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September 07, 2005

## **NASSGAP Letter to Senate HELP Committee Staff on the Proposed Senate Reauthorization. Emailed to Mr. Scott Fleming and Ms. Jane Oates**

Thank you for the opportunity, once again, to comment on the proposed HEA reauthorization. We congratulate you on getting the enormous job done. We especially appreciate the ongoing interaction we've had to help shape the bill in a way that serves our students well and recognizes the importance of the partnership between the Federal and state governments. Following are our specific comments about the bill.

1. Page 184, line 3: By establishing a priority in the allotment, we are concerned that all of the GAP money will go to the states that partner with institutions serving greater than a majority of the students. This hurts the students in those states. We suggest, instead, changing the wording from "secretary shall" to "secretary may."
2. Page 188, line 22: delete "to degree completion." While we understand the intent, that is, to track the students while they continue their education, students drop out or stop out and they may never get a degree. If they return to school they will still be eligible for the GAP award because they will have participated in an early intervention program earlier. No need for those three words.
3. Page 189, line 22. There is at least one state that has NO private degree granting institution so this requirement is impossible. Suggest changing to "not less than 1 degree granting institution..."
4. Page 194, line 4. delete "that is a partner in the partnership." If a student chooses to attend a non-participating school, he loses the grant. That is unfair to the student. Also, the student would not know whether the institution is a partner or not. In addition, it would be extremely difficult to administer since the state award goes to the student, not the school and the state would not know where the student will attend. Same wording occurs on page 195, line 15; 197, line 17; page 198, line 21; and page 200 line 7.
5. Page 195, line 6. Words missing. Line should read "amount that is equal to the average 'cost of attendance' at 4-year ...."
6. Many instances of calling the program "access and persistence grant." Instead, it's supposed to be "grants for access and persistence

(GAP)." This occurs on page 195, line 25; page 196, lines 11 and 20; page 197, lines 22 and 25; page 198 lines 9 and 24; and page 200, lines 12, 16, and 21.

7. Page 202, line 7. This was used for the SLEAP program and proved to be an impediment for state participation. Suggest deleting this "Special Rule."

8. Page 228, lines 1-10. This is one of the biggest concerns for NASSGAP and, indeed, for the entire financial aid community. The community was assured by the Advisory Committee that this wouldn't happen. This section says, essentially, that for a period of up to 5 years, there will be TWO paper forms available for students. Can you imagine the chaos that will occur? The way things are now, guidance counselors put stacks of forms out for students to pick up. Will they pick up both? Will they fill out both? There will be major delays as students complete the wrong form, mass confusion as to which form is given to the student by the guidance community, processing nightmares for the Department, the schools, and the state. We suggest, instead, that at the appropriate time (after testing is done in a test market), the long paper FAFSA be eliminated totally before the EZ-FAFSA is released in paper form.

For those who still prefer to file the long paper FAFSA and may not have access in a safe, convenient place for the family to complete, the long FAFSA can be made available only by request or through a download (which students who don't have home access can always do in school or at the library).

9. Page 248. Add new words, "If a recipient of assistance under this title withdraws from and institution during a payment period of period of enrollment in which the recipient began attendance, the amount of grant or loan assistance (other than assistance under Part C and Subpart 4) to be returned to the title IV programs..." This excludes LEAP/GAP in the institutional refund formula. Educational institutions generally do not know the specific identity of LEAP/GAP assisted students, particularly at the beginning of academic terms when refunds are usually determined.

10. New: add "Notwithstanding any other section of statute, states shall transfer to the Secretary the tracking, collecting, and other administrative activities associated with recipients of the Paul Douglas Teacher Scholarships, in a manner to be prescribed promptly by the Secretary." This provides states with the ability to transfer to the Secretary the responsibility for the tracking of recipients of the now defunct Paul Douglas Teacher Scholarships, and if necessary, collecting refunds owed due to non-performance.

Again, we thank you for this chance to comment. If you have any questions or comments, please contact Bart Astor at (703) 444-1824 or by email at bartastor@cox.net.

Sincerely,

Theresa Antworth  
President  
NASSGAP