

NASFAA's "Off the Cuff" Podcast – Episode 344 Transcript

OTC AskRegs Experts: Defining a 'Professional Student' and NASFAA's Recent Public Comments

Tim Maggio:

All right, welcome back to another episode of "Off the Cuff." I'm Tim with NASFAA's communications team.

Jill Desjean:

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

Sarah Austin:

And I'm Sarah Austin, also with the policy team.

Tim Maggio:

All right, welcome back. So, Jill, good to see you again. And Sarah, I think this is the first time we've done "Off the Cuff" together and I've given you a little bit of an expectation on what to expect, but I have surprises in store for you.

But before we get started, one thing that we got some feedback about is people like learning a little bit about us. And one thing that I wanted to ask you all is is there something recently that you've spent an embarrassing amount of time doing? Because I had an experience last night that I sat down and I was like, "Did I just spend 30 minutes doing that?" For our listeners out there, I do like to play video games, Fortnite is the one I've gotten into. So yes, I am one of those people over the age of 30 who plays Fortnite. But I saw on Xbox there was a game called Pigeon Simulator, so I spent 30 minutes last night playing a game called Pigeon Simulator and walking around a city landscape as a pigeon. And then I was drinking my coffee this morning and I was like, "Did I really spend 30 minutes of my life doing that last night?" And I just thought it would be fun to ask you all if you have similar experiences.

Sarah Austin:

Similar? I can't say I have a similar experience to that.

Jill Desjean:

No one has had an experience similar to that.

Tim Maggio:

Oh. Wrong crowd.

Jill Desjean:

I have an equally embarrassing, I don't know. I don't know if other people do this. Do you ever just, you're listening to a song in the car and you just change the lyrics to whatever's happening?

Tim Maggio:

Yeah.

Jill Desjean:

I do this all the time with my kids. At the dentist, there's no parking and Queen is on. And I'm like, (singing) there's no, there's no parking. I don't think they think it's funny, but I feel like when I'm dead they're going to be like, "Aw, remember that thing mama used to do."

So I was talking to Megan on our team about, this is kind of a spoiler for what Sarah's going to talk about, but hopefully I won't give away too much. About our comments on some changes that the department made to the student feedback page. And we were just big picture, just like, "What are we going to say here? What's the essence? What's our thing?" And I just was like, "Oh, the feedback button isn't accurately named." Instantly I was like, "Oh, that's a line from a song I like."

I immediately just started rewriting the next line in the song. It's "the glove compartment isn't accurately named and everybody knows it." And I was like, "Oh, this would be a great way to write our comments." The feedback button isn't accurate and everybody knows it. And then the next line is, "so I'm proposing a swift orderly change." And I was like, "Yes! That's what we're doing." I didn't say anything to Megan because I know she'd think I'm weird, but after we got off the call I probably spent 10 to 15 minutes just being like, "Can I write the whole song?" Yeah, I went too far with it. But yeah. But then Megan wrote the comments and they're just normal.

Sarah Austin:

I thought you were even weirder and thought that you actually knew of a song that said "the feedback button is not ..."

Jill Desjean:

No, no, no. Definitely I tricked all along, too. It was like, "I was searching," it goes on and on. But yeah, I was having a lot of fun about plugging all this stuff about student loan servicing and getting bad information, and how I want to tell the department to the words of the song that I actually really like. Yeah.

Tim Maggio:

Great. Much more embarrassing than pretending you're a pigeon. Yeah.

Jill Desjean:

Yeah, I guess it depends on your perspective, but that's a nerdy thing to delve into. Both of them are I guess.

Tim Maggio:

How about Sarah? Are you the normal one out of the three of us?

Sarah Austin:

Oh, no, no. Definitely not. I was actually thinking when you said, "Do you ever spend too much time on something," that is the essence of me. I spend too much time on everything. My husband actually calls ... I spend a lot more time telling stories. My stories just go on and on, and I need to provide every detail because I want everyone to know the feeling, the thing, every detail possible. So years and years ago, my husband started calling these Sarah Stories. And the second I'll start talking and he can tell he's going in that direction he's like, "Oh, a Sarah Story."

But then it's also progressed to also Sarah Situations. So it's anytime I'm spending entirely too much time on something that does not require that much time, "Oh, here's a Sarah Situation." So that's just my whole life. Everything I do, I spend way too much time and then I think back, "Why? Why did I spend so much time on that?" But I can't help it, it's just me. But I've never been a pigeon walking around, I will say.

Tim Maggio:

That's good. I'll keep that experience to me exclusively.

Jill Desjean:

I do kind of want to know what it's like now.

Tim Maggio:

It's interesting.

Jill Desjean:

I wouldn't even know how to play Fortnite if you gave me a week alone with-

Tim Maggio:

I'll get you on it eventually.

Jill Desjean:

... whatever device you play it on. Eventually.

Tim Maggio:

But I have one more question. I'll just do one question since, Jill, you've had experience with this before, but Sarah, I'm going to direct this question towards you. This is my Wait, Wait, Don't Tell Me NASFAA version. So I'm going to give you a trivia question before we get started with our real content and it's just like Wait, Wait, Don't Tell Me. So are you ready to play?

Sarah Austin:

Sure.

Tim Maggio:

All right. This is what I didn't give you a little bit of a heads-up on. So I'm going to give you three quotes or facts about a prominent figure in the financial aid or higher ed space. This could be somebody from NASFAA, Congress, Department of Ed, and you have to correctly identify the person. All right?

Sarah Austin:

All right.

Tim Maggio:

Sound easy enough?

Sarah Austin:

Yeah.

Tim Maggio:

All right. He's a first generation college student, having joined the department as a co-op student in the Office of the Inspector General. His OIG career began as an auditor, advancing to legislative liaison and criminal investigator. He has a new role that was recently announced and was quoted saying, "Our priority is simple, return to the fundamentals of accountability, transparency and results by honoring the promise of PBO legislation, federal student aid will deliver reliable, student-centered service that America deserves." Do you know who this is?

Sarah Austin:

Okay, this is embarrassing, but I do know that we just talked about him and I know that I googled him after and he's very hard to Google. Not much comes up. I feel like the name Lucas, it's either his first name or his last name.

Tim Maggio:

Yeah. Last name.

Sarah Austin:

Okay, yeah, he has two first names.

Tim Maggio:

This is true.

Sarah Austin:

I remember that. So that's as far as I can get, I don't remember his first name.

Tim Maggio:

I'll give you it. Correct, it is incoming Acting Chief Operating Officer at FSA Richard Lucas.

Sarah Austin:

Richard.

Tim Maggio:

And yes, he is one of the few people in the year 2025 who has a very small digital trace on the internet. Finding a photo of him was incredibly difficult.

Sarah Austin:

Yes. And see, I am a visual person. If I would have seen it, I would have remembered.

Tim Maggio:

Right, right. But thanks for playing, Sarah. And we did do this game a couple other times, and I did promise a listener before that I have a voicemail that I've created. So if you're interested in seeing and

hearing that voicemail that I created for Daniel Barkowitz, I'll post it in the Random Slack channel for NASFAA communities, so stay tuned for that. I think it was a pretty fun one to record for Daniel, so I hope you enjoy it.

But with that being said, I know we've got some things to talk about and I think we'll start with you, Jill. You have a topic of professional student that you'd like to discuss?

Jill Desjean:

Yeah.

Tim Maggio:

So where did we land with that? Because when I think of professional student I'm like, "I'm a professional." Financial aid officers are professionals, anyone could be a professional. So why do we care about this topic?

Jill Desjean:

Yeah, that's a great question. I was thinking there's depending on where you put the emphasis, I know that a lot of people talk about professional students as in that person who has six master's degrees. That's not what we're talking about.

Tim Maggio:

Oh.

Jill Desjean:

We're talking about a professional student, which is a classification of student that, to your point, why do we care? We never really used to. Not because we don't care about these people who are enrolled in professional degree programs, but for the federal student aid programs, there never was a reason to distinguish between a graduate student and a professional student. They were eligible for exactly the same types of financial aid. So some programs, a school might consider professional, some might be officially or unofficially defined as such in some classification. But really, we didn't care before whether someone was a graduate or a professional.

And now with the One Big Beautiful Bill Act, all the changes that they made to student loans, one change they made was to set different loan limits for professional students. So suddenly, everyone is very interested in who is a professional student because it matters for how much they can borrow.

Tim Maggio:

Right, right. And I can imagine, to the point I was making earlier, as a student I'd be like, "What does professional mean?" So what does OB3 say about who qualifies under this new definition?

Jill Desjean:

Yeah, they didn't make it easy. It starts easy.

Tim Maggio:

Surprise.

Jill Desjean:

A professional student is a student who's enrolled in a program of study that leads to a professional degree. Great. Then of course, we have to ask what is a professional degree? This is where things start getting a little weird. The OB3 points to a definition that's in existing regulations. So in Codified Federal Regulation 668.2, there is a definition of a professional degree, and it's kind of long, but I'll just read it.

"A degree that signifies both completion of the academic requirements for beginning practice in a given profession, and a level of professional skill beyond that normally required for a bachelor's degree." It says that, "professional licensure is also generally required." And then it gives some examples of a professional degree and it says, "It includes, but is not limited to," and there are 10 programs. There's pharmacy, veterinary, dentistry, chiropractic, law, medicine, optometry, osteopathic medicine, podiatry and theology.

And just for some background on that definition, it was referred to as really old during negotiated rulemaking. It's from the '70s. I take offense a little bit because I'm from the '70s, too. But admittedly, it's been around a long time. And it's something that the National Center for Education Statistics came up with as a classification. Again, not having anything to do with eligibility, just a way to classify different programs. But these are the programs that NCES defined as professional back in the 1970s. Then that's what Congress pointed to in the law, so that's what the Department of Ed had to work with when they in Neg Reg trying to figure out who's a professional student.

Tim Maggio:

Okay. So, Jill, you say included, but are not limited to, these programs. So do we think we're going to get ... What does that mean? How are we going to figure out what those are not limited to programs would include?

Jill Desjean:

Right. So that's where Ed had to do their work during Neg Reg. So I think some negotiators came to the table and a lot of people who weren't at the negotiating table, but had an interest in this professional student definition said, "Well, great, you guys have all this flexibility, included but not limited to. Let's go ahead and expand this definition." And the department on day one or day two of negotiations came in and they said, "We are not going there. We are not going to touch this definition, we're keeping it to those 10, and that's that."

They briefly proposed this concept of an interim professional student. It really didn't go anywhere, some negotiators were very much opposed to it and it was probably going to hold up consensus, so they abandoned it. But then they came back during week two of the negotiations and they said, "Okay, we are willing to examine expanding on that definition a bit." And that's where they went during Neg Reg.

Tim Maggio:

Okay. So, Jill, that's interesting. So what type of flexibility? Do they have a lot of flexibility with moving forward? How does that work?

Jill Desjean:

Yeah. It's a more complicated thing than you might think. The challenges the department faced here was that they couldn't change that 668.2 definition that the law points to because the law points to it as of the date of enactment of the OB3. So even if the department changed that regulatory definition, they'd always have to go back to what it was only July 4th, 2025 as the definition of professional degrees. So

they had to come up with a definition for these professional loan limits versus broadly, and that's where you see this new definition that they wrote out of Neg Reg that they put into a different section of the regulation, 685.102. These are the direct loan regulations and they're only defining a professional student for directly loan purposes.

So what the department had to do here was basically look at what's in that 668.2 definition and then think about what other programs logically fit in there. They can't just say, "Ah, you're a professional, you're a professional." There is something that Congress pointed to, they obviously had some intention when they wrote the law. So the department couldn't just say, "Oh, I think zoology is professional, I think history of whatever is professional." They needed to have some reason to base this, something that would stand up to legal scrutiny. So they looked at those 10 programs and said, "What's common among these 10 programs, and what else does 668.2 say that we could say, well, this program is obviously very similar to that, it meets these same criteria," whatever it has to say. It can't be arbitrary.

So you quickly realize when you look at that list of 10 programs that one of these things is not like the others and that's theology. So that's how you get to the department's proposed definition that came out of Neg Reg, where they used the word generally a lot more than you like to see the word generally used. You want your regulations to be like, "It's this, it's this, it's this." So when you look, it's like, "Well, it might be this, generally this." And it's just because they were like, "Well, if we say it has to be A, B, C and D, theology doesn't fit in there, but we have to keep theology in there because Congress pointed to that definition when they wrote the law."

So where they landed was, "A professional degree signifies completion of academic requirements for beginning practice in a professional, level of professional skill beyond a bachelor's degree." And if that sounds familiar, it's because it was lifted verbatim from 668.2. That seems pretty legally sound because that's what Congress pointed to, so so far, so good. Then they threw in there a, "Generally at the doctoral level and requires six years of postsecondary education for completion, including at least two years the post-baccalaureate level." And they took this from, again, NCES, their definition of a professional program. Again, trying to just rely on where have we already addressed this, where is this some place in the regs or in common practice that we can say, "We did A because it had already been done for B."

Here, the department noted that theology programs actually don't meet this requirement. They said this during Neg Reg. Again, their hands are tied. They don't think they have the authority to take theology out, so they have to assume that Congress meant for it to stay in there. So Ed just said that they're going to address this in the preamble to the regulations, which I know our friends over on the TRA, training and regulatory assistance team at NASFAA hate. They like to see things in the regs, not tucked away in some little paragraph in the explanations for the rules, but that's what we're going to see. And they're going to basically say that they use the word generally here only for purposes of theology, and just noting that those have typically been professional degrees. But otherwise, they expect any program that would be considered professional to actually be at the doctoral level.

Tim Maggio:

Okay.

Jill Desjean:

Moving on, the definition goes on to say that, "A professional degree generally leads to professional licensure." This is also lifted from 668.2, so legally sound. And then this is where the expansion starts to come in. They include any program that meets those criteria I just listed, so doctoral, program length,

level of skill, licensure, and that has a four-digit CIP code in the same intermediate group as the original 10 from that definition as 668.2.

Tim Maggio:

Okay. So lots to digest there. At first, I was thinking generally was going to be their version of it depends, but it seems like that's really for a very specific purpose. But you mentioned these things right at the tail end called the zip codes, but not zip codes in the way that most people might be familiar with an address. These are actually CIP codes. What are these?

Jill Desjean:

Yeah. So CIP codes, not zip codes. It stands for classification of instructional programs and it's a way of classifying different degree programs. It's like when you think of kingdom, phylum, order, species kind of thing. It's that for-

Tim Maggio:

Okay.

Jill Desjean:

... postsecondary education programs. So CIPs are six digits long. The first two digits are very general, and then as you dig deeper into the four and then into the six, you get more precise.

As an example, the two digit or the most broad CIP for health professions is 51. And that includes literally everyone from an orderly to a medical doctor. Anyone in the health professions field has a CIP that starts with 51. But if you go to the four digit level, 51.20 is pharmacy, and so that is narrowing down a little bit more. You've taken out the medical, you're taking out the orderlies, now you're just talking about people who are in the pharmaceutical sciences. But even that four-digit CIP includes anything from a PharmD to pharmaceutical marketing and management. It's only when you get to the six-digit CIP code that you land just at PharmD.

So coming back to these professional degree criteria, pharmaceutical marketing and PharmD have the same four-digit CIP code. So you could say, "All right, maybe pharmaceutical marketing is a professional degree program." But they would have to also meet those other criteria. It'd have to be a doctoral program, have to meet the program length requirements, the level of skill and the licensure. I don't know, I don't think that pharmaceutical marketing does, but if someone did offer a program that met those other criteria, it could be a professional degree program, but the school's going to have to look at that.

Tim Maggio:

Okay, interesting. So I don't know, this seems like a lot, but is there anything else that we could add into the mix of all of this?

Jill Desjean:

There's always something else, Tim. Yeah.

Tim Maggio:

I thought you might say that.

Jill Desjean:

No, Tim, we're done. That was so easy. Yeah, it's bad enough or hard enough. It's not bad, it's just it's a lot to swallow.

But finally, the department says that, "Professional degree may be awarded in the following fields," and so they're giving some examples. And they give those 10 fields that we already talked about that are in CFR 668.2 because Congress pointed there so they have to include those. So it's those medical programs, podiatry, pharmacy, theology. But they added one, they added psychology, specifically the PsyD or the PhD. And the department gave a justification for that. They said that it's based on the fact that in the gainful employment regulations, they treated PsyD and PhD psychology as professional students because they gave them the same amortization periods for calculating the annual loan payment for the debt to earnings ratio for clinical psych as they did for med.

So that's really, really, really weedy. But basically, they're saying this one time we treated clinical psychologists like professional students because we grouped them in with all these other people who are professional students for purposes of calculating the debt to earnings ratio in the gainful employment regulations, hence we've got some precedent so we're throwing psychology in there. So we've basically got 11 CIP groupings, 11 four-digit CIP code groupings where we only had 10 before that could potentially be professional degree programs, but we don't know how many will ultimately end up being professional degrees.

Tim Maggio:

Right. And that was a bit of a win because that was one that people were advocating to have added into the group?

Jill Desjean:

Yeah, it was definitely a win for people who have clinical psychology programs at their schools and for the students they enroll. But I know that there are a lot of other fields, I've been getting emails from a lot of financial aid administrators saying things like they're confused about the health professions piece broadly. They're like, "Well, what about a PA? What about a doctor of physical therapy? What about a nurse anesthetist?" I've heard all kinds of health professions, and even some fields outside of the health professions that people say, "We've always considered this a professional degree, whatever that means, because the definition didn't really matter. But how is this different?"

Tim Maggio:

Right.

Jill Desjean:

How is a PA different from an MD? And yeah, obviously we're not defending anything that the department came up with. They have to come up with something that they feel like is legally defensible and that's where they landed. But yeah, it is a bit of a blow to the people who thought that the department might have gone much broader during Neg Reg, to really have only added one program to that definition that Congress pointed to.

Tim Maggio:

Sure, sure, that makes a lot of sense. I know there's still a lot more to digest, but we have a few more things that are coming up from NASFAA and some resources that are out there that can help people out.

Maybe some charts, some webinars, and some other stuff. So what can people look for or look forward to?

Jill Desjean:

Yeah. So December 4th, we have a webinar coming up and we will be talking exclusively about the outcomes of the RISE Negotiated Rulemaking Committee, so the loan provisions of the One Big Beautiful Bill Act. We will not get nearly as deep into professional degree programs as we did here, but we will get much deeper into loan limits, adjustments to loans based on less than full-time enrollment, institutionally determined loan limits, all that good stuff. So definitely please tune in on December 4th for that.

We are also revamping what we had previously been calling our Reconciliation Web Center, and we're calling it now the One Big Beautiful Bill Act Web Center. That's just to reflect that we were following all of the machinations behind the scenes up on the Hill in the development of this, but the House version versus the Senate version isn't super relevant anymore. Now what people need to know is what's happening now. So we're going to pare down, get rid a lot of the older coverage about all the steps it took to get us there, and focus more in just here's the bill that we have, here's what's being implemented, here's when it's happening. So we've got a new flowchart to help people understand the graduate and professional student loan limits and we're working on a bunch of resources that will get added there over the next couple of months.

Tim Maggio:

Awesome. Thank you, Jill, and to the policy team, always making sure we've got those tools at our hands. Jill, last time I was on "Off the Cuff," I was joking around with David Tolman that I sometimes feel like me being on "Off the Cuff" now is NASFAA's tricky way to train me on these things. So thank you for the training.

And, Sarah, I think we've got some topics that you all want to make sure, I think it's for our listeners, but I feel like this is a way to make sure I'm up-to-date, too. No, only kidding. So, Sarah, what do you want to chat about today? I know we've just talked about a lot of really fun stuff. What's the fun stuff you got for us?

Sarah Austin:

Yeah. Jill definitely took the harder stuff. I've got the in case you missed it, which will be perfect for you, Tim. But first, I did want to just mention that Jill had said part of that webinar, one of the provisions that came out of the RISE Committee is related to the loan limits for less than full-time enrollment.

Tim Maggio:

Okay.

Sarah Austin:

Which a lot of times, we've been calling this loan proration, but I think that gets a little confusing because we have existing, previous, that still exist right now, loan proration for those academic programs that are less than a year or students are in their final term that's less than a year. That loan proration is separate. So I think we're trying to get away from calling all of this loan proration because that's confusing to have two different types of loan proration that exist at the same time.

So what we're calling this is the loan limit reduction for less than full-time enrollment. A lot more of a mouthful than just saying loan proration, but that's what it is truly. But what I wanted to mention is that we know there are a lot of outstanding questions on this specific provision, and unfortunately we do not have a lot of answers at this point in time. So while we see your questions and we are absolutely fine getting your questions on this, we don't necessarily have answers on a lot of it right now. But the department, we are actually going to send over a list of questions on this specific topic over to the department and we will hopefully be able to get some answers for our members soon. And of course, we will get those out to you as we do get more information.

Specifically, some things that we've been seeing a lot about were summer crossover periods, how does it work for that? Or different academic calendars, like if you have a BBAY calendar. The impact of withdrawals in R2T4. So we see those questions, we're keeping a list and we're going to send them over to the department and hopefully get you all some answers. So stay tuned for more on that, but I did want to mention that so you know that we are listening and we're trying to get you more information.

Tim Maggio:

Awesome. Thanks, Sarah. Yeah, it's really important that you send us those questions. We have them, too. And our team over here, the policy team and TRA team, they're always coming up with more questions to ask Ed. They're always trying to think ahead for you, so appreciate that.

But I think there's so more things that you wanted to make sure our members know about, Sarah. What do you got for us?

Sarah Austin:

Yeah. Jill alluded to it earlier, but I did want to talk a little bit about NASFAA's public comments.

Tim Maggio:

Okay.

Sarah Austin:

So that's where I think I'll start and we'll see how far we can get.

Tim Maggio:

Sure, sure. So I just wanted to maybe zoom out a little bit for public comments because this might be some of our listeners might not know a lot about what that process is. So can you just start with what's the importance of these public comments, what are they, and maybe a little bit of a behind the scenes for how NASFAA develops these?

Sarah Austin:

Yeah. So when we say public comments, it really has multiple different examples and scenarios, but we just lump them in and say our public comments. But there's basically certain times when either the department or maybe even Congress, or someone is soliciting comments, feedback, suggestions, improvements, concerns, all of that. So they'll put out this comment request, and then basically NASFAA will write up some public comments and because they are public, they will be on the record, they will be out there for everyone to see.

But the different situations when this might come up, there might be an information collection, there might be proposed rules. So we've seen that more recently, like the PSLF proposed rules, they solicited

comments for us to then write in. Proposed revisions to things like the E-App, which I'll talk about it in a second. Any time there's negotiated rulemaking come up, when they first put out that intent to establish negotiated rulemaking committees and the topics, we will submit comments on that. There's even things that are more annual, so the FAFSA each year, we comment on proposed changes to the FAFSA each year, so that's more of an annual process.

But really, how we develop our comments is a variety of ways. Of course, the policy team handles the actual writing and organization of the comments, but we definitely work with other departments at NASFAA, specifically our training and regulatory assistance team, the TRA team, since they field a lot of questions from our members and they're obviously the ones training. So sometimes they are the experts on a topic and we want to make sure that they weigh in as well. We will also solicit member feedback. Things like putting out a question in our Rapid Response Network to see if our members have specific suggestions or feedback on a topic. We also receive your feedback unsolicited, which we love. So you can always, if you're sending in just feedback for NASFAA, we keep track of that and we make sure that we review and see if it's something we do want to include in our comments of course as well.

Like Jill had mentioned, we come at it first with what is our general essence, what's our general theme here, and then of course dig down into the weedy, more specific topics. We also of course look to other organizations if it's something that's maybe not expertise, but is still indirectly related to financial aid. We want to make sure that we have experts that we maybe get some more information from or clarification from to make sure that we understand it fully, the impacts of things. So really, how we develop them is going to vary based on the actual topic.

But once we have our comments written, we always try to get them out in a preview to our members, usually around a week in advance of when we actually need to submit them. That way, if our members do then have some feedback or want to point out something to us that maybe we missed, or anything like that, then we have that time to then update those comments and actually submit them. So we typically would run them in Today's News as a preview, and then when we actually submit them, we always run our final version of the comments so that everyone can see what was actually out there on record.

And if you want to look at our past comments, you can of course find them all on the NASFAA website. I will say from maybe August to October, I feel like all I did was work on public comments. I know I was talking to Megan, my coworker, and we were like, "Is this our job? Is our job just 100% writing public comments?" Because we wrote a lot of comments. And I know I've said this before, maybe even on "Off the Cuff," but when I moved over to the policy team I remember in my first week, Jill was explaining to me how we do our public comments. And I remember her saying, "If they ever let us comment, we comment. If they give us an opportunity to say something, we're going to say something." So we comment on everything that's related to financial aid, of course. But we will always take the opportunity to comment, whether it's something we agree with, disagree with, have suggestions for. Whatever it is, we are going to comment.

So the last few months, we have written a lot, a lot of comments. Two of them I just wanted to highlight in case you did miss them. One more recently, I think it was just in the last couple weeks. We did provide comments on the new FSA feedback system. I shouldn't say new, the revised feedback system. And the system is not new, it's been around 2016. But this is FSA's feedback system that we previously referred to as the complaints, but they've now switched the wording. It doesn't even say "submit a complaint" anymore. It says "submit feedback." Which of course, alludes to them wanting more than just complaints. But when you actually dig deeper on submitting something, it really does seem like all the options are still related to complaints, or concerns, or issues.

So we actually submitted, in our comments, we said really the button, like Jill said, was not accurately named. The button should really match what you're actually soliciting. So feedback versus complaints, or concerns, or issues. But wording matters because someone's not going to click on that button if they don't think what they're trying to provide matches that button. So we had some suggestions on the wording there. We did support some of the changes that maybe refined the options that there were. There were some very, very specific, small subset of issues that they had certain buttons for and they've really more streamlined that and refined those options, which I think would be an improved experience for someone going on there and submitting their feedback.

But if you want to look at our full comments on what we thought of the revised feedback system, we put those out in TN, Today's News, I want to say two weeks ago, maybe a week-and-a-half ago. I don't know, time doesn't even exist right now. But you can also find those on the web, and I'm sure we can link them in our resources as well.

But the other one I wanted to mentioned, which was actually back in October. But in case you missed it, I do think is pretty important for our members, was our comments on the revision to the E-App. And there was many changes actually. I will say, I think the department did a great job when they put out this comment request of showing exactly what changed. I think it's really hard for us to sometimes figure out what they've actually changed, especially if they've actually they've already changed it because we're trying to remember what was it before, but that doesn't exist anymore. So this was actually really well done I think. They put out a chart that said exactly what changed, line by line.

So there were a lot of changes and a ton of them we supported. We felt like they were super good changes, really trying to streamline and make it more user-friendly. Some major things that changed that we really like was no longer having to provide tons of personal contact information for tons of people. I know, Tim, you're nodding. We heard this complaint loud and clear from our members. When this change went into place where you all, when submitting your E-App, had to provide so much contact information for so many people, we know it was a huge burden and really couldn't see the reasoning for it. So that is changed. You now only need to provide the contact information for the president or chancellor, and then emergency contacts, which to me makes way more sense. Great change. So we highlighted that. We want to make sure they stick with that change.

Other things like automatic approvals for simple updates. We want clarification on what those updates are, but anytime there could be an automatic approval and not have any sort of manual intervention by a staff member sounds great, especially knowing the processing backlogs and everything. So we're really on board with that.

Also, not having to submit all of your policies and procedures for review, instead you're self-certifying that your policies and procedures meet all the requirements. And then of course, there's other ways that they're going to make sure you have your P&Ps in place, like program reviews, audits, all of that. So I think tons of wins in there.

We did have just some overall concerns about, again, the processing time, the backlog that they're currently working through. And also, the inability to make a change to your application if you already have one that's under review or in process. Because there's such a long backlog, we're hearing from people that they've submitted it over a year ago, they may have had a lot of changes since then and they can't submit those changes because their application is still under review. So we are suggesting some way where they can make updates even if they've already submitted some previously that haven't been fully processed.

So those full comments are also on our website. But I know that I can't go into detail on everything we included in there so please check those out because I do think that a lot of it is really positive, which is a win here.

Tim Maggio:

Yeah, great, great. Yeah, public comments are definitely an important tool that we use here at NASFAA, and I love that any time we can comment, we will comment. We should get that on a T-shirt somewhere.

But other than public comments, Sarah, anything else that you just want to flag for our members before we end the show today?

Sarah Austin:

Yeah. I'll just briefly mention that on Monday this week, the department put out an electronic announcement that just announced the final PDF versions of the 26-27 FAFSA and incarcerated application, and lockups of the FAFSA submission summary were out there. I find those helpful. No surprises here, of course we already had seen the FAFSA. It's been live for quite some time now, but the final versions are out there.

And one thing that I did just want to mention because I've seen some chatter on Slack and I've actually had a couple direct questions from members on, and I wanted to make sure that it was very clear in the PDF FAFSA so that I could reference that as well. Deals with one of the changes with the 26-27 FAFSA that I think is a good change was in regards to spouses' information on the FAFSA, so either the student spouse or a parent spouse. But when they are not a required contributor, so they are not having to actually go in there and fill out a portion of the FAFSA, probably because they filed joint taxes, that would be the reason why it would bypass the spouses' information because it's already pulling in the joint taxes. When that is the case, in the previous cycle, it was still required to submit contact and identity information for the spouses, which a lot of people were like, "Why? Why do we have to provide this information if they're not a contributor?"

So that actually changed with 26-27 and I think it's one of those changes that is a good change, but it went under the radar since there was so many other big changes, like the whole contributor process. So I just wanted to make sure that everyone knew that as you're pulling in ISIRs, since I know many schools are doing that now, you will not see information for those spouses if they're not a required contributor. And I know one of the questions I got personally from a school was they were expecting those fields to have that information because that's how it was last year. So when they pulled in their ISIRs, they thought there was a disconnect between their system and the FAFSA. They thought they were missing information on it, and maybe a bug or a glitch, or something. I know people are thinking back to 24-25 FAFSA where they just assume something's not working correctly. And in this case, it's actually working correctly.

So you no longer have to include that identity and contact information for the spouse, which the exception of parent spouses, we still need the date of birth for the other parent. And that has to do with the behind the scenes income protection tables, all of that. But you will no longer see things like their contact information, you will only see date of birth. So if that's what you're seeing on your ISIRs and you think it's wrong, it is most likely right. And I followed the PDF FAFSA to make sure that, when they say what questions you can skip, the logic does match what it should, so that's all good news.

Tim Maggio:

Nice, awesome. Thanks, Sarah. Well, Jill, Sarah, thank you so much for everything you've shared with us today. I know that people will probably be asking about when the transcript comes live from this podcast because there's a lot of stuff we covered, so we will get that up as quickly as possible for folks. But I also just want to say I know a lot of institutions might have some time coming off where employees

can take a little bit of time off in the next coming week, so I hope that you all get a little bit of time to rest. Maybe you can try out Pigeon Simulator and become a pigeon and have a little bit of fun.

But with that being said, thanks for joining us for another episode of "Off the Cuff." We'll have all of those resources listed on the show notes. And make sure you like, follow us anywhere you can find podcasts.