeger: Is that right?
Megan Walter: Yes.
Justin Draeger: Okay.
Megan Walter:

This other one is from a community college. They said, "Community college offers should be in the same format as the four-year college, so students who will be transferring will be used to looking at the same form." This one was really interesting to me because our task force, and I believe you were on that day, Scott, when we talked about this, is we decided we needed to come up with a different form for community colleges or a different example for community college because those students are looking at different things. Direct costs are more important to them than other parts that maybe four year students care more about. So to hear from a community college financial aid professional saying, "No, don't do this, make them the same so they're used to it," was pretty unexpected for me. I don't know if you have any reactions to that.

## Justin Draeger:

Well, I would just say that this was definitely one of the tensions we heard between community colleges, two-year open access schools and four-year schools. Four-year schools, we were very much focused on total cost of attendance and community colleges were very much focused on direct billable expenses because they were saying the students that we serve largely are students who sort of have their non-billable expenses already built into their lives. That's not to say that they shouldn't be disclosed. They were just saying "maybe not so prominent."

Now, listen, I already can hear student and consumer advocates saying like, "Whoa, whoa, whoa, whoa, whoa, whoa, whoa. These are students who need to understand that by going to community college, they have costs built in for them that might access additional financial aid, including loans that would help them pay for things like childcare and other costs."

So you can send us your comments, but we are aware of that. But by and large, we definitely heard from community colleges on the task force or presidents representing community colleges, that billable expenses was by and far the thing they were most concerned about. It's sort of also interesting, tangentially related student aid issues that sort of cropped up in aid offers. So for example, the fact that schools could not in any way deter loan borrowing and at the same time were on the hook in accountability metrics for loan borrowing came up over and over again, even though it wasn't explicitly mentioned for open access schools, like came up over and over again in aid offers in ways that were like, "we don't want students to over-borrow, so how do we stop them in aid offers from over-borrowing?"

And we had to go into packaging and we had to go into transparency. And so these sorts of things came out tangentially with people who didn't work in the aid office and didn't understand the rules and regulations around all of that. Scott, I don't know if you have any insights into some of those conversations.

## Scott Cline:

Yeah, it highlights a lot of what we've actually been talking about already and going to more of a framework of principles, I think, to give some guiding principles as opposed to one set model for everybody or even for a subset of our community, like community colleges and our community college colleagues have a huge spread of who they serve and how they serve those students as well. And we need to recognize that. So I think all of those conversations, the comments that we're getting back from the NASFAA members are excellent and it represents that because again, this is complex ways of how we pay for college and because of that, until we're going to fix that, Justin, Megan work on that and fix that. But until we can fix that, really, we have to be able to have more of these fluid dynamic, but still guided in principles where are it's the conversation's always around that table, I think, always also came back to the idea of we're trying to convey information that's very important information. How do we do that?

Okay, Megan, give us another one.

## Megan Walter:

Okay, I have one more kind of good one and then some of more our direct feedback I'll share with after. So this is four-year nonprofit, quote, "This is an important effort. I appreciate the time and energy devoted to this by those directly involved. For many institutions, campus executives must commit financial and personnel resources to improving the quality of the financial aid offer. Aid professionals with the best of intentions often have no choice but to work with a template delivered by their software or system provider as they don't have the capability to modify the delivered product." I think that's two really important parts in there. A, they recognize the need for presidential institutional buy-in. They can't do it alone, just resources-wise, financial resources-wise, personnel resources, but also this issue with the software providers that they brought up. So I thought this comment kind of encapsulated a lot of what we've been talking about today as well with the issues that financial aid offices are seeing.

Justin Draeger:

Indeed. Okay. What's the last one?

## Megan Walter:

So this was the more direct feedback and bring it back to we love our members' honesty. I do love that our members feel like they can express themselves openly with us. So there's four of them, they're short. Quotes, "Honestly, it looks worse than what we do currently just from an aesthetic point of view, but also in terms of clarity." That was to one of our aid offer examples. "The part-time community college option I hate." End quote.

Justin Draeger:

Okay, got it.

Megan Walter:

Quote "Unappealing. Period."

Justin Draeger:

Yes.

Megan Walter:

And then, "This is an awful example." End quote. So hey, I appreciate feedback in every form we get.

Justin Draeger:

Now, wait, did those folks go on to offer anything constructive?

Megan Walter:

Yes. Some of it was constructive, but some of these were like, that was it. "It's unappealing, period," so we'll take feedback in any way we can get it.

Yeah. Well, we did get a lot of feedback. We just shared a small sample of some of the feedback and we want members to continue to share constructive feedback that will help us take all of this back to the task force. We should also add that we've also been collecting feedback from college presidents and they've been sharing it with their deans and their provosts who've also been sending in feedback, enrollment managers, and then also been getting feedback from up on Capitol Hill where we've been taking it. We've received feedback from the Biden administration who we've also taken this to. Megan, you want to say anything about the stakeholders that you mentioned at the top of the podcast?

## Megan Walter:

Yep, sure. So they have also been included in the 60-day feedback response period. So we have those out to about the 15, 20 or so associations, organizations in our stakeholder group as well. So, we're expecting quite a bit of feedback by the end of this.

## Justin Draeger:

So, we'll collect all of that. We're taking it then back to our working group. Scott and his colleagues will be taking it back to the task force at large, and then hopefully moving to full adoption of these principles, standards, glossary of terms, and we'll have some finalized examples over the summer. So we'll also be doing this at the NASFAA conference in San Diego. It'll be myself and Megan and Terry Hartle, who is formerly senior vice president at ACE and now a senior fellow there who is working on this issue. So join us in San Diego. Scott, will you be there? Will you be with us in San Diego this year?

#### Scott Cline:

I very much look to, and I like that you're having a shorter flight for me this year.

#### Justin Draeger:

Fantastic. Well, I thought, do you guys not have that train built from north to south?

#### Scott Cline:

I don't think you want to bring that up in California. Don't bring that up right now.

## Justin Draeger:

Okay, so thanks everybody for joining us for another edition of "Off the Cuff." Remember to subscribe. Scott, really good to see you. Glad to have you on the podcast this week. Megan, thanks for your expertise. As always, we will talk to you all again very soon.