



March 15, 2019

Virginia Jo Dunlap
Interim Executive Director and General Counsel
California Student Aid Commission
P.O. Box 419027
Rancho Cordova, CA 95741-9026

Dear Mrs. Dunlap,

On behalf of the California Association of Student Financial Aid Administrators (CASFAA) we respectively submit our concern regarding the California Student Aid Commissions (CSAC) response to Chapter 758 (2017-18 AB 2248)¹ which passed last October and was effective January 1. It requires a qualifying institution to notify new and renewal Cal Grant recipients who enroll in less than 15 units of the definition of full-time and of the maximum time frame of Cal Grant eligibility. This notification is required in writing during orientation, upon annual registration, and online registration and the information “*must be provided to the student with a box for the student to check acknowledging receipt of the provided information.*”

At the CASFAA conference in October, our members expressed concerns regarding implementation challenges of the law as written, in particular the requirement of a checkbox in student information systems which poses technical challenges for enterprise systems, for example. While the law was effective at the start of the new year, our members received information from the then Executive Director of CSAC specifying greater flexibility regarding the timing of implementation. While we appreciate and greatly value our collaborative working relationship with our partners at CSAC, we are concerned about the potential impact of this interpretation provided at the conference. Specifically, the Chair’s comments could potentially lead to various levels of compliance violations across educational institutions, as the state law details specific actions for institutions to remain eligible to administer Cal Grant.

As a leader in policy analysis among financial aid associations with a shared goal of financial accessibility to higher education, we thank CSAC for their shared commitment to student success and the ability for California schools to efficiently administer financial aid.

Sincerely,

CASFAA

[1] https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2248