

## **SUMMARY OF COMMENTS AND COMMISSION RESPONSE**

The Commission received two written comments during the 45-day review comment period on the proposed regulations. No oral or written comments were received at the September 8, 2022, Commission meeting when the proposed regulations were adopted. CSAC evaluated the written comments received during the 45-day review period and has provided a written response to each of the relevant comments. A non-substantive change and a substantive change were made in response to the written comments provided to the Commission.

**Comment No. 1:** The Institute for Access and Success (TICAS) commented: “in Sec. 30023 (c)(2) why would the Commission **not notify** students after 45 days that students still have 30 days to submit their GPA? Is this due to duplication of efforts? Could you clarify this for us?”

Response: The Commission reviewed the draft language and agrees the word not should be deleted and has made the proposed non-substantive amendment to the regulatory text by removing the word “not.” This non substantive change corrects an existing grammatical error in the California Code of Regulations to improve regulatory clarity and accuracy.

**Comment No. 2:** TICAS commented that, “[in Section 30023 (c) (5)] could you clarify why this only applies to competitive applicants and not CCC entitlement applications? The way I read it was that the Sept. 22<sup>nd</sup> deadline is now for entitlement, not competitive. Any clarity you could provide here would be much appreciated on whether this section is only for competitive and not entitlement.”

Response: There has always been a 20-day window after both the March and September deadlines for the Entitlement and Competitive programs. The intent of subsection (5) is to have language to ensure that when the 20-day deadline falls on a weekend or holiday that the deadline would be shifted to the next business day. In response, the Commission has amended the language to clarify that this applies to all deadlines in this section of the regulations.

**From:** [Ana Fung](#)  
**To:** [Rule Making](#)  
**Cc:** [Emmanuel Rodriguez](#)  
**Subject:** [External]Public Comment RE: Proposed Regulatory Actions - CCC Expanded Entitlement Cal Grant Program  
**Date:** Monday, November 7, 2022 2:00:41 PM  
**Attachments:** [image001.png](#)  
[CSAC Nov2022 Regulations Coalition Support Letter.pdf](#)

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Good afternoon Ms. Alasa-as and team,

I hope you are doing well. Attached you will find a **public comment in the form of a letter of support from The Institute for College Access & Success (TICAS) along with nine other members of the Californians for College Affordability Coalition**, in response to the Commission's proposed regulations regarding the California Community College Expanded Entitlement Cal Grant Program in addition to the proposed amendments to some existing Cal Grant program regulations.

**Separate from the public comment submission**, TICAS also has a couple of questions regarding some of the regulatory language that we're hoping you all can provide some clarity on:

First, in Sec. 30023 (c)(2) why would the Commission **not notify** students after 45 days that students still have 30 days to submit their GPA? Is this due to duplication of efforts?

- *Section 30023 (c)(2): No later than April 16 (forty-five (45) days after the March 2 deadline), the Commission shall inform students who are potentially eligible for entitlement awards based on application information the Commission has received, that their grade point average(s) had not been received by the Commission by the March 2 deadline, and **shall not notify** them that they have until May 16 (75 days from the March 2 deadline) to request the Commission to accept their late grade point average(s) on the conditions specified above, including the submission of the certification specified in subsection (1).*

Second, in that same section under the new sub-section 5 could you clarify **why this only applies to competitive applicants and not CCC entitlement applications**? The way we are interpreting it is that the Sept. 22<sup>nd</sup> deadline is now for both CCC entitlement and competitive award renewals. Any clarity you could provide here would be much appreciated on whether this section is only for competitive and not entitlement.

- *(54) Pursuant to Government Code section 6707, in such cases where the March 22 or September 22 deadline to request late submittal of grade point average(s) on behalf of **competitive applicants** or the May 16 deadline to request late submittal of grade point average(s) on behalf of entitlement applicants falls upon a Saturday, Sunday, or state holiday, the request for late submittal must be postmarked or received by the Commission by the following business day.*

Best,  
Ana

November 7, 2022

California Student Aid Commission  
Attention: Synequeen Alasa-as, Legal Services  
P. O. Box 419026  
Rancho Cordova, CA 95741  
[Rulemaking@csac.ca.gov](mailto:Rulemaking@csac.ca.gov)

VIA ELECTRONIC EMAIL

**RE: Proposed Regulatory Actions Related to the California  
Community College Expanded Entitlement Program**

Dear Ms. Alasa-as,

As advocates of higher education access, affordability, equity, and success united in strengthening state need-based financial aid so that all Californians can afford to successfully earn a high-quality postsecondary education credential, we write to express our support for the California Student Aid Commission's (Commission) proposed regulatory actions regarding the California Community College (CCC) Expanded Entitlement Cal Grant Program. **We appreciate the Commission's efforts to add clarity to existing Cal Grant regulations under Sections 30023 and 30026 of the California Code of Regulations to ensure that the newly established CCC Expanded Entitlement Cal Grant Program is implemented effectively and through a student-centered approach**, which will in turn help more low-income CCC students receive the financial aid that they need to attend college and complete their degrees. These regulations also benefit Cal Grant recipients attending all types of California colleges, including those who transfer from a CCC. Specifically, we support the following regulations and amendments proposed by the Commission:

- Section 30023(c)(2): the original language of this section specifies that any grade point average (GPA) submitted for a Cal Grant A or B entitlement award application after the March 2 deadline must be *received* by the Commission by May 16. Under the proposed amendments, this section would instead require that the applicants *submit or postmark* their delayed GPAs by May 16. This amendment would allow Cal Grant entitlement award applicants from across the state to have additional time and flexibility when submitting their GPAs after March 2.
- Section 30023(c)(3): this proposed section establishes a separate grace period deadline of September 22 for delayed GPA (or appropriate in-lieu test scores) submissions for the CCC Expanded Entitlement Cal Grant applicants, which would be 20 days after the September 2 application deadline for CCC financial aid applicants. It is critical and necessary that applicants have a reasonable grace period to submit the required information so that they are not prevented from receiving financial aid for reasons that may be beyond their control.

- Section 30023(c)(4): this section is amended to include the same changes outlined in Section 30023(c)(2) but for Cal Grant A and B competitive award applications.

The establishment of the CCC Expanded Entitlement Cal Grant program was a monumental policy milestone that has allowed over 170,000 more low-income CCC students to access need-based financial aid without arbitrary barriers such as age and time out of high school.<sup>1</sup> We thank the Commission for not only making sure that applicants to this new Cal Grant program have a clear grace period deadline for any delayed GPA and in-lieu test score submissions but also allowing greater flexibility for those applying to preexisting Cal Grant programs. We look forward to continuing to work with the Commission to further advance meaningful improvements to our state financial aid systems.

Sincerely,

Su Jin Jez, Executive Director, California Competes

Jessie Ryan, Executive Vice President, The Campaign for College Opportunity

Vincent W. Stewart, Vice President, Policy & Programs, Children Now

Brian Rivas, Senior Director of Policy and Government Relations, The Education Trust-West

Debbie Raucher, Director of Education, John Burton Advocates for Youth

Samantha Seng, Legislative Director & Policy Advisor, NextGen California

Derek Steele, Executive Director, Social Justice Learning Institute

Clemaus Tervalon, President, The Student Senate for California Community Colleges

Manny Rodriguez, California Director of Policy & Advocacy, The Institute for College Access & Success

Esmeralda López, California State Director, UnidosUS

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<sup>1</sup> California Student Aid Commission. 2021-22 Cal Grant Offered Awardees. [https://www.csac.ca.gov/sites/main/files/file-attachments/2021-22\\_cal\\_grant\\_program\\_offered\\_awardees.pdf?1652284680](https://www.csac.ca.gov/sites/main/files/file-attachments/2021-22_cal_grant_program_offered_awardees.pdf?1652284680).