



April 9, 2020

The Honorable Connie M. Leyva  
 Chair, California State Senate  
 Education Committee  
 State Capitol, Room 2083  
 Sacramento, CA 95814

The Honorable Holly J. Mitchell  
 Chair, California State Senate  
 Budget and Fiscal Review Committee  
 State Capitol, Room 5019  
 Sacramento, CA 95814

The Honorable Kevin McCarty  
 Chair, California State Assembly  
 Committee on Budget, Subcommittee 2 on  
 Education Finance  
 State Capitol, Room 2136  
 Sacramento, CA 95814

The Honorable Richard D. Roth  
 Chair, California State Senate  
 Budget and Fiscal Review Committee,  
 Subcommittee 1 on Education  
 State Capitol, Room 2080  
 Sacramento, CA 95814

The Honorable Jose Medina  
 Chair, California State Assembly  
 Committee on Higher Education  
 1020 N Street, Room 173  
 Sacramento, CA 95814

The Honorable Philip Y. Ting  
 Chair, California State Assembly  
 Committee on Budget  
 State Capitol, Room 6026  
 Sacramento, CA 95814

**RE: Protecting Students' Financial Aid During Ongoing COVID-19 Pandemic**

Dear Chair Leyva, Chair McCarty, Chair Medina, Chair Mitchell, Chair Roth, and Chair Ting:

[Californians for College Affordability](#) is a diverse coalition of higher education advocacy, civil rights and social justice, business and workforce, and statewide student leadership organizations that are united in strengthening need-based financial aid in California so that all students can afford to attend and complete college, allowing the state's workforce to remain competitive. Since 2012, Californians for College Affordability has advocated for increased state investments that ensure state financial aid enables students to attend full time and complete a meaningful credential, and protects those with the least resources from shouldering the biggest burden of college costs and debt. **During the ongoing COVID-19 global pandemic, we urge California policymakers to take targeted steps to ensure that the crisis does not undermine students' eligibility for available financial aid.**

Californians' struggles to afford college have long been documented, with increasing calls and proposals to reform the state's Cal Grant program and invest much more in need-based financial aid. While the COVID-19 crisis may require that California put a temporary pause on such discussions, there are targeted and temporary financial aid reforms that would better position students to persist through the crisis, many of which are in line with recently enacted federal law.

The federal CARES Act, signed into law late last month, took steps to safeguard access to federal financial aid for students affected by the COVID-19 crisis, including by ensuring that academic terms lost to the crisis – through no fault of students – do not count against students' future federal financial aid eligibility. As California colleges focus on delivering virtual course programming and meeting students' escalating needs, California too can take steps to protect students' access to financial aid. **We urge California lawmakers to take the following actions to protect financially vulnerable students' access to state and institutional need-based financial aid:**

- **Waive repayment of financial aid by students who have withdrawn from courses due to COVID-19.** Many financial aid programs include provisions requiring students who withdraw from their courses to repay a portion of their awards. Currently, colleges set their own policies on recovering state and institutional financial aid dollars from students who have withdrawn before a term has concluded. In alignment with the federal CARES Act provisions on federal aid refunds, in cases where students have withdrawn from courses due to COVID-19, neither colleges nor students should be required to repay any financial aid that has already been disbursed.
- **Do not count terms in which students withdrew due to COVID-19 against financial aid limits.** Certain types of financial aid, including but not limited to the state Cal Grant, are only available for a specified number of terms or years. In line with federal CARES Act provisions that exempt incomplete terms against lifetime limits for federal aid programs, state and institutional financial aid awards received during an incomplete term during the COVID-19 crisis should not count against students' lifetime aid limits.
- **Allow financial aid applicants alternative ways of documenting academic merit requirements.** Certain financial aid programs, such as Cal Grants, require applicants to have earned a minimum grade point average (GPA) to be eligible. With many outstanding questions about how student coursework will be graded during the crisis, and in acknowledgement of the unprecedented

challenges students and their families are facing statewide, alternative GPA or merit assessments – ones chosen carefully to avoid disadvantaging vulnerable populations – should be made available for students whose GPAs would otherwise include COVID-19 affected terms.

- **Allow institutions to exclude from Satisfactory Academic Progress (SAP) calculations credits that were attempted but not completed due to COVID-19.** To continue to receive many types of financial aid, students are responsible for demonstrating their ability to make Satisfactory Academic Progress (SAP) in their program, including meeting a minimum GPA standard. For financial aid programs where minimum GPA, SAP, and other academic benchmark thresholds are required, colleges should be given broad flexibility to exempt course withdrawals from calculations without requiring student appeals.
- **Allow interruptions in student enrollment without loss of financial aid eligibility.** During times of unprecedented crises, students – and particularly those who are most vulnerable and under-resourced – may need to stop out of higher education to find work or care for members of their communities. While some financial aid programs already allow students to put their financial aid awards on hold for a specified period of time, enrollment pauses during COVID-19 affected terms should not reduce recipients’ ability to continue receiving financial aid once they reenroll.

We recognize the uncertainty facing lawmakers and analysts as they work towards a 2020-21 state budget. However, to the extent that one-time funds are available, we offer two recommendations for where they are particularly needed at this time:

- **Ensure access to emergency grant aid for undocumented students.** The federal CARES Act will provide over \$800 million to California colleges for emergency financial aid to students, according to American Council on Education estimates. Federal guidance on how these funds may be used is not yet available. However, given that undocumented students are not eligible for federal financial aid, it is possible that colleges will be prohibited from supporting undocumented students with these funds. Should CARES emergency financial aid funds be restricted in this way, supplementing federal CARES funds with state dollars for the purpose of supporting undocumented students would help to ensure that this population is not even further disadvantaged by COVID-19 in their pursuit of higher education. Any amount of state dollars appropriated for this purpose would provide a direct benefit to these vulnerable students.
- **Provide resources for financial aid administration to support students during the COVID-19 crisis.** In addition to compounding students’ college affordability challenges, the COVID-19 pandemic will tax the ability of financial aid offices to provide needed supports and flexibilities, particularly at the California community colleges. Critically, colleges need structures and capacity to dole out emergency financial aid resources provided in the federal CARES Act. Additionally, many families’ financial situations are changing dramatically in the wake of COVID-19, and financial aid offices are likely to face a rush of requests for financial aid awards to be individually adjusted to reflect recent income changes. Consideration of such requests, already allowable under the law, is an important component of protecting students’ access to needed resources throughout the crisis, yet the

personalized attention these reviews require take time and insufficient staffing can thwart students' access to aid as a result.

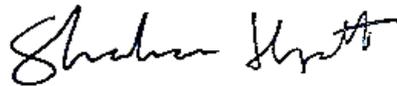
Even under regular circumstances, college is expensive and low-income Californians and underrepresented college students of color are faced with choices that undermine their success or leave them with large debts to repay after they graduate. These same students are now faced with unprecedented uncertainty with respect to their continued education as well as the workforce they will enter after they graduate. Fears that their financial aid eligibility has been penalized due to the crisis need not add to their list of new challenges.

As California continues to bear the severe social, economic, and health burdens brought on by the COVID-19 pandemic, we urge you to consider these recommendations and take the necessary budgetary and/or legislative steps to protect financial aid for students affected by the crisis. Thank you for your consideration.

Sincerely,



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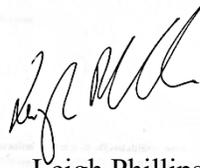
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