

PUBLIC COMMENTS FROM THE FEBRUARY-MARCH 2007 PUBLIC COMMENT PERIOD

IPA Article	Name, School/ Organization	Method of Response	Comment	Response
I Participation	Patricia Duncan, Director of Regulatory Compliance, DeVry University	WRITTEN	"This article requires completion of a new agreement for additional campus locations to participate in Cal Grant programs. We believe that additional locations of an existing, approved institution opened under the same Federal OPE ID number should be added to the institution's existing IPA. This would provide for ease of administration and would mirror the Federal program participation agreement process."	Yes, each time a new location is added, CSAC requires a new signed agreement. This follows federal methodology, but the process differs because USED's system of application is fully automated, and CSAC's is not. Therefore, CSAC does require a new, physically signed agreement. If the original agreement is less than one year old, no additional paperwork will be required from any of the campuses listed on the original agreement, just from the new location(s). If the original agreement is more than one year old, new paperwork may be required from all campuses involved.
I Participation	Steven B. Sample, President, University of Southern California	WRITTEN	"In two instances this paragraph indicates that the Institution is the 'agent' of the Commission for purposes of the Cal Grant Program. The word 'agent' has various meanings, including ones with significant legal connotation. Therefore, USC recommends that this word be stricken or a different word used (i.e., representative, affiliate, etc.)"	This term accurately reflects the legal responsibilities (for example Article IV) the IPA places on the institutions.
I Participation	Tony Ross, Vice President for Student Affairs, California State University, Los Angeles	WRITTEN	"...change of ownership as defined in Article VII,' should be <i>Article VIII.</i> "	Change made.
I Participation	Greg Leis, ITT Educational Services, Inc.	WRITTEN	"What does [any shift in control] mean?"	CSAC is continuing to research this matter.
II General Provisions	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA	II.A.1 – Should read, "The institution is a <i>California</i> non-public postsecondary institution..."	Change made.
General Provisions	Sal Alcalá, Dean Special Services,	WRITTEN	II.A.1 - "Under Paragraph A,1, it appears for future reference purposes that Academic	Until California Education Code (CEC) 69432.7(l)(1) is amended to include other federal programs,

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	Financial Aid /EOPS, Solano Community College		Competitive Grants and Smart Grants should be included. Additionally, there appears to be no reference to the State Work-Study Program anywhere in the document.”	eligibility for Cal Grant participation for non-public postsecondary institutions pursuing this path only includes Pell and two of the three federal campus-based programs: FWS, Perkins Loan, and SEOG.
General Provisions	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC/ WRITTEN	II.A.2 – Should read, “...expends <i>at least</i> ten (10) percent...” The intent is not to exclude any college just because they don’t demonstrate an exact 10 percent. “Do you only allow WASC accreditation? What about other regional accreditation?”	Change made. Added suggested wording. CEC 69432.7.1 (2) states, “Any nonprofit institution... that is accredited by the Western Association of Schools and Colleges... A regionally accredited institution that was deemed qualified by the commission to participate in the Cal Grant Program for the 2000-01 academic year shall retain its eligibility as long as it maintains its existing accreditation status.” The code specifically requires WASC accreditation, and gives allowances for other regional accreditation only in a very limited circumstance. There are no schools which qualify under that allowance.
General Provisions	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC/ WRITTEN	II.D – At the end of the last sentence, “... <i>or until outstanding audits are resolved.</i> ”	Change made.
General Provisions	Sal Alcala, Dean Special Services, Financial Aid /EOPS, Solano Community College	WRITTEN	II.E – “Under Paragraph E, in the spirit of a mutual agreement and fairness to all stakeholders, the California Student Aid Commission should agree to provide all institutions administering state programs timely regulations, guidelines, and workbooks, including regularly offered workshops throughout the state.”	In Article V – Cal Grant Program Administration – Commission Responsibilities, section B is the statement: “Provide the Institution with information, training and ongoing assistance with respect to the Institution’s participation in the administration of the Cal Grant Program.”
General Provisions	Steven B. Sample, President, University of Southern California	WRITTEN	II.I – “With respect to making records available to the Commission for review, USC recommends that the phrase “or at any time at the request of the Commission staff’ be replaced with ‘or at any time during normal	Please see wording included in Articles VII and VIII.

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General Provisions	Sal Alcala, Dean Special Services, Financial Aid /EOPS, Solano Community College	WRITTEN	business hours, upon reasonable advance written notice by the Commission staff of no less than fifteen (15) business days.” II.J – “Under Paragraph J, should the agreement be revised, it should be done in the fashion of a “mutual agreement” or “in partnership with”. As such there should be a clause to cover due process and the opportunity to appeal a decision of discontinuance.”	The sentence, “The Commission shall provide the Institution written notice of its intent to terminate the Agreement ten (10) days prior to such action” was removed, because staff recognized certain situations for termination that would require immediate action by CSAC in order to safeguard State funds and student awards. For all other instances, the Institution will receive notification forty-five (45) days prior to termination per Article VIII.B. An appeal process has been added to Article VII and Article VIII.
General Provisions	Steven B. Sample, President, University of Southern California	WRITTEN	II.J – “The prior version of the Agreement indicated that in the event of termination for failure to comply with law, ‘The Commission shall provide the Institution written notice of its intent to terminate the Agreement ten (10) days prior to such action.’ This language should be re-inserted into the current version of the Agreement, except that the time period be expanded to forty-five (45) days so that it will be in accord with Article VIII, Section B. Thereafter, the Institution should be permitted the opportunity to provide a response and/or evidence related to the Institution’s termination. To that end, USC recommends that the following language be included: ‘Institution’s shall be permitted to submit, and the Commission shall consider, a response to such notice, including any legal and factual reasons why such termination should not occur Such response shall be submitted within fifteen (15) days of receipt of the Commission’s written notice of termination.’”	See above.

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General Provisions	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	II.I – “There should be sufficient timeframe for CSAC to notify Institutions for program compliance review of at least two weeks to gather the records and coordinate with staff.”	Change made. Added the wording, “ <i>Under routine compliance reviews, the Commission will provide a minimum of thirty (30) day’s advance notice.</i> ” It is the usual practice of Compliance staff to contact an Institution ninety (90) days prior to the time of review.
General Provisions	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	II.M – “There should be a provision to allow Institutions a fair hearing and/or appeal to an Administrative Law Judge prior to termination of this Agreement.”	Please see Articles VII and VIII for new appeal language.
III Account Maintenance	Sal Alcalá, Dean Special Services, Financial Aid /EOPS, Solano Community College	WRITTEN	Article III – “In the course of finalizing this agreement, the California Student Aid Commission should seek funding to provide for an administrative allowance for institutions.”	This idea is outside the scope of this document.
Account Maintenance	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC/ WRITTEN	III.A “...Institution-wide responsibility.” I suggest each campus hold a meeting with all personnel before signing.	CSAC supports this comment.
Separate Accounts	Rivka Weinberg, Director of Student Services, Touro College, LA	LA	III.D.1 – We request a third option, that schools have the right to commingle funds, like they are allowed in the federal program, especially since our main branch is in New York.	See <i>Separate Accounts</i> issue paper on the Commission’s website.
Separate Accounts	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSFAAA President	WEB	We recommend giving the colleges the opportunity to choose whether they keep separate or commingled accounts. If that is not possible, CCCSFAAA supports Option 2.	See <i>Separate Accounts</i> issue paper on the Commission’s website.
Separate Accounts	Catherine Graham, Director of Financial Aid, Loyola Marymount; CASFAA Executive Council and Independent	WEB	We would like to support the continued opportunity for private independent colleges to have the choice to commingle.	See <i>Separate Accounts</i> issue paper on the Commission’s website.

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	Representative			
Separate Accounts	Jeff Shelby, Stanford University	WEB	We support commingled accounts with separate ledgers. "We are not going into bankruptcy."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Brad Hardison, Financial Aid Office Director, Santa Barbara City College	WRITTEN	"I have concern in Article III, Section D. I do not believe schools should be required to keep Cal Grant funds in a separate interest bearing account. This creates an undue hardship on institutions who may occur additional costs to comply with this requirement. I suggest the funds can be commingled by Public Institutions and identified and tracked through a subsidiary ledger. I believe the requirement for an interest bearing account should be stricken from the language in the agreement."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Linda Williams, Sierra College	SAC	III.D.1 – "Our accounting folks do not support separate accounts."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Jacqueline Bradley, Assistant Dean, Financial Aid and EOPS, Mendocino College	WRITTEN	<p>"I am very concerned about the requirement to keep Cal Grant funds in a separate interest bearing account and return the interest to CSAC. When I attended the Commission meeting where this was initially proposed, college and university representatives that were present asked if there had been any data gathered on how much money this would cost the college (not just in fees, but administration of the process as well) and how much CSAC hoped to recoup. There was no data available at the time and I have not seen a report since.</p> <p>I do understand that some very large colleges and universities have drawn down large amounts of money that they have not reconciled and returned in a timely manner. I do not understand however, why the entire higher education system should be burdened with a process such as this. CSAC could follow the federal government's example of increasingly restrictive processes for those who do not meet</p>	See <i>Separate Accounts</i> issue paper on the Commission's website.

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			the deadlines or follow the process. If an educational institution fails to return money in a timely manner, move them to a pay-then-draw down process, so they only receive funds for students paid. CSAC should enforce their reconciliation policy; provide an opportunity for colleges to return the money when they reconcile and not wait until an artificial date. What about colleges who normally pay the students and then draw down the funds? While this proposal may respond to your audit, it is not an effective response.”	
Separate Accounts	Lois Madsen, National Director of Financial Aid, Concorde Career Colleges, Inc.	WEB	(speaking for Concorde schools only) We are responsible for managing the Cal Grant Program for our California campuses; most private for-profit schools prefer separate accounts, and we will continue to keep ours separate.	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Derek Thomason, Director of Student Financial Services, Fresno Pacific University	WRITTEN	“We have met and conferred and Fresno Pacific University favors option 1 in point D of article III.”	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Patricia Duncan, Director of Regulatory Compliance, DeVry University	WRITTEN	“We believe that public and private institutions authorized to operate and grant degrees in California should be treated equally. The requirements should not differentiate by sector. Institutions that can demonstrate their accounting records accurately track the Cal Grant funds, and can produce records of those funds as if they were in a separate account, should be allowed to commingle Cal Grant funds with funds from other sources. A separate account for Cal Grant funds should be required only if the institution has failed to meet acceptable standards or cannot demonstrate administrative capability.	See <i>Separate Accounts</i> issue paper on the Commission's website.

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			At DeVry University, Cal Grant disbursements are posted to students' accounts prior to actually receiving funds from the state. In essence, DeVry is funding the students and then receiving reimbursement from the state. Because the funds are requested after the disbursements have been made to eligible students, we believe that the requirement for institutions to hold Cal Grant funds in an interest-bearing account at a financial institution in California to be overly prescriptive. This should be required only of at-risk institutions or those deemed to be lacking administrative capability."	
Separate Accounts	Steven B. Sample, President, University of Southern California	WRITTEN	"There appear two different 'options' with respect to account maintenance—Option One treats all institutions similarly, while Option Two indicates that public institutions may commingle Cal Grant funds, but private institutions may not. Since USC is not aware of any reason why the Institutions should be treated differently on this issue, USC recommends the adoption of Option One."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Nancy Davis, Financial Aid Director, San Bernardino Valley College; regional representative for CCC Chancellor's Office and CCCSFAAA	WEB	People in my region have done some research and commingled accounts with separate ledgers seem to be what fiscal people would like to see. Option 2 is the preferred method.	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Cindy Castillo, Director of Financial Aid and Scholarships, De Anza College	WRITTEN	"Article III. D. Option 2 is preferred."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate	Andres Guerrero,	WRITTEN	"We are in support of continuing with option 2	See <i>Separate Accounts</i> issue paper on the

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Accounts	Director of Accounting, Los Angeles Community College District		(Item D (1)), 'The institution shall hold all Cal Grant funds... according to one of the two designations:' We need to continue to have the flexibility to have a separate bank account or 'commingle Cal Grant funds ...but must identify the Cal Grant funds through a subsidiary ledger.'	Commission's website.
Separate Accounts	Pat Vercruyssen, Financial Analyst, CSU Sacramento	SAC	(from the accounting office; speak for CSUS specifically, and all CSUs in general) III.D.1 – Our Chancellor's Office might not allow us to have a separate account for Cal Grant; given only these two options, possibly we will strongly support Option 2	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	"We recommend Option 2."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Kimberlee Reilly	WRITTEN	<p>"In Article III section D of the Draft IPA, San Diego State University would fall into the category of Option 2 since we do commingle our funds at the bank, but we are able to track all Cal Grant funds in our General Ledger system in a separate fund.</p> <p>"At SDSU, we have been tracking the cumulative balances due/cash on hand for Cal Grants on a monthly basis. The majority of months show funds that are due to the university by the Student Aid Commission. If interest is to be charged, we would recommend that it be calculated yearly to include the months where funds are due to the university or that we include the negative amounts in our calculations if we are required to calculate the interest on a more frequent basis.</p> <p>"In the future will we be able to draw down our</p>	See <i>Separate Accounts</i> issue paper on the Commission's website.

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			funds based on our disbursements as we do for our federal funds? This process allows us to receive our funds within a day or two. This process might eliminate the need for interest calculation since the money received would be based on actual disbursements.”	
Separate Accounts	Shirley Brady, University Controller, Cal State San Marcos	WRITTEN	<p>III.D –</p> <p>“1) all checking and savings accounts have a monthly maintenance fee</p> <p>2) if we structured a stand alone group of accounts that could receive an earnings credit rate to offset fees, you cannot also earn interest. It is one or the other.</p> <p>3) no bank will allow these accounts to be overdraft for more than a day.</p> <p>4) if CSU wanted to attach these accounts into your ZBA structure to fund the shortfalls, that'd be okay. But again, you can't earn interest as the ZBA structure already gets earnings credit.</p> <p>5) I considered a savings account of some sort, but those too have fees and a restriction of 6 withdrawals/month (only 3 of which can be checks)</p> <p>6) My best suggestion would be a stand alone ZBA structure if you absolutely need interest paid. But then CSU would have to pay the bank fees and be responsible for keeping the account out of overdraft position.</p> <p>7) The interest rate on a business checking account for a non-profit is about 1.77% per annum. Earnings Credit rate is running about 5%. The cost for a bank account is \$5/month. We'd need to do the math with number of accounts and balances to figure which is more advantageous.”</p>	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Gilda Maldonado, Financial Aid Director, San Diego	WEB	After speaking with all members in my district (region 10), we would prefer Option 2.	See <i>Separate Accounts</i> issue paper on the Commission's website.

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Separate Accounts	Mesa College Mary Gill, Consultant, State Assembly Higher Education Committee	WRITTEN	"We clearly heard in the public discussion that public institutions favor Option 2, with CSU clearly noting that Option 1 might be costly and interfere in their new revenue management system. Unless there are legal problems with Option 2, I would urge its selection to keep public higher education costs under control."	See <i>Separate Accounts</i> issue paper on the Commission's website.
Separate Accounts	Sophia Toney, Financial Aid Manager, City College of San Francisco	SAC	III.D.1 – (Referring to GSA 2007-06 from February 16, 2007) Commission staff cites bankruptcy as a reason for separate accounts. "How many bankruptcies has CSAC experienced? Even the feds do not want us to keep separate accounts. Don't ask the schools to eat the expense."	See <i>Separate Accounts</i> issue paper on the Commission's website.
California Financial Institution	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA	III.D.1.a – Does the account have to be in California? "That's not a problem for us now, but with mergers and sales, the corporate may be taken out of state."	See below.
California Financial Institution	Rivka Weinberg, Director of Student Services, Touro College, LA	LA	III.D.1.a – Concerning a bank in California, "How about a bank with a California presence?" Touro's main branch is in NY; can they just use a bank like Bank of America which has a presence in CA, even though the account is actually in NY?	Change made. Wording changed to "...a financial institution <i>with a presence</i> in California..."
California Financial Institution	Greg Leis, ITT Educational Services, Inc.	WRITTEN	III.D.1.a – "Does this have to be a California bank or financial institution?"	See above.
Negative Balances	Pat Vercruyssen, Financial Analyst, CSU Sacramento	SAC	III.D.1.b – (quoted GAC recommendation) we might incur negative balances depending on when we are required to make awards compared to when funds are advanced; if we have to front the money, I am concerned. (Quoted again from the GAC recommendations, p.5) "Just-in-Time – what is the time for implementation? One year? Two?"	See <i>Interest-bearing Accounts</i> issue paper on the Commission's website.

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Negative Balances	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	"There should be consideration for any negative interest which accrues if Institutions advance Cal Grant funds to students prior to receiving reimbursement by the State."	See <i>Interest-bearing Accounts</i> issue paper on the Commission's website.
Negative Balances	Catherine Graham, Director of Financial Aid, Loyola Marymount; CASFAA Executive Council and Independent Representative	WEB	Recommend the Commission consider both positive and negative interest as we hold and cover the Cal Grant funding for our students.	See <i>Interest-bearing Accounts</i> issue paper on the Commission's website.
Negative Balances	Sean Smith, Director of Financial Aid, Scripps College	WRITTEN	"Scripps College specifically supports that the calculation of interest on Cal Grant funds held on the campus recognize both positive and negative balances."	See <i>Interest-bearing Accounts</i> issue paper on the Commission's website.
Negative Balances	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	SAC	(responding to another comment about fronting money and incurring a negative balance for CG funds) The 95% advance is never enough; the Cal Grant program is growing, there are more students at CSU every year who receive CG.	CSAC conducted a study on take rates in 2006 which showed that the historical method (95% of the previous year's term advance) met the needs of the greatest number of schools. While CSAC recognizes it is not an ideal method for all schools, CSAC is attempting to accommodate in the best way possible. With the onset of the Real-time Database, this issue may be resolved.
Negative Balances	Mary Gill, Consultant, State Assembly Higher Education Committee	WRITTEN	"Institutions pointed out that Cal Grant Funds in their possession might earn interest, but also that the current allocation system (only 95% of the previous year up-front) sometimes results in institutions needing to front money for Cal Grant awards and there are situations of interest being lost on institutional funds. It seems appropriate and fair to work out a system that recognizes negative balances as well as positive balances in this new initiative to collect interest on Cal Grant monies."	See <i>Interest-bearing Accounts</i> issue paper on the Commission's website.
IV A Confirmation of General	Cindy Castillo, Director of Financial Aid and Scholarships,	WRITTEN	"We are not sure why this is such an expanded section. The previous version said we agreed to 'Confirm and document that students listed on a	A large number of responses to the May-June 2006 IPA public comment period requested greater detail to Section A – Verification of Eligibility and Section

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Eligibility	De Anza College		Commission roster or other award notification meet basic eligibility requirements including California residency, financial need and appropriate program eligibility.' What is the purpose of the expanded section? Are there key issues in the expanded version that were not included in the previous version? We have always resolved conflicting information, what is different?"	B – Confirmation of Eligibility. CSAC staff looked at previous IPAs, the Cal Grant Program Manual (CGPM), California Education Code (CEC), and conferred with GAC for guidance to specify eligibility requirements. All inclusions, save two, in the proposed IPA for 2007, have been in the CGPM since 2003 or before. The exceptions are IV.A.13 (Community College Transfer Entitlement Award 10% Verification) which was added due to the passage of AB 840 set forth in CEC 69436.(d)(3)(B) and IV.A.14 High School Graduation Certification which was added due to recent scrutiny of other programs..
Confirmation of General Eligibility	Sal Alcalá, Dean Special Services, Financial Aid /EOPS, Solano Community College	WRITTEN	<p>“Under paragraph A, in general, the California Student Aid Commission should move toward incorporating language on the grade point verification if a paper version would still be employed. This form would collect, up front, the self certification from the student of the following:</p> <ul style="list-style-type: none"> • U.S. citizen or an eligible non –citizen • Meeting Selective Service requirements • Validity of Social Security requirements • Legal California state residency <p>“If the paper version of the grade point verification form will no longer be employed, I urge the California Student Aid Commission to make every effort to assist secondary schools to be able to electronically transmit grade point averages for their students as is the expectation of the California Student Aid Commission of the 109 California Community Colleges. How other postsecondary institutions are required to report grade point averages is unclear to me. The ability of so many more underrepresented students in secondary schools to gain access to the Cal Grant Entitlement would be greatly</p>	<p>Citizenship, Selective Service, and Social Security are addressed through the FAFSA.</p> <p>Discussion of these issues would be best handled comprehensively in other forums such as the Grant Advisory Committee.</p>

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			<p>enhanced if all secondary schools could transmit the grade point average electronically. Were this the case, the California Student Aid Commission, could have each secondary school forward a signed certification for the element listed above. Again, this would be validating the information up front.</p> <p>“The other option is to have the student sign such a certification indicating that they meet all the elements as outlined by the California Student Aid Commission. Again this would be a front-end transaction at the time a student is offered an award by the Commission.”</p>	
Confirmation of General Eligibility	Steve Maradian, President, Los Angeles City College	WRITTEN	<p>“The revised Institutional Participation Agreement clearly states the institutional responsibilities in administering the Cal Grant program. The information contained on the document will assist our institution in making sure that Cal Grant funds are appropriately disbursed to eligible students attending Los Angeles City College.</p> <p>“In 2005-2006, our institution disbursed a total of 1.2 million dollars to 1,003 eligible Cal Grant B and C recipients, a growth of about eight (8) percent in total dollars disbursed from the previous 2004-2005 academic year. The amount of institutional responsibilities listed on Article IV of the new Institutional Participation Agreement appears to be substantial. With limited campus resources, our institution will be faced with the daunting challenge of keeping up with the growth in our Cal Grant program recipients and the difficulty of carrying out the institutional responsibilities as specified on the proposed agreement.</p>	As stated above, the amount of institutional responsibilities has not grown insomuch as it has been clearly outlined for the first time in a single document.

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			<p>“Our students have clearly benefited from the Cal Grant programs. They will benefit more if the California Student Aid Commission provides institutions with an administrative allowance to cover the cost of staffing, postage and check printing associated with the delivery of Cal Grant funds to students. With the implementation of the new Institutional Participation Agreement and without an administrative allowance to cover the cost of administering the Cal Grant programs, many of our students may experience a delay in the delivery of their Cal Grant funds.”</p>	<p>CSAC understands the administrative efforts expended for California students and the Cal Grant Program; unfortunately, the State of California has not provided an administrative allowance in the budget for such costs. Therefore, CSAC does not have the authority to cover institutional costs.</p>
Confirmation of General Eligibility t	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA/WRITT EN	<p>IV – The format is confusing, because I didn’t know how points related to one another, or if they related. First paragraph states, “at the time of disbursement,” but sections B and C do not only refer to time of disbursement. So take the clause, “at the time Cal Grant funds are paid as a Cal Grant award to the recipient or to the recipient’s account,” down into section A</p>	<p>Change made. First paragraph was removed and the phrases “<i>at the time Cal Grant funds are paid as a Cal Grant award to the recipient or to the recipient’s account,</i>” and “<i>prior to disbursement</i>” were added to the last sentence of IV.A.</p>
Confirmation of General Eligibility	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC/WRIT TEN	<p>IV.A – Recommended wording, “Confirm that <i>there are no conflicting data to indicate the recipient does not meet all</i> eligibility and program requirements <i>as specified in this agreement</i> using all existing information <i>at the time of disbursal...</i>”</p> <p>“Using ‘all’ in this agreement is inaccurate...there are program requirements (such as high school GPA) that are not the responsibility of the institution. The agreement specifies the requirements in the following sections.”</p> <p>“The standard practice is to hold an institution accountable for what it knows when making payment.”</p>	<p>Changes made. See below.</p> <p>Added wording, “<i>specified in this agreement.</i>”</p> <p>Removed the word all.</p> <p>Added “<i>prior to disbursement.</i>”</p>

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			<p>“The institutions are obligated to report conflicting information (see the final sentence of this paragraph). This is a bit different from confirming eligibility that may carry the connotation of proactive verification.”</p> <p>“Also, the ‘etc.’ in the parentheses should be removed as it is ambiguous in a legal document.”</p> <p>Spell out the documents. For example, the G-8 should be included.</p>	<p>Removed etc. and added wording “<i>including, but not limited to.</i>”</p> <p>As a result of discussions with GAC, the list of documents was abbreviated. Staff believes the wording “student self-certification” includes the G-8.</p>
Confirmation of General Eligibility	Linda Williams, Sierra College	SAC	IV.A – (Verification of responsibilities) “Is this asking if Cal Grant students don’t fall in the federal 30% (required for verification)...Do we have to do all verification for them?” Training, staffing issues, student access, space, etc. A ton of stuff is being shifted to us.	Per Article IV.A, in agreement with the FSA Handbook Vol. 1, p. 13 and The Blue Book, Chapter 10, pp. 142-143, institutions are responsible to resolve conflicting information (“discrepancies” according to the Blue Book) the institution possesses. Given documentation already available to the institution (ISIR, student self-certification, etc), the schools are not being asked to seek secondary confirmation unless there are conflicts affecting student eligibility.
Confirmation of General Eligibility	Cecilia Kwan, Los Angeles Trade Technical College	LA	IV.A – All the criteria should be clearly spelled out in the Cal Grant Program Manual (CGPM) like in the Federal Student Aid (FSA) Handbook. For example, a Financial Aid Officer may think income ceilings are derived from AGI. Residency criteria should be included in the CGPM. It is too brief and confusing.	CSAC supports this idea, and staff plans to begin updating the CGPM upon completion of IPA revision.
Confirmation of CA Residency	Chris Cortes, Director of Financial Aid, Reedley College	WRITTEN	“Since the Admissions and Records Office does determine a student’s residency status, any verification of that status should be done by their office. If the FA Office discovers discrepancies, they would be responsible to resolve that information working with the A&R Office. CSAC would need to provide clear definitions of residency statuses and address	<p>CSAC supports this idea.</p> <p>The CGPM and training would be good places to address various residency and nonresidency scenarios. CEC identifies a large range of exceptions to residence determination which will need to be addressed. Staff also welcomes input from stakeholders.</p>

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			the various scenarios such as minor students who are US Citizen with undocumented parents.”	
Confirmation of CA Residency	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	IV.A.6 – CA residency for private institutions needs further clarification; need proprietary and independent input.	See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Gail Modder, Program Manager, Admissions and Records, Sierra College	SAC	IV.A.6 – Request similar definition be used. The CCC population is a transient population; they often have breaks of attendance; we reevaluate residency upon re-registration.	See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	WRITTEN	IV.A.6 – “Having different dates of residency for different institutions can eliminate the portability of the grant. There needs to be one consistent date of state residency.”	See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Rivka Weinberg, Director of Student Services, Touro College, LA	LA	IV.A.6.ii – September 20 of what year? Would like a list of possible documents to gather, as many as possible.	Change made. Added wording, “ <i>of the award year (i.e., September 20, 2007, for the 2007-08 award year).</i> ” See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Lourdes Oropeza, Cal Grant Coordinator, Fullerton College	WEB	Residency is determined by Admissions and Records.	Once residency is determined by Admissions, the Financial Aid Office is simply responsible to work with Admissions to resolve conflicting data. See comment above from Chris Cortes, Reedley College. If no conflicting information arises, nothing further needs to be done.
Confirmation of CA Residency	Eugenia, Riverside College	WEB	Residency is determined by the Admissions Office. Are you saying the Financial Aid Office has to do this as well?	See above.
Confirmation of CA Residency	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSF AAA	WEB	In the California Education Code (CEC), our Admissions Office is responsible for checking residency; on our college it is on the ASP system in DataTel, and we check that before disbursing.	CSAC supports this process.

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Confirmation of CA Residency	President Mary Gill, Consultant, State Assembly Higher Education Committee	WRITTEN	IV.A.6.ii – “Regarding residency confirmation obligations of private institutions: The IPA only says ‘September 20’. It doesn’t say which year, nor specify any criteria to define ‘legal California state resident’ (as specified for public institutions). If private institutions are solely obligated to rely on the self-reported item on the FAFSA, then that should be clearly stated.”	See wording change above. See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Steven B. Sample, President, University of Southern California	WRITTEN	IV.A.6 – Private nonprofit and for-profit institutions do not regularly determine California residency as a part of the financial aid eligibility determination for students. Therefore this section should be stricken. USC recommends that the Commission determine residency prior to the awarding of Cal Grants to students based on the information provided by the student on the FAFSA. This information includes: <ol style="list-style-type: none"> 1) Student and parent reported state of legal residency 2) The dates students and parents became residents of California 3) The student’s date of birth” 	See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	“This should be removed from the Institutional responsibilities. There currently is a difference of opinion in the financial aid community and CSAC regarding the responsibility and definitions of California residency requirements as it relates to enrollment fee and Cal Grant purposes as documented by GAC.”	See <i>California Residency</i> issue paper on the Commission’s website.
Confirmation of CA Residency	Olivia Garcia, Counseling Supervisor, UC Irvine	PHONE	Will renewal students be grandfathered in for the California residency criteria? For CCC Reserve Cal Grant A: will four-year institutions receiving transfer students who have spent 2-3 years at a CCC, be required to reestablish California residency?	CSAC will audit for the new California residency criteria for new awards beginning in the 2007-08 award year. Yes. CEC 69434.5 states that, “Upon receipt of a request to transfer the award to a tuition or fee charging qualifying institution, the individual shall be eligible to receive the Cal Grant A award previously

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				held in reserve if, at the time of the request, he or she meets all of the [eligibility] requirements of this article." So residency needs to be confirmed at the time of the activation of the award at the tuition or fee-charging institution.
Confirmation of Income/Asset	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	IV.A.12 – Aren't income/asset ceilings a CSAC responsibility?	CSAC does check income and asset ceilings and makes a preliminary award offer based on the first eligible ISIR, but a student may make income/asset changes to subsequent ISIRs which may make them ineligible by exceeding the income/asset ceilings.
Confirmation of Transfer Entitlement	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	IV.A.14 (Transfer Entitlement) - Lot of tension; should be Web-based.	See below.
Confirmation of Transfer Entitlement	Chris Collins, Associate Director, Office of Financial Aid and Scholarships, San Diego State University	WRITTEN	Article IV.A.14 – “We propose that the confirmation of a Community College Transfer Entitlement applicant as a California high school graduate be a CSAC responsibility. Our institution is like most in that we do not collect high school transcripts for students who transfer to SDSU after completing work at another postsecondary institution. As a result, it is currently incumbent upon us to contact the student and request additional information about their high school record which has no bearing on their attendance at SDSU. It would be timelier and more efficient, in our view, for CSAC to collect this information at the time that the student identifies themselves as a candidate for a Community College Transfer Entitlement Award. Therefore, we believe this item should be moved to Article V -Commission's Responsibilities.”	Change made. Wording as it was included in the February 16, 2007 draft IPA was moved to Article V – Cal Grant Program Administration – Commission Responsibilities. Added to Article IV. A.13 is the wording, “ <i>The California Community College Transfer Entitlement recipient randomly selected for verification pursuant to CEC 69436 (d)(3)(B) meets eligibility criteria.</i> ”
Confirmation of Transfer Entitlement	Deborah S. McCracken, Director, Financial Aid	WRITTEN	“Article IV. Provision A, 14: the preference for confirmation of California residency at the time of high school graduation for a community college transfer entitlement award is for this	See above.

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	California State University, Fullerton		item to be moved to Article V—Commission’s responsibilities. There is concern about the significant workload that would be presented because of the needed practice to resurrect residency information from a minimum of 2 years earlier. Many transfer students may have gained California residency status during their community college experience and their previous ineligibility due to non-resident status may not be apparent at the transfer school.”	
Confirmation of Transfer Entitlement	Steven B. Sample, President, University of Southern California	WRITTEN	IV.A.14 – “In the case of community college transfer students, institutions are not in possession of information regarding residency at the time of high school graduation or its equivalent. USC recommends that this requirement be stricken and that the Commission initiate verification of California residency as noted [for Article IV.A.6].”	See above.
Confirmation of Transfer Entitlement	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	<p>“CSAC should eliminate this requirement for Institutions. CSAC has a long-standing responsibility of awarding new recipients, which include reviewing California state residency requirements. Due to a snafu where it was discovered that non-California residents received Community College Transfer Entitlement Awards, a new state law AB 840 was enacted where CSAC now makes preliminary awards, and selects 10% of the awardees to be verified by colleges.</p> <p>“This new change negatively impacted our students because the Community College Transfer Entitlement awards were placed on Hold by CSAC, and schools received new requirements on October 12, 2006, well after the Fall 2006 semester had begun. Students</p>	<p>See above.</p> <p>These are provisions of 69436 (d)(3)(B).</p>

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			that were selected for verification then had to provide verification of the following items: (1) the student graduated from a California high school or equivalent during or after the 2000-01 academic year; (2) the student was a California resident at the time of high school graduation or equivalent; and (3) for a student who does not satisfy criteria (1) because he or she graduated from a high school outside of California, that such the student did not graduate from a California high school due solely to military orders that required the student or the student's parent to be out of the state at the time of high school graduation. This created a major delay in these students receiving their Cal Grant funds as well as an institutional burden to track and service these students."	
IV B Disbursement Policy	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA	IV.B – Wasn't clear whether these 6 points were supposed to be contained within the disbursement policy or whether they were actions to take during disbursement; unclear.	Understood. Both are applicable.
Disbursement Policy	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA	IV.B.1 – The wording, "proportional in length," is unclear; sounds like the policy is proportional.	Change made. Wording " and is proportional in length " was removed.
Disbursement Policy	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	WRITTEN	IV.B.1.i – "Is this repetitive to A. 10)?"	Yes. Change made
Disbursing after Confirming	Mary Gill, Consultant, State Assembly	SAC/WRIT TEN	IV.B.1.ii – Need more flexibility. Just delete Article IV.B.1.ii; it is covered by other federal	Change made. Returned wording to mirror original intent of providing Books and Supplies and Access

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Attendance	Higher Education Committee		<p>requirements.</p> <p>“As the institutions stated, they do not verify attendance, they verify enrollment.”</p> <p>“Many students are not yet in a ‘complete’ status...there may be required documents outstanding. The institution cannot make illegal payments.”</p> <p>“We heard at the hearing this might have been added by staff due to some concern that students were taking money and then leaving school...I don’t see how this would be a fix, even if true. That situation is covered in federal refund and repayment rules.”</p>	<p>funds to students as soon as possible. Changed to, “Disburse <i>Books and Supplies and Access</i> funds within ten (10) business days of <i>determination of enrollment</i> status.”</p> <p>The intent of Books and Supplies and Access funds is to allow the students to purchase needed books, supplies, and other direct student expenses that are necessary for class attendance. To delay these funds would be detrimental to the students’ academic success.</p>
Disbursing after Confirming Attendance	Kristen Shear, Santa Rosa Junior College, and CCCSFAAA President Elect	SAC	IV.B.1.ii – Does this mean we verify enrollment and pay within 10 days? Does this mean the school knows the student is attending ½ time or more? The student’s file is not complete at the beginning of the term. September 8 is when CCCs send in enrollment files. All students do not meet this 10 day requirement. What is the intent? Request that CSAC clean up the wording.	See above.
Disbursing after Confirming Attendance	Marisela Arce, Ed.D., Dean, FA, EOPS, TRIO, CAL-SOAP, Yuba College	WEB	IV.B.1.ii – When does the 10 days begin?	The ten days begins upon determination of enrollment status.
Disbursing after Confirming Attendance	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSFAAA President	WEB	IV.B.1.ii – I think you should reword this. We verify enrollment all the time.	See above.
Disbursing after Confirming Attendance	Lourdes Oropeza, Cal Grant Coordinator, Fullerton	WEB	IV.B.1.ii – What would happen to those colleges that confirm enrollment once a month, at the beginning of the month, but the checks are not	See above.

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	College		cut until the end of the month? They would be out of compliance, because it would be past the 10 days.	
Disbursing after Confirming Attendance	Nancy Davis, Financial Aid Director, San Bernardino Valley College; regional representative for CCC Chancellor's Office and CCCSFAAA	WEB	IV.B.1.ii - Suggested clarification: the attendance or enrollment status will be verified and then the delivery of funds should be within 10 days.	See above.
Disbursing after Confirming Attendance	Catherine Graham, Director of Financial Aid, Loyola Marymount; CASFAA Executive Council and Independent Representative	WEB	IV.B.1.ii - Prefer the use of the word "enrollment" to "attendance."	Change made.
Disbursing after Confirming Attendance	Alice Kwong, Financial Aid Supervisor, Consumnes River College	SAC	IV.B.1.ii - We are a multi-campus district; the checks aren't generated on our campus, but through the district office, and they cut according to their schedule. It is usually two weeks.	See above.
Disbursing after Confirming Attendance	Meredith Kelley, Director, Financial Aid and Scholarships, CSU Chico, CASFAA President Elect	SAC	IV.B.1.ii – Attendance vs. enrollment; we need to clarify that CCCs don't take attendance. ("Neither do proprietary" – unidentified speaker)	See above.
Disbursing after Confirming Attendance	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	IV.B.1.ii – "CSAC should eliminate this requirement for Institutions. CSAC currently advances to Institutions 95% of the previous Fall term's reconciled payments. With the rising number of Cal Grant students every year, Institutions do not receive enough Cal Grant funds to be able to disburse all Cal Grant funds to every eligible student until Institutions receive the funds from the State. This requirement	See wording change above.

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			would mean Institutions would have to begin disbursing Cal Grant funds 10 days after the term has started, and would have to find funds to make all Cal Grant disbursements in advance of the funds from the State. In addition, any interest lost in advancing funds to students would not be recovered through the requirements in calculating and returning interest on Cal Grant funds.”	
Late Disbursements	Brad Hardison, Financial Aid Office Director, Santa Barbara City College	WRITTEN	IV.B.1.iv – “This language does not seem to account for the fact that schools may be doing late disbursements of Fall Cal Grants later than 60 days after the term. The wording in this section needs to reflect that.”	See Article IV.C.2.ii for provision for adjustments and late payments.
Overawards	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	IV.B.1.v – Suggested wording, “Correct any overawards <i>as determined under federal regulations</i> , by adjusting other need-based financial assistance, reallocating non need-based financial assistance, offsetting subsequent term payments, <i>need-based and non need-based financial assistance as required under federal regulations</i> or by reducing subsequent term payments <i>or, if necessary, returning the remaining overage to the Commission.</i> ” “I took a stab at a better paragraph, but this section (and the subsequent sections IV,B,2), I and ii,) should be amended to either reflect CSAC guidance in the Cal Grant manual, or to just contain a reference to federal regulations and the manual...these sections seem confusing and a bit incomplete.”	Federal regulations provide for an overaward tolerance. Currently, Cal Grant has no such tolerance for overawards approved by the State or Commission. Change made. Wording changed to, “Correct any overawards by adjusting other financial assistance, <i>excluding tuition waivers</i> , offsetting subsequent term payments <i>within the same award year</i> , or, <i>if necessary</i> , returning the overage to the Commission.”
Disbursement Deadline	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising	LA	IV.B.1.vi – This makes the last day for disbursements (December 31) the same as the final reconciliation deadline (December 31). Can they be the same?	This is conceivable given technological capability.

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Refund Policy	(FIDM) Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	IV.B.2 – Refund policy unclear; look at federal regulations. Need more detail and work with GAC. IV.B.2.ii – Limit to private institutions, not public.	Change made. Added wording, “ <i>which adheres to Return to Title IV criteria and</i> ”
Refund Policy	Carol, Financial Aid Supervisor, Folsom Lake College	WEB	IV.B.2 – We request clarification about the repayment policy in place.	See above.
Refund Policy	Greg Leis, ITT Educational Services, Inc.	WRITTEN	IV.B.2 – “What does this mean?”	See above.
Final Reconciliation	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSFAAA President	WEB	IV.B.3.ii – Wants to make sure the GAC recommendation for the final reconciliation deadline of December 31 is followed.	CSAC supports this idea and will recommend December 31 following the award year to the Commission as the final reconciliation date.
Final Reconciliation	Kristen Shear, Santa Rosa Junior College, and CCCSFAAA President Elect	SAC	IV.C.3.iv – Oftentimes schools reconcile by the end of June and want to return funds then. I encourage CSAC not to require us to wait until October or December. It took us three weeks last year to get our 30 day notice, and our business office had already sent the money. There is a cost to these accounts, and keeping these funds sitting there when we would like to return them involves a cost. There should be a mechanism to return funds earlier.	Change made. Wording changed to, “iv. Upon final award year reconciliation by the Institution, the Institution <i>may, at any time prior to invoicing</i> , repay any Cal Grant funds in excess of the reconciled amount to the Commission. v. Upon final reconciliation by the Commission, <i>if the Institution has any outstanding balances</i> , the Institution shall be invoiced for <i>those funds...</i> ”
Final Reconciliation	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSFAAA President	WEB	IV.C.3.iv – Do institutions need to wait for invoices to return funds or can they automatically do that if they have already reconciled? Can staff please reword this section to state that the schools can do either?	See above.
Final Reconciliation	Mary Gill, Consultant, State Assembly Higher Education Committee	WRITTEN	IV.C.3.iv – “The IPA makes reference to excess funds being returned to CSAC but does not allow for the possibility of deficit funding being requested from CSAC if the reconciliation	During any month prior to the final CSAC reconciliation, the Institution can report payments to request additional funding. After final reconciliation, payments and adjustments can be made on a case-

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			indicates Cal Grant monies are still due to the institution.”	by-case basis. Given the new 60-day term reconciliation, these cases should be rare.
Final Reconciliation	Greg Leis, ITT Educational Services, Inc.	WRITTEN	IV.C.3.v – “This creates opportunity for False Claims Act Liability.”	
Due Process	Mary Gill, Consultant, State Assembly Higher Education Committee	WRITTEN	IV.C.3.viii – “This reference to institutional obligation to pay any liability determined as a result of a program review should have some statement related to due process provided in these matters (appeal, etc).	See below.
Due Process	Tenia Summerville, grants Coordinator, University of LaVerne	WEB	Page 9 – Suggested wording, “...funds that the Institution is ineligible to retain <i>after any and all appeals are exhausted or settled</i> may constitute noncompliance...”	Change made. Added the wording “..., <i>after all appeals are exhausted or settled...</i> ”
Due Process	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	IV.C.3.viii – “CSAC should include a due process for Institutions to appeal and have a fair hearing before an Administrative Law Judge.”	See above.
V Commission Responsibilities	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	V – Slim. Needs a little more flesh on the bones. CSAC has the major overall responsibility to develop forms, timely notices, Transfer Entitlements not getting enough timely notice ... (statement about extending IPA given timeline) work with advisory groups, do work with high schools, acquiring GPAs and verifying. Maybe someday need to have IPA with the high schools.	Change made. Some of the suggestions offered are not applicable to a contract between CSAC and colleges, but added the wording, “ <i>Maintain the Grant Delivery System</i> ” and “ <i>Maintain WebGrants and WebGrants for Students,</i> ” both of which are broad, encompassing duties. Also added, “ <i>Make a preliminary determination that Community College Transfer Entitlement Award recipients are residents of California at the time of high school graduation or its equivalent through use of a student self-certification under penalty of perjury [CEC 69436 (d)(3)(A)].</i> ” and “ <i>Develop forms, publications, and training curriculum for use in administering the Cal Grant Program.</i> ”
VI Information Security	Tony Ross, Vice President for Student Affairs, California State University, Los Angeles	WRITTEN	“There is no mention under Institutional or Commission responsibilities regarding SB 1386 reporting responsibilities should a breach occur. Even though encryption is a requirement throughout this document, the document should spell out who is responsible for notification to	The IPA is a contract between institutions and the Commission. The IPA does not release either party from breach reporting requirements under State law (SB 1386, codified in Civil Code 1798.29, 1798.82 and 1798.84), as per the paragraphs immediately under “Information Security – Institutional

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			<p>whom, including specific contact name and number. If someone downloads the data on to a flash drive and loses it, there's possibly a need for notification."</p> <p>Add "<i>both electronic and printed,</i>"</p>	<p>Responsibilities" and the corresponding "Commission's Responsibilities," respectively. As per language in Article II, the IPA does not supersede any state or federal laws or regulations.</p> <p>Item L contains phone contact information for the ITS Help Desk in the event of a breach. It is possible that the Commission's ISO's contact information will also be added to this section.</p>
Information Security	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA/WRITTEN	VI.A – "Maintain a historical record" – I don't understand. I'm the System Administrator, so I know who has signed and been given access. "We can provide a list of users who have been given access to WebGrants (the list is actually on WebGrants), but we have no way of identifying who access the site. Does WebGrants 'stamp' transactions with the User ID?"	See wording change below.
Information Security	Rivka Weinberg, Director of Student Services, Touro College, LA	LA	VI.A – Perhaps it should read, "the identification of the individual(s) who <i>are granted access to...</i> "	Change made. Suggested wording added.
Information Security	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	WRITTEN	VI.B – "The underscore between the words "Authorized" and "Official" should be removed."	Change made.
IS Training	Cecilia Kwan, Los Angeles Trade Tech College	LA	VI.G – Who will provide the training? Institutions are not experts; it would be better if CSAC provided training. Web training is the best, because it is convenient –or in-person training with a Web alternative. Access renewal starting from August 1 of which year? For 2007-08 can existing accounts be used? July 1 st works better, because it begins the academic year.	<p>CSAC will provide the training online to download.</p> <p>Access renewal will occur on August 1 of each year. The first annual renewal will begin August 1, 2007. Notices will be sent 30 days prior, 14 days prior, and three days prior to expiration. Renewals may be made as soon as notification begins.</p>
IS Training	Tony Ross, Vice President for Student Affairs, California	WRITTEN	"There is no indication that employees or agents must sign the "Information Security and Confidentiality Agreement" mentioned in D	The Information Security and Confidentiality Agreement is a separate document from the Grant Delivery System (GDS) WebGrants User Access

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	State University, Los Angeles		<p>above. They should be aware of the same requirements as the Authorized Official and the System Administrator.</p> <p>“Should all Institution employees or agents who are authorized to have GDS access be required to submit an accurate and complete "Information Security and Confidentiality Agreement" form to the Commission before access to the Commission’s network and data is granted? Does the “...User Access Request Form” already includes the necessary assurances?</p> <p>“Who will be responsible for 1) identifying the required training content, 2) making training available and 3) maintaining documentation of training?”</p>	<p>Request Form. The former is geared towards System Administrators (SA) and Authorized Officials (AO) and contains instructions regarding access and duties, similar in scope to the IPA. The latter document makes a reference to acknowledging having received and reviewed all security and confidentiality policies pertaining to the use of WebGrants.</p> <p>These two documents are quite different.</p> <p>CSAC will provide training that should augment the training that must be in place at the respective institutions. This training will be located in WebGrants for SAs to download for training purposes.</p>
IS Training	Brad Hardison, Financial Aid Office Director, Santa Barbara City College	WRITTEN	VI.G – “Limiting user to one year seems in practicable and not consistent with logins maintained by the US Department of Education. The annual training required is not specified as well. I believe CSAC should develop a training (online) that staff can participate in to meet this requirement. Otherwise, I feel that this requirement would be too burdensome.”	See above.
IS Training	Chris Jennings, Director of Financial Aid, Fashion Institute of Design and Merchandising (FIDM)	LA/WRITTEN	<p>VI.G – How is training handled with respect to granting or losing access? If they don’t receive training, do they lose access? How will CSAC know? Whatever training you can provide will be very much appreciated. If the training is on-line then that could be the certification that training has occurred.</p> <p>“Limiting access to a period of 1 year seems extreme.” Is there any logic in tying the access date to a hard calendar date as opposed to their original WebGrants access date? Do you have</p>	<p>See above.</p> <p>When renewing accounts, SAs should ensure that the employees receive and understand this training, prior to granting or renewing access to WebGrants. Since SAs are the account-granting authority for employees, the SAs will be the responsible party for checking off assurance that they have received this training.</p> <p>The one year date is expected to limit access of records by an employee from one academic year to</p>

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			<p>a way, based on the user ID, to determine what the user is doing on WebGrants? Can you track what a particular ID is doing?</p>	<p>another academic year, in the event the employee is no longer performing financial aid-related work for that institution or no longer employed by that institution.</p> <p>CSAC's audits have found that numerous accounts existed with expirations extending over a decade. Additionally, compliance reviews have reported high turnover at financial aid offices while WebGrants accounts continue to remain active.</p> <p>CSAC is expected by law to exercise due diligence in limiting access to student/institution information, and the one year length of time, expiring during the summer was the best compromise staff could achieve to accommodate institutions' academic schedules and CSAC's processing cycles.</p> <p>The CSAC ISO has requested an enhancement to WebGrants for tracking transactions on a per-user basis, with CSAC staff researching this capability at this time.</p>
IS Training	Chris Collins, Associate Director, Office of Financial Aid and Scholarships, San Diego State University	WRITTEN	<p>Article VI.G – “We recommend that the Commission develop the standardized training programs needed in the areas of information security, privacy and confidentiality. These programs could be conducted through computer based training modules or in person as a part of CSAC's annual, regional training workshops. If the training is developed and conducted by CSAC, the content can address in a specific way the concerns of the Commission regarding these issues. To leave the training to the discretion of institutions creates the possibility that key issues will not be included or uniformly dealt with in a way that is acceptable to CSAC.”</p>	See above.
Passwords	David Meske, CISSP, Director, Information	WRITTEN	<p>VI.H - How is the Commission defining regular basis? Is there a Commission standard?</p>	Currently, it is defined as every 90 days. It is defined in WebGrants software and is already in

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	Security & Compliance, Loyola Marymount University			effect. See below.
Passwords	Tony Ross, Vice President for Student Affairs, California State University, Los Angeles	WRITTEN	VI.H – “Passwords will be changed on a regular basis.... ’ Suggest adding: <i>every 90 days.</i> ” “Suggest Adding: <i>1. Confidential Commission data may not be copied to Laptop computers, CDs, DVDs, flash drives, or any other form of electronic media and removed from the Institution’s premises.”</i>	The regularity of password renewals may change prior to the expiration of this document due to future developments of real-time access to data and database queries. Therefore staff hesitates to document a firm time period. Any changes made to the password renewal process will be widely distributed long before any such changes are implemented. The proposed wording that is being recommended is a good policy to implement; however, some schools have stated that they have employees who work from home, and Section K should accommodate these special circumstances.
Passwords	Catherine Graham, Director of Financial Aid, Loyola Marymount; CASFAA Executive Council and Independent Representative	WEB	VI.H and J – Aren’t we already monitoring password updates, etc.? It’s not an institution’s sole responsibility to ensure security of the password; it should be a CSAC responsibility, too. Also, concerning the acceptable use policy, can the institutions just include CSAC policy and requirements in their own established policy?	Change made. CSAC supports this idea. Requiring regular password changes has been added to the Commission’s Responsibilities section.
Destruction of Data	Scott Thomason, Vice President, Business Officer, Redwoods Community College District	WRITTEN	VI.H – “On page 11 where it addresses needing to return or destroy data. It should say “all data obtained from the commission shall be kept confidential and, when no longer needed, destroyed in a secure manner following the institutions’ normal security policies for handling confidential data.”	As per the paragraph at the beginning of Article VI, all classes of data that fall under NPI (Non-public Personal Information), PII (Personally Identifiable Information) and personal financial information are deemed to be Classified for the purpose of this agreement. The proposed wording does not satisfy all requirements of law pertaining to derivations of data. Additionally, the law requires that the Commission stipulate the level of security for data

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				disposition, as owners of the data. Leaving it for individual institutions to adopt adequate policies places the Commission in a position of weakness, should a breach occur at an institution without sufficiently stringent data destruction policies in place. The "Disposal Rule" (FTC 16 CFR 682, Fair and Accurate Credit Transaction Act of 2003 (FACTA)) goes into great detail about the disposal of financial records, including records involving "failed transactions," which are not addressed under the GLBA (Gramm-Leach-Bliley Act).
Acceptable Use Policy	Scott Thomason, Vice President, Business Officer, Redwoods Community College District	WRITTEN	VI.J – "We already have acceptable use policies for confidential data. Why would we need to set up a separate, special training and policy program just for commission data as opposed to all other confidential student data?"	Change made. CSAC supports this idea. The proposed wording is being changed from "...privacy and confidentiality of Commission data" to "privacy and confidentiality to include Commission data". I believe this will address the concern over the effort to create a "Commission only" policy.
Acceptable Use Policy	JoAnn Bernard Financial Aid Director, Miracosta Community College	WEB	VI.J –If a school has a written policy by AIS, does that suffice if they follow that?	CSAC has a legal responsibility to require standards for protection of its data. CSAC cannot rely on non-Commission policies to determine data protection standards.
Encrypting	Scott Thomason, Vice President, Business Officer, Redwoods Community College District	WRITTEN	VI.K – "Should say that accessing the Commission's physical network or protected web site should not be done from home or from public computers or hotel room networks instead of referencing "encrypted hard drives" and the no "bridging capability" references."	Section K allows for flexibility by some institutions who have stated that they have work being conducted off-site by employees. Due to respective institution needs, we simply state that the data should be encrypted at offsite locations, and that encrypted sessions should be the only means by which one should be connected to any Commission networks from offsite. The bridging component is an essential security practice in the event that the Commission provides any additional (non-web) access to the Commission's networks and data in the future. As it stands today, any web-based access to the Commission's WebGrants program is conducted via a secure session, as evidenced by the "https://"

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IS Incident Notification	Gilda Maldonado, Financial Aid Director, San Diego Mesa College	WEB	VI.L – Can we please clarify the wording, so it states, “...ten (10) business days <i>after the institutions’ awareness of the incident.</i> ”	prefix in the web browser. Change made. Suggested wording added.
IS Incident Notification	Tony Ross, Vice President for Student Affairs, California State University, Los Angeles	WRITTEN	VI.L – “Suggest the following format: L. The Institution will notify the Commission immediately of any security, integrity or confidentiality incident(s) involving Commission data or network exposure by contacting the Commission’s ITS Help Desk at 888-294-0148. Such incidents may include, but are not limited to: <ul style="list-style-type: none"> • unauthorized or accidental modification, destruction, disclosure, loss, or access to automated files and databases; • incidents involving loss, damage or misuse of information assets; intrusions or breaches to Institution computers used to access the Commission data.” 	Change made. This suggestion will be implemented to help clarify the requirements necessary for contacting the Commission’s ITS Help Desk and Commission’s ISO as a result of an incident involving Commission data.
Third Parties	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	VI.M – I’m concerned about the statement that no Commission data can be transferred to a third party. What about district-level authorization; the whole MIS (Management Information System) is driven at a district level.	On a legal basis, each institution’s executive director signs the agreement for the handling of Commission data, and the agreement is with each institution. Instances requiring a district-level data storage and processing capability should contact the Commission’s ISO with a copy of the agreement between the institution and the district which reflects the same or better safeguards for the handling and protection of Commission data, and places appropriate legal requirements for reporting unauthorized access, modification, etc. of Commission data to the Commission and Institution, as the IPA requires a letter containing details of the incident signed by the Institution’s executive officer to be sent to the Commission’s ISO (Item L).
Liability	Scott Thomason, Vice President,	WRITTEN	VI.N – “If the intent is that the institution will accept liability for direct or consequential	Staff feels the current wording states this intent.

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	Business Officer, Redwoods Community College District		damages caused (by negligence, etc.) to the Commission's network or data integrity, then that is what should be said."	
Liability	Steven B. Sample, President, University of Southern California	WRITTEN	VI.N – [Section N] "should be stricken."	See above.
Confidential Data	Scott Thomason, Vice President, Business Officer, Redwoods Community College District	WRITTEN	VI.Q – "Seems to reiterate what is said in Paragraph P as well as in Paragraph E in the final section on page 12."	An initial draft had letter Q only, but enough confusion was generated that it resulted in specific references to existing widespread practices of email and faxing of confidential information. The differences between the sections involve Institution responsibilities and Commission responsibilities, respectively.
Auditing Security Records	Steven B. Sample, President, University of Southern California	WRITTEN	VI.G – Commission's Responsibilities – "This provision, which permits the Commission to audit the Institution's security records, should be modified as follows: 'The Commission will periodically audit, during normal business hours and upon reasonable advance written notice of no less than fifteen (15) business days, the security related records...'"	Changed wording to, "The Commission, <i>as part of their compliance review</i> , will audit the security-related records..." This will be subject to compliance review requirements stated elsewhere in the IPA.
Remedies	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	VII – The remedies are all institutional; how do those protect the students? In the Compton bankruptcy, no Cal Grant funds were stopped to students. There is no law cited here, the FSA Handbook tells you.	The severe instances where serious remedies must be taken against a school, do involve potential harm to the interests of the students and the State of California. Each student has the right to transfer to another institution to utilize his/her Cal Grant.
Remedies	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSFAAA President	WEB	Concerning the remedies for non-compliance (and 30, 60, 90, 120-day invoices and penalty letters), will you please clarify what the penalties will be at each timeframe? Maybe include a timeline to show the progression of increasing intensity for each penalty?	Unfortunately, the scope of the Corrective Measures is broader than the penalty letters, and to include them would restrict the policy.
Remedies	Steven B. Sample, President, University	WRITTEN	VII – "As currently drafted, the Commission is required to give 30 days notice before it may	Change made. Suggested wording added.

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	of Southern California		impose the enumerated remedies for failing to comply with the terms of the Agreement. USC recommends that, during that time period, the Institution be permitted to provide a response and/or evidence related to such remedies. To that end, USC recommends that the following language be included: 'Institution shall be permitted to submit, and the Commission shall consider, a response to such notice, including any legal and factual reasons why such remedy should not be imposed. Such response shall be submitted within fifteen (15) days of receipt of the Commission's written notice of its intent to impose such remedy.'"	
VIII Agreement Duration, Due Process	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC/WRIT TEN	VIII.B.2 – Where is the necessity of comments to due process? Acknowledge that due process exists within the agreement, and show that institutions have access to it. "CSAC lists appropriate remedies for failure to comply (such as withholding Cal Grant funds from the institution). Cal Grant is a student entitlement; what recourse does a student have should CSAC cut off funding? In the CCCs, in particular, no monies go to the institution (not one penny ever has...) so how does this remedy apply to the institution?"	Change made. Added the following wording to Article VIII. <i>"The Institution shall be permitted to submit, and the Commission shall consider, a response to such notice, including any legal and factual reasons why such termination should not occur. Such response shall be submitted within fifteen (15) days of receipt of Commission's written notice of termination."</i>
Agreement Duration, Due Process	Catherine Graham, Director of Financial Aid, Loyola Marymount; CASFAA Executive Council and Independent Representative	WEB	VIII - Is there an option for an appeal process for audit?	See above.
Agreement Duration	Beth Asmus, Dean, Special Programs, College of the Canyons,	WEB	Can CSAC delineate the options for the IPA being rolled out (i.e., roll out sections at different times, roll out the whole document at a later date, etc.)?	Items in the new IPA requiring grace periods for implementation have sections included which are entitled, "Phased Implementation."

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	CCCSFAAA President			
Agreement Duration	Gilda Maldonado, Financial Aid Director, San Diego Mesa College	WEB	Shouldn't we include the verbiage from the beginning of the IPA (Article I.A or Article II.G?) which mentions that the details of these articles may be null and void based on changes by the state legislature, etc.?	Change made. Added the wording, "The Agreement automatically terminates with any of the following occurrences:... <i>The fiscal year's budget adopted by the Legislature and signed by the Governor fails to approve Cal Grant funding.</i> "
IX Certification	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC/WRIT TEN	<p>Has anyone addressed the fact that BPPVE (Bureau for Private Postsecondary and Vocational Education) will cease to exist by July 1st? This needs to have language about other authority.</p> <p>Again, Article IX, p. 16 should say, "...not less than ten (10) percent..."</p> <p>"Again, a note about CCC organization; many colleges will have a college CEO and a district Chancellor. Which should sign if both have responsibility for items in the IPA?"</p>	<p>CSAC is considering this occurrence. However, the current IPA does not contain language concerning BPPVE authorization, and the proposed IPA will not either.</p> <p>Change made. To be consistent with Article II.A.2, added the wording, "...[at least] ten (10) percent..."</p> <p>The college CEO will sign the IPA.</p>
Certification	Nancy Davis, Financial Aid Director, San Bernardino Valley College; regional representative for CCC Chancellor's Office and CCCSFAAA	WEB	Concerning certification, couldn't we have a form or statement to sign off that states the institution is complying with other IT certification rules (eg. Gramm-Leach-Bliley Act)?	Unfortunately, the laws defining Information Security are too numerous to be listed here.
Appendix A, Definitions	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	<p>Definitions going out with the IPA have sub-regulatory weight. I would be concerned if they were not given equal consideration.</p> <p>"Advances" – In mid-August? Classes have started by then; how about 10 days after the budget is signed?</p> <p>"Independent" and "Proprietary" – need clearer</p>	<p>Appendix A has been a part of the draft IPA through GAC discussions and the public comment period. It has and will continue to receive the same level of scrutiny as the remainder of the document.</p> <p>It is true that some students may have begun classes by the time of the Fall Advance, but this date was chosen to match the majority of school schedules and is only temporarily in place pending</p>

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			language. There is a difference, these are overlapping definitions.	implementation of the Real-time Funding Model.
Definitions	Kristen Shear, Santa Rosa Junior College, and CCCSFAAA President Elect	SAC	“Access” –Refers only to Cal Grant B; perhaps should be “Access Grant” Don’t define “Entitlement.”	Access is a portion of the Cal B Grant. Further definition for “Entitlement” and “Competitive” can be found in the CGPM.
Definitions	Rivka Weinberg, Director of Student Services, Touro College, LA	LA	“Award Year” versus “Academic Year” – Why does it begin in July? What about the summer term? Is there a difference between the two definitions?	
High School Graduation Confirmation (not yet in the IPA)	Gail Modder, Program Manager, Admissions and Records, Sierra College	SAC	At the community colleges, no transcripts are required. We have a transient population. Open access. HS graduation is challenging for the community colleges due to CAHSEE. This would be very burdensome. The community colleges are the least funded public institution. We enroll 20,000 students, one-third are financial aid students. Work-wise we would have to add at least one full-time employee to collect that from each student. Multiply that times 109 community colleges.	See the <i>High School Graduation Confirmation</i> issue paper on the Commission’s website.
High School Graduation Confirmation	Marisela Arce, Ed.D., Dean, FA, EOPS, TRIO, CAL-SOAP, Yuba College	SAC/WEB	The financial aid officer continues to get additional responsibilities, both federal and state. We have restrictions about how much staff can be hired. Additional workload without additional personnel results in errors. Let the high schools certify who graduates. They are in the best place to do so. Have a link or Web-based solution to draw down the information of the student. Utilize the database CSAC already has with them.	See the <i>High School Graduation Confirmation</i> issue paper on the Commission’s website.
High School Graduation Confirmation	Meredith Kelley, Director, Financial Aid and Scholarships, CSU Chico, CASFAA President Elect	SAC	(Concerning the G8) May the form specify which institutions need the form and which don’t need it to be submitted? Will the AG’s (Attorney General’s) office have the final say?	See the <i>High School Graduation Confirmation</i> issue paper on the Commission’s website.
High School	Jacqueline Bradley,	WRITTEN	“One solution for high school graduation	See the <i>High School Graduation Confirmation</i> issue

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Graduation Confirmation	Assistant Dean, Financial Aid and EOPS, Mendocino College		<p>verification may be: Since CSAC already collects GPA verifications in a centralized format, perhaps their computer programming staff could look at adding a Y/N element in the electronic submission and on the paper GPA submission form, which answers the question "Has this student passed the California High School Exit Exam?" If the answer is no, CSAC would mail them a form which asked the student to have their high school verify their high school graduation. Colleges and universities would verify as they do now, when there is conflict of information."</p> <p>"The various segments of California higher education have very different verification processes and awarding calendars. Community colleges are mandated to allow open access and to continue to process and award financial aid throughout the year. Community colleges begin the financial aid outreach process at least a full semester before the next Federal Application for Student Financial Aid is made available. The timelines, established processes and current resources must be taken into account when considering any shift in responsibilities to the colleges. Stakeholders should meet with CSAC staff and administrators to develop a solution that is not overly cumbersome and burdensome for any group."</p>	paper on the Commission's website.
High School Graduation Confirmation	Cindy Castillo, Director of Financial Aid and Scholarships, De Anza College	WRITTEN	"We believe that the self-certification from the student stating graduation from high school should be sufficient since we can verify that with the institution's Admissions status. Conversely, if a student indicates he/she did not graduate from high school, we believe the federal Ability-to-Benefit testing should be sufficient to meet	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.

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High School Graduation Confirmation	Chris Cortes, Director of Financial Aid, Reedley College	WRITTEN	<p>the criteria for eligibility so that both federal and state programs treat the student equitably.”</p> <p>“Regarding verification of high school graduation, the aid offices should not be required to collect high school transcripts. We could obtain self-certification of a student's high school graduation status, but it would still be collected prior to the student's actual graduation date.</p> <p>“To require us to obtain proof of a student's HS graduation not only require students to jump through another hurdle, but would delay the processing of awards to first-time freshman. At many colleges, a first-time college student that is a recent HS grad can be processed early because there are no SAP issues from prior college work to review. This would further bottleneck the chaotic summer processing of aid for many new students.</p> <p>“I agree that CSAC should highlight the importance of the student's responsibility in only accepting funds for which they are eligible. If students do not graduate from high school or do not pass the CAHSEE, it needs to be very clear what students need to do if they fall into this category. The schools can assist with this and if necessary, collect documentation to resolve any discrepancies.”</p>	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.
High School Graduation Confirmation	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	What is going on in the last year represents a sea change. Statute says CSAC is responsible for awarding; CSAC is starting to give responsibility to the colleges. The best idea is a database from the high schools. Go to O'Connell (Superintendent of Public Instruction)	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.

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			<p>to establish a database. It's the high school's responsibility to confirm graduation as they have the information. CSAC has been loath to require of the high schools what they require of the community colleges. Of the new \$37 million addition to the community college budget, 25% will be eaten up with the requirement to gather high school transcripts.</p> <p>In my experience, the AG's office knows very little about Cal Grants. I urge you to proactively work with the AG, so they understand background. I have seen the AG use faulty understanding of statute and the heritage of the Cal Grant Program.</p>	
High School Graduation Confirmation	Beth Asmus, Dean, Special Programs, College of the Canyons, CCCSFAAA President	WEB	Having gone to all the Commission meetings for the last year,...as of February's meeting, legal counsel still hasn't come back with some information—residency, high school graduation, punitive actions for non-compliance—and we are confused. It is not an unwillingness to work with you, just confusion. For example, CSAC did a study and there was no empirical data to support that there was a single student who used a Cal Grant who was not a high school graduate.	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.
High School Graduation Confirmation	Kristen Shear, Santa Rosa Junior College, and CCCSFAAA President Elect	SAC	<p>What are we waiting for from the AG, and when will it be expected? I am concerned that there will not be enough time after the AG decides, before the Commission meeting.</p> <p>As President-elect of CCCSFAAA I am concerned; our students do not need completion of high school to enroll due to open access – this is a mixed-message. Some community colleges may opt to collect high school transcripts, but it will delay delivery. Our students are already disadvantaged. That's</p>	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.

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			<p>why they are attending community college, so there will be many of those students further disadvantaged.</p> <p>As a financial aid officer, I am concerned that the G8 will be semi-confrontational. Many students cannot return to their high school. Have the forms been developed? Is there time to change? When will they be mailed out?</p>	
High School Graduation Confirmation	Sophia Toney, Manager, Financial Aid, City College of San Francisco	SAC	We have no way to collect high school transcripts. Students will experience delays. Cal Grant will not be delivered at the same time as Pell, SEOG, etc. The community colleges developed a form for the ACG which Marianna Deeken (U.S. Department of Education) says is fine. It says the student graduated on XX date; why do you need more? You just need to know if the student graduated. Fifty percent of our students receiving financial aid didn't graduate from high school in the USA; it will take half a year to verify them.	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.
High School Graduation Confirmation	Gilda Maldonado, Financial Aid Director, San Diego Mesa College	WEB	When we were evaluating GAC's recommendations and comparing them to the draft IPA, we wonder why there is even a consideration if this group has already identified that high school students are correctly representing their graduation. I concur with GAC's recommendation on high school graduation on page 5.	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.
High School Graduation Confirmation	Alice Kwong, Financial Aid Supervisor, Consumnes River College	SAC	High schools are already reporting their GPAs electronically; couldn't they just submit additional information after graduation about GPAs they submitted, who graduated and who didn't? We don't know how long it will take in the fall to request high school transcripts. It's hard to proceed since high schools are closed during the summer. We are bombarded in the fall. That traffic, coupled with the many late	See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.

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			<p>appliers in the fall is very difficult. The workload is horrendous. Students suffering two months into the term without money because financial aid is not issued. Even if I could hire more staff, I don't have the space. This is our first year for imaging processing. The paper alone is horrendous.</p>	
High School Graduation Confirmation	Eugenia, Riverside College	WEB	<p>At our institution, we determined that particular information would only be captured in one office, so there was no potential for conflicting information found between two different offices of the campus, an audit finding. High school graduation documentation is collected by Admissions and Records; if the information is placed in the Financial Aid Office, I'm not sure whose would supersede.</p>	<p>See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.</p>
High School Graduation Confirmation	Carol, Financial Aid Supervisor, Folsom Lake College	WEB	<p>How come the high schools cannot send a roster of graduates to CSAC in June? I don't know about the other schools, but a lot of changes in the middle of the year is difficult. If we can't iron it out, we would support extension.</p>	<p>See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.</p>
High School Graduation Confirmation, Law	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	<p>The high school graduation solution is much broader. Sometimes the law is the problem, and CSAC has a responsibility to work with legislators and DOF (Department of Finance) on quality and administration, educate the governor's office, and seek legislative options. You have lots of vehicles to change the law. The Ortiz Bill ran into problems; I urge you to continue looking into this.</p>	<p>See the <i>High School Graduation Confirmation</i> issue paper on the Commission's website.</p>
Extending IPA	Craig Yamamoto, Director of Financial Aid, CSU Sacramento	SAC/ WRITTEN	<p>California State University, Sacramento endorses the Grant Advisory Committee (GAC) recommendations as detailed in the February 2007 GAC Chair's Report. We urge the California Student Aid Commission (CSAC) to extend the current IPA until a serious discussion can be devoted both to the overall model of Cal Grant delivery as well as the specific issues in</p>	<p>See the <i>Extension and Grace Periods</i> issue paper on the Commission's website.</p>

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			<p>the draft IPA. There are unresolved issues between the financial aid community and CSAC staff in the interpretation and implementation of responsibilities in the current program.</p> <p>“The reason we believe this is the best approach is after months of working on the draft IPA, there are several serious unresolved issues which create a resource issue for the University and will harm students by delaying their Cal Grant payments if implemented. The issues regarding High School graduation and California residency are still unresolved. We recommend CSAC be prudent and careful in the IPA approval process and listen to the concerns raised by institutions.”</p>	
Extending IPA	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	<p>How much is implemented and how long? Until resources are available? Until policy is debated? How will it be phased-in? The outcome and results are what is important.</p> <p>I support that CSAC extend the current IPA to consider GAC’s recommendation of another system, should the schools have to take on much more responsibility than they already have for the Cal Grant Program.</p>	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Sophia Toney, Manager, Financial Aid, City College of San Francisco	SAC	Phase-in? I do not agree. CA residency, interest-bearing accounts, verification...phase-in says we sign even though we don’t agree with it. Implement new law or CSAC take more responsibility. Work it out first, and then work on a new comment period.	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Jacqueline Bradley, Assistant Dean, Financial Aid and EOPS, Mendocino College	WRITTEN	“I concur with the Grant Advisory Committee’s recommendation that the existing IPA be extended pending a full review of the delivery process that evaluates feasibility, cost-effectiveness, and efficiency of the various options. The review should be completed with	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.

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			input from all stakeholder groups, much as the federal government handles the negotiated-rule making process. From my reading of the expectations regarding institutional responsibility for determining high school graduation, the IPA remains unclear.”	
Extending IPA	Kristen Shear, Santa Rosa Junior College, and CCCSFAAA President Elect	SAC	Cal B is called the “Access Grant.” These are “Entitlement” awards. Delaying awarding is in direct conflict with those terms. I recommend CSAC extend the current IPA and hold students harmless for the 2007-08 academic year.	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Nancy Davis, Financial Aid Director, San Bernardino Valley College; regional representative for CCC Chancellor’s Office and CCCSFAAA	WEB	I believe the process is running on a fast train and needs to be slowed down, We need to do more research—capacity and workload studies.	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Brad Hardison, Financial Aid Office Director, Santa Barbara City College	WRITTEN	“I believe these (commingling, late disbursements, annual training – see comments above) are significant issues and many have been brought up as the IPA has been drafted. If these and other concerns are not worked out to the satisfaction of the schools, I suggest that the current IPA be extended for another year to allow sufficient time for stakeholders to craft this important document. I am concerned about the fast pace this process is taking to implement an agreement by June 30th.”	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Chris Cortes, Director of Financial Aid, Reedley College	WRITTEN	“Regarding implementation of the changes proposed in the IPA, there needs to be a period of time where the Financial Aid Office can update procedures to comply with the new changes. If the signing of new IPA occurs on June 30th, it would be unrealistic to expect aid	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.

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			offices to be able to fully comply with some of the proposed changes such as verifying high school graduation status. The current IPA should be extended another year.”	
Extending IPA	Deborah S. McCracken, Director, Financial Aid California State University, Fullerton	WRITTEN	“It is recommended that sufficient time be allowed for review, design, and finally implementation of all new requirements as set forth in a new IPA document. As a result, extension of the current IPA may be warranted. It is unreasonable to expect a new agreement to be signed for the 2007/08 fiscal year (June 20, 2007) coupled with compliance of all rules as presented in the IPA.”	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Linda Jennings, State Coordinator/Special Grants & Programs, National University	WRITTEN	“For the record National University supports the GAC recommendations presented to the California Student Aid Commission on the IPA revision AND, we support an extension of the current IPA for another year as recommended by both GAC and the California Association of Financial Aid Administrators.”	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Sean Smith, Director of Financial Aid, Scripps College	WRITTEN	“Scripps College supports the GAC recommendations presented to the California Student Aid Commission on the IPA revision. Additionally, Scripps College is in favor of an extension of the current IPA for another year, as recommended by both GAC and the California Association of Student Financial Aid Administrators (CASFAA).”	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Catherine Graham, Director of Financial Aid, Loyola Marymount; CASFAA Executive Council and Independent Representative	WEB	One concern for Financial Aid and Admissions is that we are assuming so much responsibility. We are three months from the deadline; is there going to be leeway for us to get our acts together. One reason that I am recommending a one year extension is that you are asking us to do some testing on a possible option.	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Mindy Bergeron,	WRITTEN	The California Association of Student Financial	See the <i>Extension and Grace Periods</i> issue paper

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IPA Article	Name, School/ Organization	Method of Response	Comment	Response
	CASFAA President		<p>Aid Administrators (CASFAA) encourages the California Student Aid Commission (CSAC) to extend the current Institutional Participation Agreement (IPA) for 2007-08 until such time as serious discussion can be given to the overall model of Cal Grant delivery and details of the draft IPA that continue to be problematic for the financial aid community. This is an endorsement of the position taken by the Grant Advisory Committee (GAC).</p> <p>“The reasons for this position include the following:</p> <ul style="list-style-type: none"> • The current IPA is a hybrid, assigning some responsibilities for determining Cal Grant eligibility to the institution and some to CSAC. Before issuing a final IPA, reasoned consideration should be given to the following: <ul style="list-style-type: none"> - Fully centralizing Cal Grant administration - Fully decentralizing Cal Grant administration; or - Providing additional clarity on roles and responsibilities and providing additional resources where needed. • Outstanding issues exist with the draft IPA that could be addressed through the process of reviewing the overall model of the IPA as outlined above. As outlined in the GAC recommendations, these issues include: <ul style="list-style-type: none"> - Option of commingling of Cal Grant funds in an interest-bearing account - Calculation of interest on Cal Grant funds held by the campus 	<p>on the Commission’s website.</p>

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IPA Article	Name, School/ Organization	Method of Response	Comment	Response
			<ul style="list-style-type: none"> - Campus confirmation of high school graduation - California residency definitions - Campus confirmation of residency” 	
Extending IPA	Denise C. Donn, Director of Financial Veteran Services, San Joaquin Delta College	WRITTEN	I have had the opportunity to review and participate in a number of discussions regarding the changes that are being recommended to the existing Participation Agreement. I support the changes that have been outlined in the letter from the CASFAA president (Mindy Bergeron)...” (See comment above.)	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Scott Thomason, Vice President, Chief Business Officer, Redwoods Community College District	WRITTEN	<p>“We fully support the Grant Advisory Committee’s recommendations and <i>strongly agree</i> that with several unresolved issues the existing IPA should be extended pending a full review of the delivery process. The timeline for implementation of the proposed IPA is very tight, and would seriously challenge our financial aid processing timeline for next year.</p> <p>“As stated above, we favor further work be devoted to the Grant Advisory Committee’s recommendations before any decisions are made final. We also support a fully centralized process that would allow CSAC to take responsibility for final determination of Cal Grant eligibility. We firmly believe that a fully centralized process is in the student’s best interests, as it would allow for a more consistent eligibility determination and be a more equitable process for all students.”</p>	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Extending IPA	Lili Vidal, Interim Director, Financial Aid and Scholarships Department, California State University, Northridge	WRITTEN	“Cal State Northridge agrees completely with the comments that have already been submitted from GAC, CASFAA, and our colleagues at Cal State Sacramento. It would seem prudent to withhold renewing this agreement for an additional year to allow for further negotiations	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.

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IPA Article	Name, School/ Organization	Method of Response	Comment	Response
			and upcoming changes to be put in place that would eliminate the need for interest-bearing accounts.”	
Extending IPA	J. Michael Ortiz, Ph.D., President, California State Polytechnic University, Pomona	WRITTEN	“In consultation with the Director of Financial Aid, the draft IPA has been reviewed along with comments provided by The California Association of Student Financial Aid Administrators and the Grant Advisory Committee. My recommendation at this time would be to support an extension of the current IPA. It is apparent that further discussion needs to take place between the financial aid community and CSAC staff in an effort to put together a model Cal Grant delivery system.”	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Decentralization/Centralization	Beth Asmus, CCCSFAAA President	WRITTEN	<p>“We recognize the responsibility of the Grant Advisory Committee (GAC) to represent <u>all</u> segments of higher education and to advise and make recommendations to the California Student Aid Commission on state grant programs. We have reviewed the Grant Advisory Committee’s recommendations on the draft IPA as reported at the February 2007 Commission meeting. At the March 26, 2007 CCCSFAAA Executive Board meeting, the Board unanimously endorsed supporting the GAC recommendations as made.</p> <p>Many of our members participated in the open forum or web conference or have submitted written comments and suggestions on the draft IPA. We ask you to consider our members’ feedback and concerns associated with the most current draft IPA as supporting GAC’s outlined concerns, and we recommend incorporating GAC’s recommendations to the Commissioners at the April meeting.”</p>	See the <i>Extension and Grace Periods</i> issue paper on the Commission’s website.
Miscellaneous Comments	Sophia Toney, Manager, Financial	SAC	The IPA as a whole is 75% schools’ requirements, 25% CSAC’s requirements. We	The language is intended only for its clarity to expound the institution’s responsibilities in

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	Aid, City College of San Francisco		are all together in this job. The language of the entire document needs to be different, friendlier. "We are going to take the Cal Grant away from you if you cannot do..." is what it sounds like.	administering Cal Grant funds.
Miscellaneous Comments	Cindy Castillo, Director of Financial Aid and Scholarships, De Anza College	WRITTEN	"As a general comment, providing a new version without a summary of the comparison to the previous version and a summary of the changes, it is difficult to respond. It would be more helpful if the Commission would start with the previous version and provide a summary of the stricken sections and a summary of any additional sections so that we can provide more accurate responses to whatever is imbedded into the new draft."	This process has been followed with GAC. The proposed draft IPA has changed so significantly, it was determined that a summary of changes would be too cumbersome to follow.
Decentralization/Centralization	Sean Smith, Director of Financial Aid, Scripps College	WRITTEN	"Scripps College specifically supports the movement to a fully centralized process with additional resources allocated to CSAC to take on responsibility for final determination of Cal Grant eligibility."	See the <i>Consideration of a Decentralized Cal Grant Program</i> issue paper on the Commission's website.
Decentralization/Centralization	Sal Alcalá, Dean Special Services, Financial Aid /EOPS, Solano Community College	WRITTEN	"As a former President of the California Community College Student Financial Aid Administrators Association (CCCSFAAA) and former President of the California Association of Student Financial Aid Administrators (CASFAA), I concur with CASFAA's comment urging you to defer revision to the Agreement in order to allow due consideration of having the Cal Grant program decentralized or perfected as centralized. As one reviews the draft agreement, so much of the document has the administrative burden weighing on the shoulders of the institution. Given this, why not decentralize?"	See the <i>Consideration of a Decentralized Cal Grant Program</i> issue paper on the Commission's website.
Decentralization/Centralization	Mary Gill, Consultant, State Assembly Higher Education Committee	SAC	Entitlement – "the law is to the student, not to the institution." Overall solution is the decentralization of the Cal	See the <i>Consideration of a Decentralized Cal Grant Program</i> issue paper on the Commission's website.

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IPA Article	Name, School/ Organization	Method of Response	Comment	Response
			Grant Program. My thesis was written on the decentralization of the grant program, and I will continue to work on getting this through. I continue to wonder why a state agency is responsible for administering financial aid programs. "One-stop shopping. Let the schools decide/verify."	
Decentralization/Centralization	Lili Vidal, Interim Director, Financial Aid and Scholarships Department, California State University, Northridge	WRITTEN	<p>"The issues surrounding who is responsible for what work is large and complex and needs agreed-upon resolution. Either a completely decentralized system or completely centralized systems would make sense. We need to reduce the confusion for students and make it as simple a process as possible for them.</p> <p>"I urge you to pay close attention to the recommendations and comments you receive from CSAFAA and GAC who represent the entire financial aid community."</p>	See the <i>Consideration of a Decentralized Cal Grant Program</i> issue paper on the Commission's website.
Decentralization/Centralization	J. Michael Ortiz, Ph.D., President, California State Polytechnic University, Pomona	WRITTEN	<p>"The area of concern that I feel needs further discussion is the issue of a centralized process either at the CSAC or Institution level without the current hybrid aspect. If the hybrid model works best, there should be a clear distinction between responsibilities of the campus and those of CSAC. Other issues are the option of intermingling Cal Grant funds in interest-bearing accounts, calculation of interest on Cal Grant accounts, campus confirmation of high school graduation, and the definition of California residency and the campus confirmation of this.</p> <p>"I am confident that further discussion of these items between the financial aid community and the California Student Aid Commission will result in a new and improved IPA."</p>	See the <i>Consideration of a Decentralized Cal Grant Program</i> issue paper on the Commission's website.
Decentralization/Centralization	Deborah S. McCracken,	WRITTEN	The language of the IPA agreement clearly places institutional responsibilities that require	See the <i>Consideration of a Decentralized Cal Grant Program</i> issue paper on the Commission's website.

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	<p>Director, Financial Aid California State University, Fullerton</p>		<p>additional workload and sometimes “workarounds” to standard institutional processing. As in March 2005, when prior feedback was provided, it is still the opinion that Cal Grant processing should be decentralized and converted to an allocation system where schools administer the awards.</p> <ul style="list-style-type: none"> • Schools have a proven record of accomplishment of spending allocated financial aid funds but if some schools had excess allocated funding, it could be deobligated and the state could redistribute the funding to schools needing more. • Students are confused enough about the financial aid process. They do not understand the role the school performs in the delivery of their Cal Grants. Often students are awarded a Cal Grant but the school cannot disburse the funds for a variety of reasons: the student did not submit verification documents, the student’s education level or other FAFSA data was incorrect, or the student qualified at school A but not at school B. If the campuses controlled the issuing of the Cal Grant awards to students: 1) students would have their complete financial aid packages in one notification, and 2) eligibility would be confirmed by the school before a Cal Grant award is made. • Under the current system, schools 	

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			<p>often cannot make payments in a timely fashion because projected funding levels are not adequate for the entire academic year. Schools must constantly report awards and payments in order to increase their authorizations. As a result, students are left waiting and schools are left explaining endlessly why payment is delayed.”</p>	
Miscellaneous Comments	Sean Smith, Director of Financial Aid, Scripps College	WRITTEN	“Scripps College specifically supports the exclusion of the confirmation of the Cal Grant GPA from the list of campus responsibilities.”	CSAC supports this idea.