



## **FINANCIAL AID ADVISORY COMMITTEE (FAAC)**

### **Handouts for the November 21, 2019, meeting:**

- **Current Agenda**
- **Draft minutes from the September 2019 Meeting**
- **Handout for Agenda Item D: Presentation: Urban Institute Financial Aid Study**
- **Handout for Agenda Item E: Presentation: Proposed Update to Texas Administrative Code Related to Student Indebtedness**
- **Handout for Agenda Item J: Financial Wellness Learning Collaborative**
- **Handout for Agenda Item K: FAAC Annual Report**
- **Handout for Agenda Item N: Legislative Recommendations Subcommittee**
- **Handout for Agenda Item Q: FAFSA State Deadline Language**
- **Handout for Agenda Item R: Proposed Updates to Texas Administrative Code**

## Financial Aid Advisory Committee Meeting Agenda

Name of Committee: Financial Aid Advisory Committee  
Date of Meeting: November 21, 2019  
Time of Meeting: 10:30 a.m.  
Location: Texas Higher Education Coordinating Board Headquarters  
Board Room, Room 1.160  
1200 E. Anderson Lane  
Austin, Texas 78752

### Agenda

- A. Welcome, Introductions, and Overview of Meeting – Robert Merino, Chair
- B. Consideration of Approval of Minutes from the meeting held on September 5, 2019 – Robert Merino, Chair
- C. Update: External Relations – John Wyatt, Sr. Director, External Relations
- D. Presentation: Urban Institute Financial Aid Study – Sandy Baum and Kristen Blagg, Urban Institute
- E. Discussion: Proposed Update to Texas Administrative Code Related to Student Indebtedness – Ginger Gossman, Senior Director, Innovation and Policy Development
- F. Election of Vice Chair – Robert Merino, Chair
- G. Approval of 2020 Meeting Dates – Robert Merino, Chair
- H. Discussion: Member Expectations – Robert Merino, Chair
- I. Update: Prior FAAC Business – Charles Contèro-Puls, Deputy Assistant Commissioner
- J. Presentation: Financial Wellness Learning Collaborative – Erin Willig, Program Specialist, College Readiness and Success
- K. Presentation: FAAC Annual Report – Diane Todd Sprague, Past Chair
- L. Update: TASFA Sub-Committee – Robert Merino, sub-committee Chair
- M. Update: Data Collection Sub-Committee – Samantha Stalnaker, sub-committee Chair
- N. Update: Legislative Recommendations Subcommittee – Shannon Crossland, Chair
- O. Update: TASFAA Recommendations and Feedback – Lyn Kinyon, TASFAA President
- P. Update: School District Recommendations and Feedback – Terry Sheneman, Fort Bend ISD
- Q. Discussion: FAFSA State Deadline Language – Charles Contèro-Puls, Deputy Assistant Commissioner
- R. Discussion: Proposed Updates to Texas Administrative Code – Charles Contèro-Puls, Deputy Assistant Commissioner
- S. Update: Preliminary Considerations for 87<sup>th</sup> Legislative Session – Charles Contèro-Puls, Deputy Assistant Commissioner
- T. Update: Office of Student Financial Aid Programs – Charles Contèro-Puls, Deputy Assistant Commissioner
- U. Discussion: Topics for Future Meetings – Robert Merino, Chair
- V. Adjournment – Robert Merino, Chair

*Texas Penal Code Section 46.035(c) states: "A license holder commits an offense if the license holder intentionally, knowingly, or recklessly carries a handgun under the authority of Subchapter H, Chapter 411, Government Code, regardless of whether the handgun is concealed or carried in a shoulder or belt holster, in the room or rooms where a meeting of a governmental entity is held and if the meeting is an open meeting subject to Chapter 551, Government Code, and the entity provided notice as required by that chapter." Thus, no person can carry a handgun and enter the room or rooms where a meeting of the THECB is held if the meeting is an open meeting subject to Chapter 551, Government Code.*

***Please Note** that this governmental meeting is, in the opinion of counsel representing THECB, an open meeting subject to Chapter 551, Government Code and THECB is providing notice of this meeting as required by Chapter 551. In addition, **please note** that the written communication required by Texas Penal Code Sections 30.06 and 30.07, prohibiting both concealed and open carry of handguns by Government Code Chapter 411 licensees, will be posted at the entrances to this governmental meeting.*

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
(Minutes Approved at \_\_\_\_\_, 2020 FAAC Meeting)

Committee Members in Attendance	Committee Members Absent	THECB Staff	Audience
Diane Todd Sprague (Chair) Jose Merino (Vice Chair) Zelma De Leon (Past Chair) Shannon Crossland Christine Stuart Carruthers Delisa Falks Karla Flores Paul Galyean - Teleconferenced Heidi Granger - Teleconferenced Bridget Jans Ed Kerestly Tam Nguyen - Teleconferenced Alan Pixley Charles Puls Samantha Stalnaker Kelly Steelman - Teleconferenced Kara Tappendorf Denise Welch Brent Williford  Johnathan Cereceres (Student Rep.) – Teleconferenced	Terry Sheneman Marilyn Abedrabbo (Student Rep.)	Jerel Booker Connie Cooper Rinn Harper Claudette Jenks Ken Martin Lesa Moller DeChá Reid Lourdes Sanchez Leah Smalley Michelle Soto Erin Willig	Raul Cavazos

Agenda Item A. Welcome, Introductions, and Overview of Meeting	Formal Decision/Action Required
Diane Todd Sprague, Chair	Vice-Chair Nominations
<b>Critical Discussion Points</b> <ul style="list-style-type: none"> <li>• Introductions in person and teleconference attendees</li> <li>• Ms. Sprague's term as Chair is coming to an end and she will then serve in the Past Chair capacity and Mr. Merino will become Committee Chair</li> <li>• At the next meeting (Nov. 21), the Committee will consider nominations for Vice-Chair; please be prepared to discuss.</li> </ul>	

Agenda Item B. Consideration of Approval of Minutes from meetings held June 6, 2019	Formal Decision/Action Required
Diane Todd Sprague, Chair	Minutes approved
<b>Critical Discussion Points</b> <ul style="list-style-type: none"> <li>• Committee made a last review of the prior meeting's minutes</li> <li>• Clarification - Ms. DeLeon cited a correction on page 6 – under Senate Bill 499, it was clarified that Zelma and Alan created the letter, Delisa Falks submitted the letter, and Ms. Falks, Chris Myrr, and Jimmy Parker went to the Capitol for support to Senator Zelkin's office.</li> <li>• Minutes were approved – A. Pixley motion to approve; D. Falks second</li> </ul>	

Agenda Item C. Update: Prior FAAC Business	Formal Decision/Action Required
Charles Puls, Deputy Assistant Commissioner	
<b>Critical Discussion Points</b> <ul style="list-style-type: none"> <li>• None at this time.</li> </ul>	

Agenda Item D. Presentation: THECB Chatbot	Formal Decision/Action Required
Erin Willig, Program Specialist, College Readiness and Success	
<b>Critical Discussion Points</b> <ul style="list-style-type: none"> <li>• New project – very excited</li> <li>• The state and Coordinating Board are very invested in the success of college advising initiatives in support of the goals of the 60x30TX.</li> <li>• Effective college advising done at the right time is critical to student success</li> <li>• The virtual advising project is one piece of that puzzle, sharing that project now</li> <li>• In partnership with UT-Austin under the AdviseTexas program</li> <li>• Introducing a chatbot named ADVI –</li> </ul>	

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
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- Launched this past May in South Texas Rio Grande Valley with a set of stop out students that were close to a degree but not yet graduated - going back to 2012
- Have had some success in reaching these students and having conversation about identifying their barriers with returning to college, interests with returning to college, and continuing to talk via text using the textbot and advisers monitoring the program getting them re-enrolled
- Now focusing on using the information we have on how to scale this kind of initiative, nudging is in the news in particular how to scale nudging initiatives, works best when it's done regionally and is tied to something the student recognizes or is connected to their experience so we are expanding in a regional way and thoughtful way using on the ground partners so we're developing some partners now – be able to talk about this in the near future.
- Talking with a number of institutions, entities at the local level, non-profits, and other organizations who support schools including ESCs to think about how we can reach students who may need some basic college information, who aren't getting support, in high school or between HS and college, help them get to the next level in talking to college or re-enrolling
- Who do we want to reach?
  - Generation Z – ages 18-24, coming up after millennials, very tech savvy with high expectations (“tech native”), sees this type of technology as part of their world not separate, seamless – works because it's not a static website, personalized, with suggestive tools in line with their likes
  - Returning students – coming back to college to complete a degree, or to up-skill based on what they need in their careers, these people are very busy juggling jobs and family and other responsibilities. Info needs to be quick and digestible. Need to walk them through current processes that can be difficult.
- Want to free up time and energy for students to focus on learning and progressing toward graduation
- Why a Chatbot?
  - Enables us to meet students when and where they are ready to engage and answer questions
  - We can answer student questions at scale providing accessible information – live peer advisers step in when chatbot cannot answer a question
  - We can work with returning, under-resourced, and other hard-to-reach student populations to identify and overcome obstacles to entering, re-entering, and/or completing their post-secondary education
- We want to work with populations that are under-supported
- Interactive Design Process
  - Knowledgebase and campaign development → testing and troubleshooting → improvements and KB additions → target launch → evaluation and improvements → expansion and ongoing campaigns – this means the Chatbot ADVI will continue to get smarter and smarter!
- How ADVI works – ADVI responds to simple questions such as “Can I drop a class?” or “Will I get a refund if I drop?” ADVI provides general information or tells person where to find specific or more detailed information.
- UT Austin heading up advertising to reach stop out population
- Members expressed interest in using ADVI on their institution's websites.
- CRS is open to hearing from institutions who want to get involved in anyway; institutions can reach out to Erin and the CRS division

**Agenda Item E. Presentation: Overview of College Access Loan Bond Funding**

Ken Martin, Assistant Commissioner/CFO

**Formal Decision/Action Required**

- College Access Loan Program (CAL) – how do we get the money, fund the program, and get it to students.
- B-On-Time phasing out – last year to have funding/issue loans; will service loans for about the next 15 years and any defaulted loans
- TASSP – funded by general revenue; for ROTC programs such as the corps at A&M
- Outstanding loans - B-On-Time has \$180 million and TASSP has \$15 million
- College Access Loan Program (CAL) was authorized in 1988 – created in 1965 under the Hinson-Hazlewood College Student Loan Program - \$1.4 billion in student loans outstanding
- CAL is supported by tax exempt general obligation bonds
- Originally started in 1966 with \$10 million of bonds issued – lasted a couple of years; that amount would last about two weeks now
- Since 1966 THECB has issued over \$3.1 billion in bonds
- Borrower loan payments are used to pay bond debt
- CAL Program is self-sufficient – no general revenue has been utilized to support the CAL program
- All CAL funds are appropriated in the General Appropriations Act via rider
- Current CAL default rate is 5% - it was around 3% up until a few years when THECB began making subprime loans.
- SB 1474 (Tax Exempt Bond Bill)
  - Bipartisan bill that passed unanimously in both Senate and House
  - Increases bonding authority
  - Indexes the project limits to the growth of the state allotment
  - Increases the time to close on bonds (more flexibility on timing of sale)
  - Saves the CAL program \$4 million annually

**Agenda Item F. Discussion: CAL Loan Annual and Aggregate Maximums**

Rinn Harper, Senior Director, Borrower Services

**Formal Decision/Action Required**

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
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- Research over the past 4-5 months regarding annual and aggregate loan limits that affect our CAL program
- As a backup we currently do not have annual or aggregate limits with CAL; the only stipulations are a minimum loan amount of \$100 and maximum annual cost of attendance minus aid
- Wants to look at whether the agency needed to implement an aggregate and annual loan limit
- The agency is not recommending annual or aggregate loan limits – do not worry
- Looking for feedback in case in the future we need to change
- Research – what are others doing in the marketplace/industry
- Looked at 20 agencies that issue private loans and found there really is not an industry standard on aggregate loans
- Industry standard - 60% do NOT have limits set – some do, their minimums are very small amounts from an aggregate standpoint there is not an industry standard with respect to setting those limits
- Looked at detailed analyses of CAL program and spending programs of borrowers in CAL
  - Looked at 2015 – what was the borrowing patterns of our students
  - Graduate vs undergraduate
  - Different school types – public vs private
  - Found 99% of loans made to undergrad students were amounts less than \$40k per year – large balances were a very small percent of students
  - Graduate student loans were mid to upper \$80k
  - Not excessive borrowing on an annual perspective
  - FY15 cohort – reviewed portfolio over next 4 yrs to look at pattern, research did not show excess outliers
  - Default rates are higher with lower loans
  - Default rates tied to lowest borrowing amounts – those are borrowers that withdraw
  - Concluded that from a risk standpoint our portfolio is not at risk from not having an aggregate or annual loan limits, so the decision was made not to move forward and keep the policy of a minimum of \$100 borrowed and annual max is cost of attendance minus the aid
  - If in the future, we have to make a decision and implement annual or aggregate limit we don't want to be in the position to make a hurried decision for institutions to implement
  - if we had to implement this what kind of lead time would institutions need?
    - Panel feedback – 1 year at last
    - Would need to update publications and notify borrowers (Falks)
    - It would probably take a year to implement depending on what time of the year is was; best would be April or May, better than beginning of academic year (Jans)
  - Puls – keep in mind we're assessing risk; the goal is to provide students with support but we all have to take it from a business perspective and manage the risk. If something changed in a way that we felt the risk was too high to continue to allow students to borrow. EMPHASIZE we are NOT doing this, we concluded that it's NOT necessary – we are just talking proactively to be prepared especially since we would need to make an announcement at least 15 months prior to the next academic year, we need to build that into the risk analysis. We have not made any plans – no financial markers or indicators are present yet.
- We are implementing procedures in our operations to target those individuals more aggressively with outreach and support those individuals, know that there is a higher risk with individuals in those lower credit ratings. Working to reduce our default rate
  - Puls - clarifying we are not looking to do aggressive collections; looking to do proactive support at our institutions. We are not in the collections business. Do not misinterpret the word aggressive. Part of what we're looking at right now is that we know our default rate is higher due to an influx of individuals who are at much lower credit levels and so figuring out that piece and seeing how that plays out now that we have increased the credit requirement again that starts to bring the default rate down, but if we did an analysis three years from now and we see graduates with borrowing more than \$40k a year are twice as likely to default as folks who didn't, then that would be a risk piece we would look at. But as Rinn mentioned so far we haven't seen any of those indicators whatsoever
  - Rinn – and as we look at the numbers when you look at thousands of borrowers over this period of time less than 500 actually had loan amounts greater than \$40k when you go further up, greater than \$200k I can count on one hand, so it's not large. We are implementing procedures in our operations to target those individuals more aggressively with outreach and support to assist those individuals to know there is a higher risk associated with lower credit scores – especially that withdrew vs graduating so we can attack those accounts or frequently assist and not only getting them in repayment but keeping them in a successful repayment. Looking at our data helps us determine how we'd use our resources to continue the work for reducing the default rate.

**Agenda Item G. Presentation: TASFA and FAFSA Requirements from the 86<sup>th</sup> Legislative Session**

Jerel Booker, Assistant Commissioner  
Claudette Jenks, Director, College Readiness and Success

**Formal Decision/Action Required**

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
(Minutes Approved at \_\_\_\_\_, 2020 FAAC Meeting)

**Critical Discussion Points**

Overview of HB 3, a public education finance bill under purview of TEA:

- Creates college/career/military outcomes bonus monies, which may be used for college-prep training for teachers and students
- Provides funding for state to pay for one SAT, ACT, or TSIA and an industry-based certification exam for students
- HS seniors must complete and submit a FAFSA or TASFA in order to graduate

The THECB is working closely with TEA to implement HB 3; see TEA website for more info:

[https://tea.texas.gov/About\\_TEA/Government\\_Relations\\_and\\_Legal/Government\\_Relations/House\\_Bill\\_3](https://tea.texas.gov/About_TEA/Government_Relations_and_Legal/Government_Relations/House_Bill_3)

**High school graduation FAFSA/TASFA requirement:**

- Begins with 2021-22 school year
- Allows three opt-out options (by parent or guardian; HS counselor; or self if over age 18); opt-out forms are created locally but must be approved by TEA
- Establishes an advisory board to advise on policy/implementation of FAFSA requirement
- Nominating form to volunteer for HB 3 FAFSA advisory subcommittee: <https://www.txetests.com/acn/ACNForm.php>
- Nov. 14—TEA informational video available (part of months-long video series)
- (The ApplyTexas suite can track FAFSA completion components, so students should ensure they select their high school when filling out applications.)

Questions from Diane: How are school districts implementing the requirement? How is the THECB involved? How are IHE affected?

**Responses:** Pflugerville ISD is implementing the FAFSA/TASFA requirement now, for the 2019-20 school year, with opt-out options. Chad noted that Louisiana has already implemented the policy and that the THECB is researching LA's process, as well as how the requirement will affect enrollment, financial aid projections, etc. Each November, the THECB has a campaign encouraging students to complete both ApplyTexas and either a FAFSA or TASFA. IHEs anticipate a greater influx of financial aid applications. An East Texas institution is helping rural school districts near the Texas-Louisiana border to educate students about the new requirement.

**HB 2140 formally creates the TASFA and that an online version be available**

- Establish electronic TASFA through ApplyTexas system
- Establish advisory committee of financial aid personnel and other stakeholders
- The board of the THECB will adopt procedures for TASFA and develop recommendations
- By Jan. 1, 2021, the board will report the advisory committee's recommendations (committee expires Jan. 1, 2023)
- Maintain online database of institutions that will accept the TASFA (list currently exists on [CollegeforAllTexans](#))
- Note: Student/parent information is confidential and not to be submitted to disclosure

Question from Diane: Will the advisory committee convene or report to legislature on Jan. 1, 2021? Response: Advisory committee must report in 2021, so the committee will convene in early 2020. The THECB is working internally on how to form this committee.

Question on SB 232: Algebra II is no longer required for HS graduation. Will regs be written? Response from Chad: The bill says districts must provide info on consequences of *not* completing Alg II; there may be impact to eligibility for funding or college admission. None of the FA programs state outright that you need Alg II for funding. Districts just need to alert students to possible consequences. Question: What is the purpose behind the "no disclosure of confidential information" aspect of the bill? Response: Collected information can only be used to determine financial aid and is not subject to public information act requests or similar.

Chad: We should determine whether we need two committees that might have dueling purposes: (1) existing TASFA subcommittee of FAAC and (2) new advisory committee for online TASFA. Claudette: Current stakeholders for the online TASFA committee are SFAP, ApplyTexas staff, nonprofits serving students, and others. The online committee will expire in 2023, so it would be a disservice to drop existing TASFA subcommittee. Three key issues for the online TASFA committee are:

- What are mechanics of transferring data from online form to all IHE?
- Current monies for maintaining ApplyTexas come through IHE admission fees. What are costs of creating the online form, and where will monies come from?
- The ApplyTexas data is housed by the University of Texas, but the THECB owns the data. Where will online data go and who will store it?

Chad asks whether FAAC committee should be the online advisory committee. Most members say no; they lack experience with technical pieces. Perhaps the existing TASFA subcommittee may be a better fit. Diane: Opportunity to join the online TASFA committee should be widely publicized to IHE across the state. 24 members is limit for committee size.

Jerel: We must stay focused on the Jan. 1, 2021, date to report back to legislature. Recommend we seek additional guidance from legislature: Is there a rush to implement the online TASFA by January 2021? Or is main goal to have report/recommendations by January 2021

**Agenda Item H. Update: TASFA Sub-Committee**  
Robert Merino, sub-committee Chair

**Formal Decision/Action Required**

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
(Minutes Approved at \_\_\_\_\_, 2020 FAAC Meeting)

**Critical Discussion Points**

TASFA subcommittee formed to assess the existing TASFA. Committee recommendations to the THECB:

- Continue releasing the TASFA; it's a necessary tool for high school students
- Create an online TASFA
- Update the current TASFA (see recommendations from June 6, 2019, FAAC meeting) and ensure it aligns with FAFSA
- Release English version early (Sept. 4) to allow institutions to customize and post on websites; Oct. 1—TASFA available in English and Spanish

The existing TASFA subcommittee members would be a great resource in the formation of an online TASFA advisory committee, per HB 3. Our current subcommittee members represent a range of schools using varied software systems, and many members have expressed interest in the online committee.

**Agenda Item I. Presentation: Texas WORKS Planning Efforts**

Jerel Booker, Assistant Commissioner, College Readiness and Success

**Formal Decision/Action Required**

**Critical Discussion Points**

- The THECB worked with legislators to create Texas WORKS to help institutions meet the off-campus work-study requirement introduced two sessions ago.
- In Texas WORKS, state agencies help administer the funds for off-campus internships.
  - The THECB will work closely with the Texas Workforce Commission (TWC) to create an online portal.
  - We'll piggyback off the existing TWC internship challenge.
  - We'll advertise internship possibilities to companies across the state
  - Employers must demonstrate that their internships helps students attain marketable skills.
  - Allocated funds will help pay for worker salaries.
  - Draft rules completed by end of September.
  - Final rules to come in late fall or early winter.
  - We'll solicit employers to participate.
  - In early spring 2020, students will begin applying.
  - First group of Texas WORKS interns to begin working in summer 2020. Initial group may be small as we work out program kinks.
- Question from Ed Kerestly: Since FY 2020 college work-study funds have been reduced to help fund Texas WORKS, do we still need to meet the FY 2020 off-campus requirement for work-study? Response from Chad: Yes. This bill passed right before midnight on the last day of session, and there's an awkward overlap of timing. Texas WORKS takes effect in summer 2020, so institutions must meet the current off-campus requirement with limited work-study funds. Neither Chad nor Jerel has heard any agency discussion about the off-campus requirement being a core compliance risk concern in the near future.

**Agenda Item J. Presentation: Peace Officers Loan Repayment Assistance program**

Lesla Moller, Senior Director, Student Financial Aid Programs

**Formal Decision/Action Required**

**Critical Discussion Points**

- Overview of the six active loan repayment programs
- Various statutes list loans as LRP—"loan repayment program" or LRAP—"loan repayment assistance program"
- The THECB definition of "loan forgiveness": loan requires a promissory note that includes forgiveness provisions. If provisions are met, then loan is forgiven; if not, then loan must be repaid.
- Advantages of LRP model
- Newest program for peace officers had almost unanimous support in the 86th Texas Legislature
  - We submitted draft rules in July 2019.
  - We will have an online application process.
  - Sept. 1, 2020, is first day peace officers can apply for LRAP.
  - LRAP intended for college attendees, not just college graduates.
  - Not applicable to out-of-state institutions.
- A lot of interest in program; difficult to predict number of peace officers that may apply next year.

**Agenda Item K. Update: Slate of Nominees to be Presented at September Committee on Affordability, Accountability, and Planning**

Charles Puls, Deputy Assistant Commissioner

**Formal Decision/Action Required**



Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
(Minutes Approved at \_\_\_\_\_, 2020 FAAC Meeting)

**Critical Discussion Points**

- Chad presented slate of seven candidates.
- We had a difficult selection process, with a large candidate pool. If you were not selected, it was not for lack of being a great candidate. We focused on representation across all sectors and geographic areas and looked for rotating opportunities so that new institutions can participate.
- If slate is approved by the board of the THECB in October, new members can attend the Nov. 21 FAAC meeting.

Agenda Item L. Update: Data Collection Sub-Committee Samantha Stalnaker, sub-committee Chair	Formal Decision/Action Required
<p><b>Overview of June 12 committee meeting:</b></p> <ul style="list-style-type: none"> <li>• Members had the opportunity to test the new Grant Payment System (some issues/bugs were identified)</li> <li>• Members discussed open and end dates for the 2019-20 FAD Report <ul style="list-style-type: none"> <li>➢ Proposed open/end dates for the 2019-20 FAD Report were identified after this meeting (via email)</li> </ul> </li> <li>• Next committee meeting will take place in the fall (date TBD) <ul style="list-style-type: none"> <li>➢ Members will discuss edits that are identified due to summer grants</li> <li>➢ The 2019-20 FAD Report dates will be finalized.</li> </ul> </li> </ul> <p><b>Grant Payment System Updates</b></p> <ul style="list-style-type: none"> <li>▪ Successful August 1 release <ul style="list-style-type: none"> <li>➢ Over 46M currently requested</li> <li>➢ Some login issues/bugs identified during initial release</li> <li>➢ THECB continuously working to enhance the system – <i>institutional feedback is welcomed</i></li> </ul> </li> </ul> <p><b>Cycle 2 FADS Update</b></p> <ul style="list-style-type: none"> <li>▪ Fifty-seven institutions <b>not</b> validated <ul style="list-style-type: none"> <li>➢ Non-validation of Cycle 2 FADS halts some institutional disbursements for the 2019-20 award year</li> <li>➢ Reminder: Cycle 3 FADS opens September 30</li> </ul> </li> </ul>	

Agenda Item M. Presentation: Review of proposed rules whose 30-day comment period recently ended Charles Puls, Deputy Assistant Commissioner	Formal Decision/Action Required
<p><b>Handouts provided.</b></p> <p><b>Overview:</b> THECB currently performing 4-year review process where all program rules are reviewed to identify applicable updates/changes needed.</p> <ul style="list-style-type: none"> <li>▪ Thirty-day comment period ended <b>August 26<sup>th</sup></b></li> <li>▪ Financial Literacy Advisory Committee (FLAC) <ul style="list-style-type: none"> <li>➢ Repealed – <i>no longer exists</i></li> </ul> </li> <li>▪ Hinson-Hazlewood Program <ul style="list-style-type: none"> <li>➢ Redundant verbiage removed</li> <li>➢ Language aligned with statutory updates</li> </ul> </li> <li>▪ Academic Transcript Hold Requirement <ul style="list-style-type: none"> <li>➢ Repealed – <i>institutions are no longer required to place holds on students who are delinquent in state loan payments</i></li> </ul> </li> <li>▪ Hinson-Hazlewood Program – Prior to Fall 1971 <ul style="list-style-type: none"> <li>➢ Removed several parts of the rule since loans no longer issued</li> </ul> </li> <li>▪ Top 10% Scholarship Program <ul style="list-style-type: none"> <li>➢ Repealed – <i>phased out</i></li> </ul> </li> <li>▪ Physician Education Loan Repayment Program <ul style="list-style-type: none"> <li>➢ Updated to align with the statutory maximum allowed</li> </ul> </li> <li>▪ Non-funded Loan Repayment Programs <ul style="list-style-type: none"> <li>➢ Repealed – not funded in the past 2 biennia</li> </ul> </li> </ul> <p><b>Programs that received Comments</b></p> <ul style="list-style-type: none"> <li>▪ Dental Education Loan Program <ul style="list-style-type: none"> <li>➢ Comment: Concerns regarding repeal of program since it still exists in statute Response: Program will re-occur if funded in the future</li> </ul> </li> <li>▪ General Provisions <ul style="list-style-type: none"> <li>➢ Comment: TX State Univ and TX Tech Univ in opposition to the Descriptive Timing of GPA Calculations required</li> </ul> </li> </ul>	

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
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<p>Response: Staff agrees that TAC, Section 22.10(b) adds unnecessary complications to the SAP calculation – <i>will be removed</i></p> <p>➤ Comment: TX State Univ commented in opposition to the Definition of an Academic Year in conjunction with the GPA Calculation</p> <p>Response: Staff agrees the definition adds an unnecessary complication to the provision – <i>will be removed</i></p> <p>➤ Comment: TX Tech Univ commented on the requirement to include all attempted hours</p> <p>Response: Staff disagrees because the provision includes all “earned” grades which differs from attempted hours – <i>no change</i></p>
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<b>Agenda Item N. Discussion: Proposed updates to Texas Administrative Code</b> Charles Puls, Deputy Assistant Commissioner	<b>Formal Decision/Action Required</b>
<p><b>Handouts provided.</b></p> <p><b>Overview:</b></p> <ul style="list-style-type: none"> <li>▪ BOT Program <ul style="list-style-type: none"> <li>➤ Remove academic transcript hold requirement</li> </ul> </li> <li>▪ Conditional Grant Program – Teacher Texas Program <ul style="list-style-type: none"> <li>➤ Remove all criteria related to issuance of new loans</li> </ul> </li> <li>▪ TASSP Program <ul style="list-style-type: none"> <li>➤ Remove academic transcript hold requirement</li> <li>➤ Reviewing for potential to allow for 5-year programs (e.g., Engineering)</li> </ul> </li> <li>▪ TEOG Program <ul style="list-style-type: none"> <li>➤ Overall re-write of rules – <i>to provide clarity, remove redundancy, and better align with other rules</i></li> <li>➤ No changes in connotation</li> </ul> </li> </ul>	

<b>Agenda Item O. Discussion: Establishing a Sub-committee to Develop Legislative Recommendations</b> Diane Todd Sprague, Chair	<b>Formal Decision/Action Required</b>
<p><b>Critical Discussion Points</b></p> <ul style="list-style-type: none"> <li>• The FAAC committee motioned to establish a subcommittee to develop and track legislation; the motion was seconded and passed</li> <li>• Volunteers were requested</li> <li>• Shannon Crossland was nominated as Chair</li> </ul>	

<b>Agenda Item P. Discussion: Preliminary Considerations for 87<sup>th</sup> Legislative Session</b> Charles Puls, Deputy Assistant Commissioner	<b>Formal Decision/Action Required</b>
<p><b>Critical Discussion Points</b></p> <ul style="list-style-type: none"> <li>• Priority viewed as end date, not priority deadline</li> <li>• For some deadline is “drop dead” date to qualify for Texas Grant</li> <li>• How do we get away from prior deadlines – need more money. Fair and equitable in order to ration resources</li> <li>• Data over several years – does it look any different now than then (March 15)? Did moving the date really make a difference or not? TAMU used December date, for example, so students are packaged earlier</li> <li>• Transfer students are one issue; dates help students know all deadlines</li> <li>• Some schools have a “wait list” because they run out of money before prior deadline</li> <li>• Can we align state aid with federal requirements? Asked schools to look at it.</li> <li>• Populations not served</li> <li>• More funding is needed to serve more students (they award less than target to serve more students) seeking more examples (graduate students) middle income students</li> <li>• Work as a resource – what are benefits and drawbacks of current WS? How do we capitalize on current programs? Looking for committee’s thoughts for improvement</li> <li>• Consider adding: bring TEXAS Grant and TEOG into alignment (i.e. not allowed to use Pell as match) – greater alignment between all programs. What are we trying to achieve with our state programs? (i.e. promise programs). Does covering tuition fees allow students to attend and succeed.</li> <li>• Extensions and waivers need guidance</li> </ul>	

<b>Agenda Item Q. Update: Acknowledging Members whose Terms are Ending</b> Diane Todd Sprague, Chair	<b>Formal Decision/Action Required</b>
<p><b>Critical Discussion Points</b></p> <ul style="list-style-type: none"> <li>• Members whose terms are ending: Zelma, Delisa, Alan, Kara, and Diane</li> <li>• Robert new chair</li> <li>• Nov 21st is the next meeting.</li> </ul>	

Financial Aid Advisory Committee  
Meeting Notes  
September 5, 2019  
(Minutes Approved at \_\_\_\_\_, 2020 FAAC Meeting)

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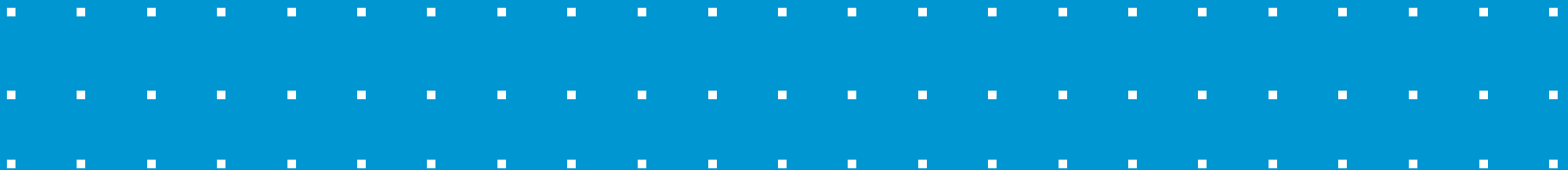
<b>Agenda Item R. Transition of Leadership</b> Diane Todd Sprague, Chair	<b>Formal Decision/Action Required</b>
<b>Critical Discussion Points</b> <ul style="list-style-type: none"><li>• Robert Merino is the next chair</li><li>• She will become past chair</li><li>• Zelma DeLeon is retiring from the committee</li></ul>	

<b>Agenda Item S. Adjournment</b> Robert Merino, Chair	<b>Formal Decision/Action Required</b>
<b>Critical Discussion Points</b> <ul style="list-style-type: none"><li>• Next meeting November 21, 2019</li><li>• Meeting adjourned</li></ul>	



# Texas State Grant Programs: Investigating Strengths and Weaknesses

Sandy Baum  
Kristin Blagg  
Urban Institute  
November 2019



# State Financial Aid Reform Initiative: Goals

Take an in-depth look at state grant programs in a few states to work toward reinforcing their efforts to improve educational attainment

Provide applicable lessons learned to other states

# State Financial Aid Reform Initiative: Design

Funding to Urban Institute from Arnold Ventures for work in Texas and New Jersey

Also creating a website with information from and for all states

Funding to Century Foundation from Lumina Foundation for work in California and Michigan.

In Texas:

Talking to all stakeholders: institutions, advocacy groups, students, policy makers, etc.

Reading existing studies

Analyzing the state's student-level data

# Issues in Texas

Decentralized system leads to focus on institutional allocations

- Uncertainty and lack of transparency

- Concerns about equity of allocations

Requirement that students receiving TEXAS and TEOG have enough grant aid to cover tuition and fees

- Pell counts for TEXAS

- Pell does not count for TEOG

GPA requirement for TEXAS grant differs from requirement for Pell

# Issues in Texas

Difficulties in covering transfer students

Relative generosity of grants for public four-year vs. public two-year students

Questions about how students cover living expenses

Focus on recent high school graduates



# We welcome your thoughts!

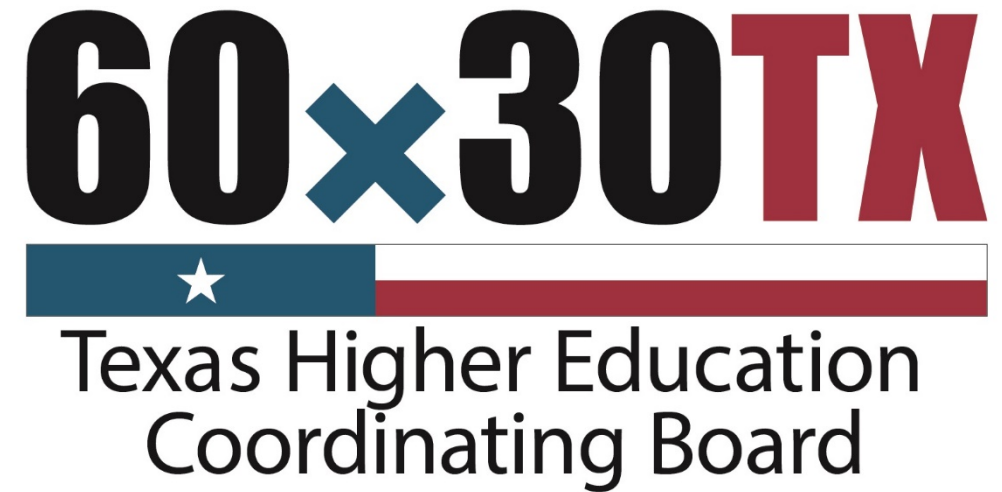
Sandy Baum

[sbaum@urban.org](mailto:sbaum@urban.org)

Kristin Blagg

kblagg@urban.org

# Draft Changes to Rules for SB 887 (85R) Student Debt Letter



Ginger L. Gossman, Ph.D.  
Innovation & Policy Development  
November 21, 2019

# Language from SB 241

SECTION 1.05. Section 52.335, Education Code, is amended by adding Subsection (b-1) to read as follows:

(b-1) A participating higher educational institution is not required to provide in any disclosure or report required under this section information regarding loans issued by a private entity.

# Draft updated rules for debt letter

§21.45 Authority and Purpose – No change

§21.46 Student Loan Debt Disclosure Annual Notification; Effective Date – No change

§21.47 Definitions – No change

§21.48 Student Loan Debt Disclosure Procedure – No change

§21.49 Student Loan Debt Disclosure Required Elements – Change to (b) only

Student loan debt disclosures must include an estimate of the unpaid amount of ~~state, federal, and other federal~~ education loans obtained by the student and state education loans obtained by the student at the current institution ~~if known and reasonably available to the institution, education loans obtained by the student.~~ Student loan debt disclosures may also include an estimate of the unpaid amount of state education loans obtained by the student while attending other institutions and / or education loans obtained by the student from a private or other entity, if known and reasonably available to the institution. The types of education loans must be identified for each total included.

# Purpose of suggested changes

Changes made for clarity

Changes made for SB 241

## §21.49 Student Loan Debt Disclosure Required Elements – Change to (b) only

Student loan debt disclosures must include an estimate of the unpaid amount of ~~state, federal, and other~~ federal education loans obtained by the student ~~and state education loans obtained by the student at the current institution~~ if known and reasonably available to the institution, ~~education loans obtained by the student.~~ Student loan debt disclosures may also include an estimate of the unpaid amount of state education loans obtained by the student while attending other institutions and / or education loans obtained by the student from a private or other entity, if known and reasonably available to the institution. The types of education loans must be identified for each total included.

# Relevant links for rule change

SB 241 (86R):

<https://capitol.texas.gov/tlodocs/86R/billtext/html/SB00241F.htm>

SB 887 (85R):

<https://capitol.texas.gov/tlodocs/85R/billtext/html/SB00887F.htm>

Current (updated) Texas Education Code:

<https://statutes.capitol.texas.gov/Docs/ED/htm/ED.52.htm>

Current (unchanged) Texas Administrative Code:

[https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac\\_view=5&ti=19&pt=1&ch=21&sch=C&rl=Y](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=19&pt=1&ch=21&sch=C&rl=Y)

# Reminder of resources

## **August 28, 2018 Webinar**

Presenters:

uAspire

Sam Houston State University

<http://www.thecb.state.tx.us/apps/events/other-meetings/webinar-on-sb-887-student-debt-letter-implementation/>

## **June 4, 2018 Webinar**

Presenters:

Indiana University

<http://www.thecb.state.tx.us/apps/events/other-meetings/webinar-on-sb-887-student-debt-letter-implementation1/>

# Transitioning support from IPD to SFAP

**Current contact:**

Innovation and Policy Development  
Office: (512) 724-6452

**Future contact:**

Financial Aid Services  
Office: (512) 427-6451

**More information to come.**



# Financial Wellness Learning Collaborative

Erin Willig, MSSW  
College Readiness and  
Success

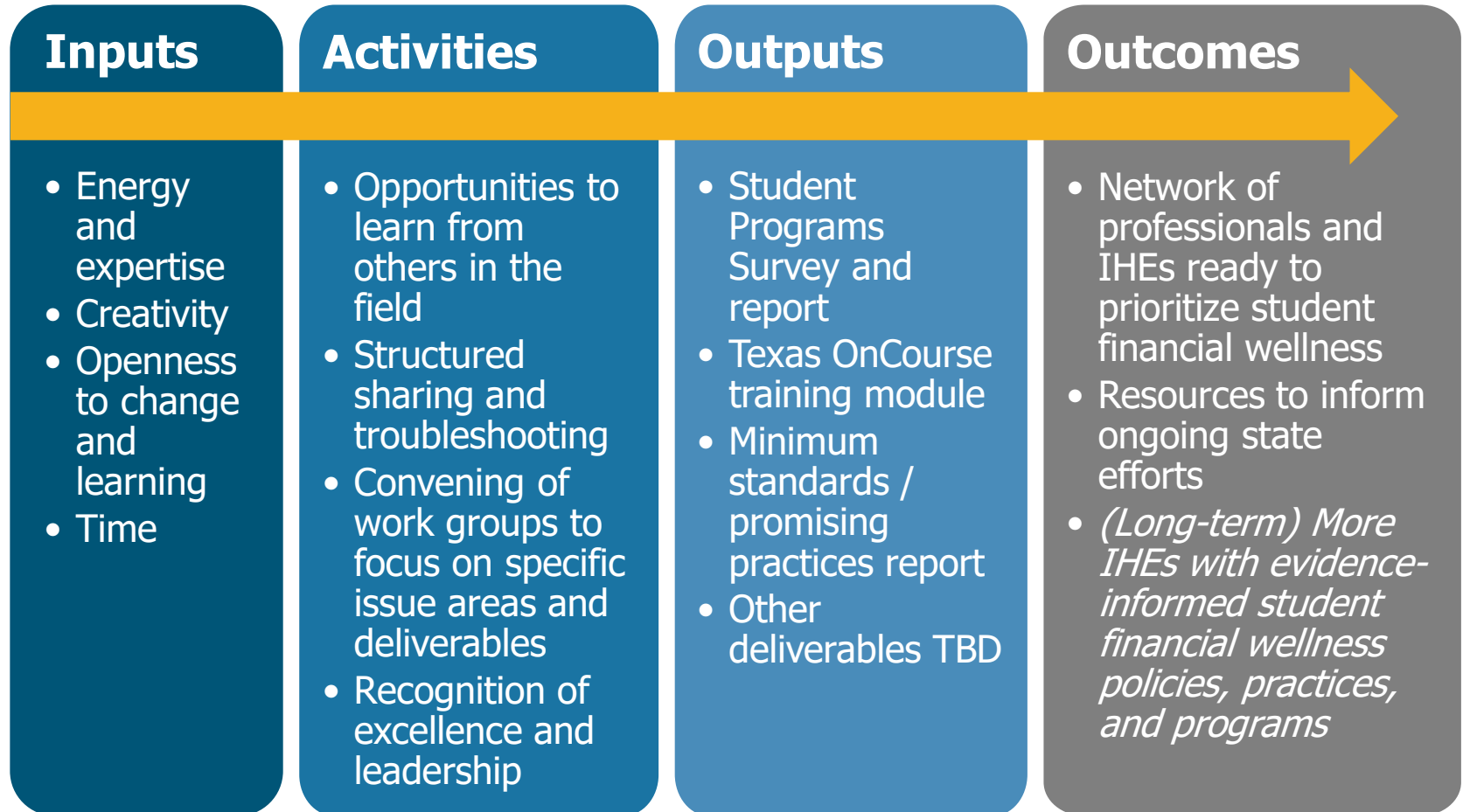


Texas Higher Education  
Coordinating Board

in collaboration with

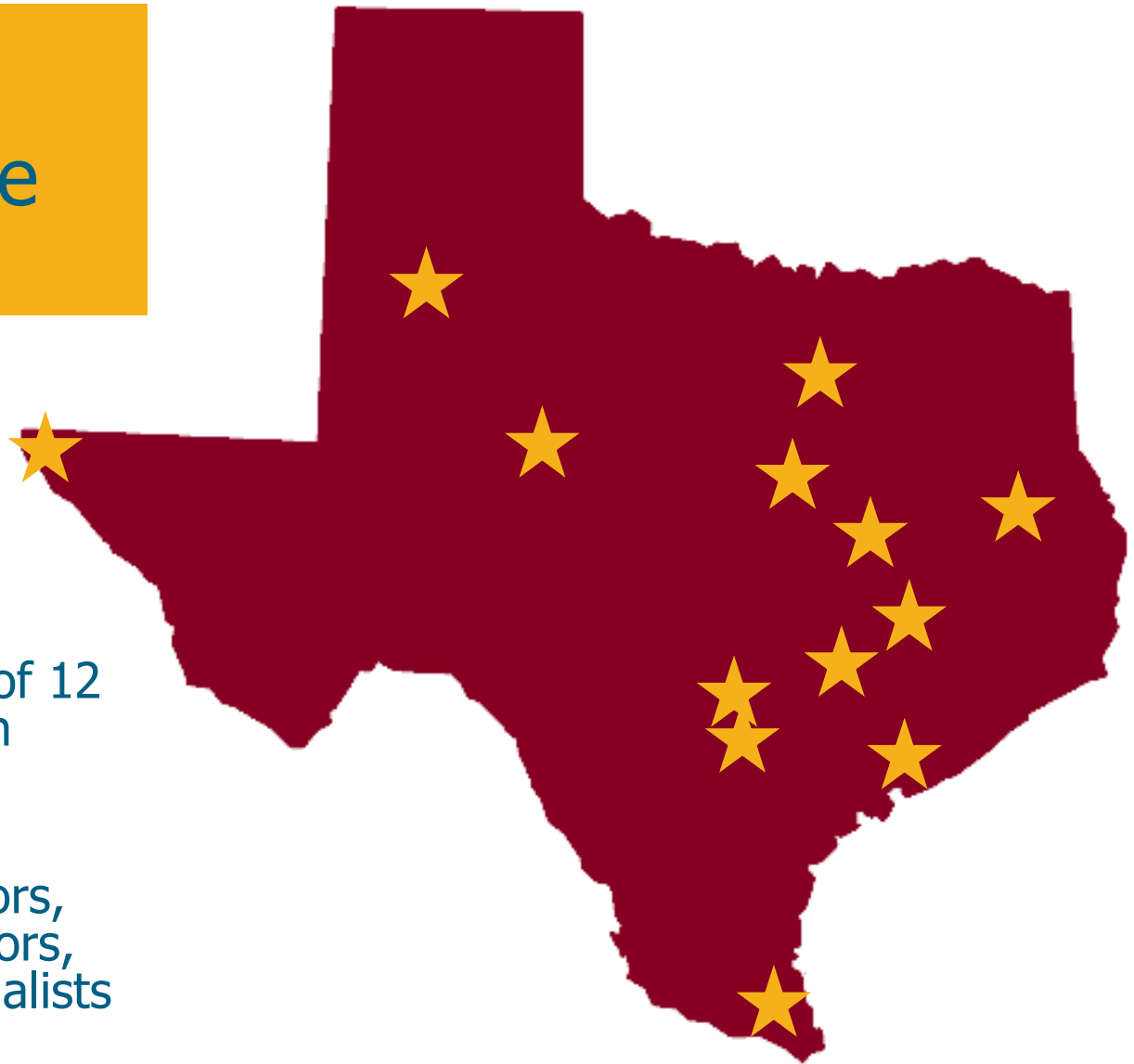


# Learning Collaborative Logic Model



# Learning Collaborative Members

- 13 Members\*
- 4 community colleges
- 9 public universities
- Representing 8 of 12 higher education regions
- Directors, Assistant Directors, Associate Directors, Managers, Specialists and Advisers



# Results of the Collaborative's SOAR Analysis and Action Planning

We are grounded by strong existing programs and fortunate to have leadership, attention, funding and networks of support to draw on.

We have the opportunity to be a leader as a state. We can streamline and support data-driven results and evidence-informed standards.

We aspire to have a systematic approach to educating students about financial wellness. To get there, we need a deep understanding of the big picture and a strong list of best practices and strategies.

The results we seek are tangible positive impacts on student financial wellness.

# Workgroups



## Training Design

Developing a professional development module with Texas OnCourse to train higher education advisers on how to talk to students about financial wellness



## Policy & Procedure

Working to understand key points for policy and procedure changes and improvements



## Student Programs

Conducted survey of student financial wellness programs; will issue report on survey and recommendations for minimum standards for student financial wellness programs and/or a promising practice report

Thank you!

# FINANCIAL AID ADVISORY COMMITTEE

## ANNUAL REPORT

COMMITTEE ABOLISHMENT DATE: 10/31/2021

**Committee Purpose:** The Financial Aid Advisory Committee was created to provide the Board advice and recommendations regarding the development, implementation, and evaluation of state financial aid programs for college students. It also assists staff in the development of training materials for use by the Center for Financial Aid Information and others in informing students, parents, secondary education counselors, college personnel, members of appropriate community-based organizations, and others about financial aid opportunities for Texas students, including eligibility requirements and procedures for applying for financial aid. In addition, the committee shall provide insight on state financial aid program policies and procedures (e.g. eligibility, allocations, disbursement processes, etc.); review the collection, use, and reporting of data; and identify areas of research for consideration.

**Annual Report Period:** November 2018 - October 2019

**Chair:** Diane Todd Sprague – The University of Texas at Austin

**Vice Chair:** Robert Merino – San Jacinto Community College

**Past Chair:** Zelma DeLeon – University of North Texas

### Committee Members and Terms:

Shannon Crossland	Texas Tech	06/19 – 10/31/20	Samantha Stalnaker	Tarrant County College	12/17 – 10/31/20
Karla Flores	UT-Rio Grande Valley	12/17 – 10/31/20	Kelly Steelman	Amarillo College	12/18 – 10/31/21
Paul Galyean	Jacksonville College	12/18 – 10/31/21	Dr. Christine Stuart-Carruthers	TX State Tech	12/17 – 10/31/20
Heidi Granger	UT-El Paso	12/18 – 10/31/21	Kara Tappendorf	Pflugerville ISD	01/17 – 10/31/19
Bridget Jans	University of Houston	12/17 – 10/31/19	Denise Welch	Panola College	12/18 – 10/31/21
Ed Kerestly	Angelo State University	12/18 – 10/31/21	Brent Williford	Blinn College	12/17 – 10/31/19
Tam Nguyen	UNT Health Science Ctr	12/18 – 10/31/21	Marilyn Abedrabbo	Student Representative	06/18 – 05/31/20
Terry Sheneman	Fort Bend ISD	12/17 – 10/31/20	Johnathan Cereceres	Student Representative	06/18 – 05/31/20

### Committee Meeting Dates:

December 6, 2018

March 6, 2019

June 6, 2019

September 5, 2019

### Annual Costs Expended

**Travel:** \$8,988.64

**Other:** N/A

**Member Time Commitments:** 637.5 hours

### Current Recommendations to the Board:

1. Continue to work with the Financial Aid Advisory Committee (FAAC) in providing feedback and recommendations on new initiatives in particular when there would be an implied or real impact on state financial aid program policies and procedures. This is critical to the strengthening of student participation and providing access to higher education.
2. Continue to work with FAAC in seeking feedback on how the State aid program rules and policies could align with Federal policies with an eye to mitigating barriers to students.
3. Continue the work of the Data Collection Subcommittee to review and streamline the collection, use, and reporting of institutional reports to the Texas Higher Education Coordinating Board (THECB).
4. Continue to create and utilize Financial Aid Advisory Committee subcommittees with subject experts to review and identify areas of development/research for consideration of topics of interests.
5. Continue to provide information regarding proposed legislative recommendations so FAAC can provide feedback on potential impact to students in high school and those seeking a postsecondary education.
6. Continue support of tuition set-aside funds.
7. Continue work with THECB in cooperation with FAAC on providing an electronic TASFAA and review the possibilities on providing a student's complete state financial aid history to institutions.

### Summary of Tasks Completed:

Over the course of the year, the Financial Aid Advisory Committee members discussed and provided feedback and recommendations regarding a number of financial aid topics. Highlights included, but are not limited to the following:

- **Implementation of a New Member Orientation** – The FAAC Chair, Past Chair, and Coordinating Board staff provided an orientation for new members to assist in roles, responsibilities and expectations in order to assist new members in being able to participate more fully with FAAC in providing more robust conversation and feedback.
- **Hosting/participating in presentations to FAAC** – Working with Coordinating Board staff, FAAC hosted and discussed a number of presentations relative to innovative or best practices within higher education aid administration. These presentations included the 2019 State of Student Aid and Higher Education in Texas presented by Trellis, proposed legislation on innovative textbook pricing, and the Ethical Dilemmas in Determining the Cost of Attendance. FAAC is very appreciative of the opportunity to hear about and discuss these topics.
- **TASFA Subcommittee** – FAAC's TASFA Subcommittee surveyed TASFAA members and based on survey results the subcommittee proposes the following recommendations:
  - Incorporate the selective service registration statement within the TASFA application and remove the "not registered" option to reduce the likelihood that students will need to make a correction to an already submitted application.
  - Remove the question asking not-tax filers to explain how they supported themselves as this data element has been removed from the verification groups.
  - Add a data element to show money received or paid on behalf of the student's untaxed income which aligns with the Free Application for Federal Student Aid (FAFSA).
- **Data Collection Subcommittee** - FAAC's Data Collection Subcommittee continued to work with the THECB to improve the auto-grants payment process. Modifications to the project eliminate the reporting of student level data since data provided via the Financial Aid Database (FAD) process/report make this redundant. Institutions will report student counts and dollar amounts in order to request funds. Improvements to the application include:



- Allows institutions to see the total approved allocation, the available amount remaining, and a running total of the student count.
- Allows institutions to see which transactions are pending approval by THECB and when refunds are received by THECB.
- Allows institutions to query on all transactions statuses including cancelled transactions.

The Subcommittee discussed the elimination of several data elements within FAD reporting that are duplicative to other agency reports and the need to add a data element to capture summer initial awards on FAD as summer awarding is now an option. The Subcommittee discussed the online loan reporting project proposing that the reports be brought back online and eliminate the manual requests and fulfillment of these reports. This is inclusive of data for CAL, B-On-time and TASSP borrowing.

- **Discussion of relevant bills in progress in 86<sup>th</sup> Texas Legislative session.** FAAC had multiple discussions with staff from THECB on various pieces of legislation prior to and post passage of the bill during the 86<sup>th</sup> legislative session.

A non-inclusive list of the bills discussed include:

- **SB 499** – clarifying that institutions need not include information relative to private loans in debt letters to students
- **HB 3** – requiring that high school students complete a FAFSA or TASFA form or have parents/guardians provide a waiver in order for students to graduate high school.
- **HB 3808** – creates a centralized paid internship program at THECB and removes the current off-campus requirements under TCWS. The bill allows THECB to work with employers across the state to offer paid internship opportunities to students.
- **HB 2140** – whereby THECB must establish an electronic submission portal for the Texas Application for State Financial Aid (TASFA) in conjunction with an appointed advisory committee of financial aid and student representatives to assist with implementation.

The members of FAAC are appreciative of the Board's approval for the continuation of the committee and offer the following examples of why the FAAC is important:

- The opportunity to share information helps both the agency and the institutions gain a better understanding and make better decisions related to higher education financial aid issues/concerns
- Provides a platform to identify key services and to discuss how we can make those services more efficient and successful in the administration of programs supporting Texas residents in the pursuit of higher education.
- Allows members representing all sectors assist in the realization of the State's 60X30 goals
- Provides opportunities to influence research and reporting that will provide relevant data to assist THECB and legislators when considering future proposals relevant to the support of higher education

FAAC Legislative Issues Sub-Committee Activity Report  
November 21, 2019

Purpose: Explore legislative recommendations for the 87<sup>th</sup> Legislative session representative of the various sectors.

Finalize Recommendations: Prior to March 2020. Present to FAAC at the March 2020 meeting.

Sub-Committee Members:

<b>Name</b>	<b>Affiliation</b>	<b>Email Address</b>
Shannon Crossland, Chair	Texas Tech University	<a href="mailto:shannon.crossland@ttu.edu">shannon.crossland@ttu.edu</a>
Robert Merino	FAAC Chair	<a href="mailto:robert.merino@sjcd.edu">robert.merino@sjcd.edu</a>
Victoria Chen	TCU	<a href="mailto:v.chen@tcu.edu">v.chen@tcu.edu</a>
Delisa Falks	Texas A&M University	<a href="mailto:delisa.f@tamu.edu">delisa.f@tamu.edu</a>
Fred Pena	Texas State Technical College	<a href="mailto:fred.pena@tstc.edu">fred.pena@tstc.edu</a>
Kara Tappendorf	Pflugerville ISD	<a href="mailto:Kara.Tappendorf@pfisd.net">Kara.Tappendorf@pfisd.net</a>
Harold Whitis	Alamo Colleges District	<a href="mailto:hwhitis2@alamo.edu">hwhitis2@alamo.edu</a>

Activity to Date:

- October 17 – initial conference call with members. Purpose and timeline were discussed as well as potential topics for recommendation.
- October 31 – conference call with members. Discussed topics for recommendation and grouped topics into categories. Draft sent to members to work on context.

Pending Activity:

- Mid-December - formalize version of recommendations document for group to review.
- Plan conference call for end of January to discuss final recommendations for presentation at the March 2020 FAAC meeting.

Respectfully submitted,

Shannon Crossland  
Chair, FAAC Legislative Issues Sub-Committee

State Deadlines				
<i>Paper</i> or PDF FAFSA			FAFSA® on the Web (FOTW)	
The language in this column is what is displayed to users who view the deadline information on the <i>paper</i> or PDF FAFSA.			The language in this column is what is displayed to users who view the deadline information <b>on FAFSA on the Web and on the Deadline PDF on the web.</b>	
The following 6 rows indicate the symbols on the paper or PDF FAFSA and what the symbols mean on FAFSA on the Web. If a symbol is used on the paper or PDF FAFSA, the accompanying text must be on FAFSA on the Web.				
Symbols on the Paper or PDF FAFSA			Text for symbols on FAFSA on the Web	
a)----(date received)			a)----by midnight, Central Time.	
b)---(*) Additional forms may be required.			b)---Additional forms may be required.	
c)---(♦) Check with your financial aid administrator.			c)---(♦) Check with your financial aid administrator.	
d)---(\$ ) Awards made until funds are depleted.			d)---(\$ ) Awards made until funds are depleted.	
e)---(^) As soon as possible after October 1, 2019.			e)---(^) As soon as possible after October 1, 2019.	
f)---(#) For priority consideration, submit by date specified.			f)---For priority consideration, submit application by date specified.	
g)----(+) Applicants encouraged to obtain proof of mailing.			g)----Applicants encouraged to keep a record of their submission by printing out their online FAFSA confirmation page or obtaining proof of mailing the FAFSA.	
Pay attention to any symbols listed after your state deadline.				
State Abbreviation	Paper Deadline	Column1	State	FOTW Deadline
TX	January 15, 2020 # * Private and two-year institutions may have different deadlines. ♦		Texas	January 15, 2020. For priority consideration, submit application by date specified. Additional forms may be required. Private and two-year institutions may have different deadlines. Check with your financial aid administrator.

## Priority Financial Aid Deadline (TEC §56.008 & TAC §22.6)

### Thoughts for Consideration

- Time-based approaches may have unintended negative consequences for students, such as financially punishing students who have less access to information about financial aid.
- Time-based approaches may dilute strategic funding priorities, compromising the ability to target state dollars. For example, the Priority Model may be impacted if the Priority Deadline takes precedence.
- Time-based approaches often align with traditional enrollment patterns (e.g. fall senior year applications for enrollment in the fall after high school graduation). Thus, time-based approaches may restrict flexibility for non-traditional application and enrollment patterns:
  - alternate enrollment cycles (e.g. starting in spring or summer)
  - alternate application cycles (e.g. enrollment decisions often made in the two to three months leading up to the semester of enrollment for transfer students and for non-selective institutions)
- The state's completion goal relies on direct-from-high-school enrollment, transfer students, and returning students. The state priority deadline may:
  - Impact a school's flexibility to target funds toward all these populations
  - Impact non-time-based eligibility criteria
  - Impact a student's understanding of the aid process when students are involved in the application cycles of more than one educational sector (e.g. private vs. public; two-year vs. four-year)
- House Bill 3 mandates FAFSA/TASFA completion.
  - The priority deadline for financial aid and the deadline for graduation may not align
- Note: *Redesigning State Financial Aid* (August 2018) by the Education Commission of the States goes into greater detail on many of these ideas.

### Feedback Received

- True deadline is inconsistent across institutions
  - Some schools use an even earlier date
  - Some schools use the date as a cut-off date due to limited funding
  - Some schools spend a lot of time explaining that it's a priority, not a cut-off
- The diversity of the types of students makes the priority deadline a difficult process
- Common date may not benefit every institution
- Priority is not a guarantee of funding
- Did moving the date make any difference
- Priority date is serving as a rationing tool
- Some view it as encouragement to get it done, while others view it as deterring students from filing after the date has passed