TO: Biden Transition Team

FROM: Kim Cook, Executive Director, National College Attainment Network

CC: Carrie Warick, Director of Policy and Advocacy, National College Attainment Network (202-347-4848 ext. 203, warickc@ncan.org, @CarrieWarick)

RE: Recommendations for Immediate Action in Higher Education (November 24, 2020)

Thank you for this opportunity to submit additional ideas for administrative action following our October 23, 2020 memo on broad recommendations to improve college access and affordability. These comments are submitted on behalf of the National College Attainment Network (NCAN), a membership association dedicated to closing equity gaps in postsecondary attainment for all students.

With hundreds of organizational members serving more than 2 million students annually in every U.S. state, NCAN advances programs, policies, and systems change that give students the support they need to apply to, enter, and succeed in postsecondary education. NCAN members prove that, with the right guidance, preparation, and financial aid, students from low-income backgrounds, students of color, and first-generation college-goers can complete higher education at a high rate.

In the short term, our nation must conquer the challenges of the novel coronavirus pandemic and the related economic downturn. In the long-term, we already know that our nation needs 60% of adults to hold a high-quality degree or credential by 2025 to ensure a well-educated workforce that is prepared to take on the jobs of tomorrow. Filling these jobs benefits both the individual and society, particularly when the gap in unemployment rates between black and white workers is at a five-year high.

As the incoming Biden Administration considers how to execute its priorities upon Inauguration, we offer these steps as possible administrative action to support college access and affordability.

For more information, please contact: Carrie Warick, Director of Policy and Advocacy, NCAN, at 202-347-4848 ext. 203, WarickC@ncan.org or @CarrieWarick on Twitter.
Student Loans

1. **Continue No Payments/No Interest/No Involuntary Collections on Federal Student Loans**

Given the continued high unemployment and the particularly devastating economic effects on recent college graduates, NCAN recommends extending the current "no payment, no interest, no involuntary collections" policy for federal student loan borrowers, as it will provide relief during a time of instability. The extension should last as long as national emergency plus a period of transition following the end of the emergency declaration. Should this provision lapse at the end of the current Executive Order, it should be restored retroactively through Jan 1, 2021. Further, NCAN will be encouraging both the current administration and Congress to extend this relief so that students do not need to experience uncertainty during the first weeks of January.

**FAFSA Adjustments for Pandemic-induced Economic Downturn**

High school seniors from low-income backgrounds who fill out the FAFSA are three times as likely to continue their education beyond high-school as those who do not. Unfortunately, FAFSA applications are down 16%.

1. **Add a check box to FAFSA for changed circumstances**

Adding a check box to the FAFSA that would allow students to self-select into notifying financial aid offices of a change in financial circumstances from the financial information from their tax filing used for FAFSA purposes would provide immediate benefit. Financial aid administrators would be able to proactively reach out to students rather than waiting for them to file a professional judgment request, and students would receive the message that their changing situation will be taken into account when applying for financial aid.

2. **Create FAFSA signature upload option**

Students are currently completing the FAFSA away from the regular support structures of their high school, college, or college access program. For students whose parents are not eligible to obtain an FSA ID, the challenges are even greater. An FSA ID is required to electronically sign your FAFSA. Students with undocumented parents currently must print and mail the signature page. This poses a problem for many low-income families as they frequently do not have access to a printer. Adding an option to either upload a signature image or to use a touch-screen phone signature would greatly ease the FAFSA filing for these students.

**FAFSA Verification**

Current ED regulations require the verification of the information submitted by a portion of FAFSA filers. This audit-like process currently affects up to 22% of all aid applicants. Roughly half of all filers eligible for a Pell Grant are flagged for verification (contrast this with the fact that the IRS audits less than 1% of
all tax filers with income up to $500,000). According to NCAN’s calculations, as many as 1 in 4 Pell-eligible applicants who are flagged for verification do not complete the process, denying them the financial benefit of a Pell Grant.

1. Extend Verification Relief

Currently, institutions are permitted to accept alternate documentation to ease the verification process during the pandemic. This includes accepting a signed tax return instead of a tax transcript and accept a signed letter of non-tax filing rather than the non-tax filer form 4506-T. NCAN recommends that these relief actions should be extended. Further, Federal Student Aid should actively promote via an Electronic Announcement their use at institutions, many of which use these as options as last resort rather than the default choice for students going through the verification process.

2. Continued adjustment to better targeted and lower verification percentage

For the first four quarters of the 2019-20 FAFSA filing cycle, over 70% of students who completed verification saw no change in their EFC. That number jumps to 9 out of 10 for students who filed the FAFSA and received an auto-zero EFC designation. NCAN recommends that no more than 15% of FAFSA filers be flagged for verification and that those who are selected are targeted among filers with characteristics historically shown to have the biggest shifts in EFC.

FAFSA Professional Judgment

Professional judgment is a little-known option for students to be considered for more financial aid when their circumstances change following the tax year data used for the FAFSA form.

1. Message Professional Judgment Option to All FAFSA Filers

NCAN recommends that Federal Student Aid email or text all FAFSA filers to make them aware of this option.

2. Reinstate GEN 09-05 for treatment of unemployment on FAFSA

Given the increased number of unemployment claims during 2020, NCAN recommends the reinstatement of the policy articulated under Dear Colleague Letter (GEN 09-05) that permitted institutions of higher education to treat all of those reporting unemployment benefits as a class when responding to professional judgment requests.

Support for DACA and DREAMer Students

NCAN believes students of all immigration statuses, including those participating in or eligible for DACA, deserve support in their pursuit of higher education.
1. **Reinstate the DACA Program and Adjust Eligibility Dates Accordingly**

NCAN recommends fully reinstating the DACA program as established in 2012 and adjusting the eligibility dates accordingly so that current or recently graduating high school students are eligible to apply.

2. **Include DACA and DREAMer Students in Any Additional COVID-Relief Aid**

NCAN recommends that DACA and Dreamer students be eligible for COVID relief aid. This includes administrative action to change eligibility for any remaining HEERF dollars and ensuring any future legislative packages are interrupted to include their eligibility. NCAN is encouraged that Unity Task force papers include reinstating, expanding and streamlining protections for Dreamers, as well as ensuring that Dreamers are eligible for Federal student aid.

3. **Develop an Experimental Site to Grant Aid Eligibility for Dreamer Students**

While Congressional action is required to change aid eligibility requirements to allow all DACA recipients and Dreamers to apply for federal financial aid, NCAN recommends that a financial aid experimental site be established to provide DACA recipients and Dreamers at participating institutions eligibility to apply for the Pell Grant. Similar to the Second Chance Pell program, the success of this ex-site could build broader support for granting access for these students.

### College Students and SNAP

Food insecurity is higher among college students than the general population and has only increased during the pandemic.

1. **Allow More Postsecondary Students to participate in SNAP**

NCAN recommends the USDA Food and Nutrition Service (FNS) grant state waiver requests to permit college students who previously were eligible for SNAP but lost their eligibility due to COVID-19-related job loss to remain eligible for SNAP benefits. These waivers should also allow recipients to receive the maximum for their family size while the COVID crisis continues.

### AmeriCorps

AmeriCorps is a key partner of the college access and success field with over 70 NCAN member organizations participating in the AmeriCorps program to secure near peer mentors or other key staff to deliver or support direct service to students.

1. **Continue AmeriCorps Flexibility**

Currently, AmeriCorps volunteers are being granted flexibility over how many hours they volunteer and the time period over which they volunteer. As remote work and school continue to be a necessity, these flexibilities should be extended for the remainder of the national emergency.