

GPA VERIFICATION FOR CAL GRANT ENTITLEMENT AWARDS

Recommendation for Executive Order

To ease administrative barriers for students that would otherwise qualify for a Cal Grant Entitlement award ([High School Entitlement](#) or [Transfer Entitlement](#)), the Administration should consider postponing the deadline by which students must verify their grade point average (GPA) from *March 2, 2020* to *September 2, 2020*.

Estimate of Students Potentially Impacted

According to the [Race to Submit](#) dashboard, there are **4,083 students** who have completed the appropriate financial aid application but are missing a verified GPA for Cal Grant consideration.

Relevant Statute(s): Education Code Sections [69434\(b\)\(1\)](#), [69435.3\(a\)\(1\)\(A\)](#), [69436\(b\)\(1\)](#)

Background

GPA Verification Process

To be considered for a 2020-21 new Cal Grant Entitlement award, a completed financial aid application and a certified Grade Point Average (GPA) must be submitted by the March 2nd deadline. GPAs are accepted only if certified by a school electronically or if submitted by a student via the [Cal Grant GPA Verification Form \(G-4\)](#). Pursuant to [Assembly Bill 1091](#) (Garcia, Chapter 637, Statutes of 2015-16), high schools are required to submit their first round of GPA verifications for their student seniors by October 1st of the application year. This allows the Commission to start processing awards early (before the March 2nd deadline) given that financial aid applications open starting October 2nd.

GPA Verification Appeals Process

State regulations ([5 CCR § 30023](#)) allow Cal Grant applicants to appeal the late submission of their Cal Grant GPA via the [Late Cal Grant GPA Appeal Form \(G-17\)](#) if circumstances beyond their control delayed or prevented them from submitting a verified GPA by the March 2nd filing deadline. Schools can also appeal the GPA submission deadline by submitting [appeal letters](#). The deadline for late GPA appeals is May 18th, 2020.

Problem/Issue

The Commission has already received most of the required GPA submissions for the 2020-21 Cal Grant Entitlement awards. However, the late GPA appeal process for entitlement awards allows students and schools to submit late GPA appeals to the Commission until May 18th. Because schools are closed during the COVID-19 health crisis, the Commission's Call Center has received several calls from students that they will not be able to meet the late GPA appeal deadline because their school is closed. Furthermore, the late GPA appeal process can be very time-consuming because of the review process.

The Commission recommends extending the Cal Grant GPA submission deadline to September 2nd so that students can bypass the appeals process altogether and have until Fall to submit their verified GPA. Entitlement awards are processed on a weekly basis, so as long as the Commission receives a verified GPA by September 2, students would still be processed for Cal Grant consideration early in the academic year.

Alternative Options/Considerations

Waiving GPA Verification

Postponing the GPA verification deadline begs the question: Why not waive the requirement for 2020-21 altogether – at least for those that are currently appealing for late GPA submission? The Commission has considered this option but still recommends postponement of the requirement rather than waiving the requirement. The Commission's Grant Delivery System (GDS) requires a GPA entry to process a Cal Grant award. If the Commission were to waive the GPA verification requirement for a specific population of students, this would require significant staff work to re-program GDS and would still delay the distribution of awards.

GPA Verification for Competitive Cal Grant

Another issue that the Commission considered was postponing the GPA verification deadline for the Competitive Cal Grant program as well. However, the Competitive Cal Grant program has several different deadlines and requirements to consider:

- Competitive Cal Grant for High School students: deadline to apply is **March 2nd** of application year and deadline to submit a verified GPA is **March 23rd**
- Competitive Cal Grant for California Community College (CCC) transfer students: deadline to apply and submit a verified GPA is **September 2nd** of the award year

Furthermore, the [Competitive Cal Grant](#) program has a limited number of new awards to disburse each year, and GPA is needed for the scoring matrix to determine which applicants will receive a Competitive award. Competitive awards are processed in cycles rather than on an ongoing basis. Thus, delaying the GPA verification deadline to September 2nd (for High School students) would significantly delay awarding since the Commission will have to process one-by-one as GPAs are submitted.

HIGH SCHOOL VERIFICATION FOR HIGH SCHOOL ENTITLEMENT CAL GRANT**Recommendation for Executive Order**

To ease administrative barriers for students that would otherwise qualify for a Cal Grant High School Entitlement award, the Administration should consider waiving the requirement that students verify their high school graduation for the 2020-21 award year.

Estimate of Students Potentially Impacted

In the 2018-19 award year, the Commission withdrew 6,768 Cal Grant Entitlement awards from students for failure to verify high school graduation. For the 2019-20 award year, there are currently 1,771 Cal Grant Entitlement awardees that have still not yet verified high school graduation and therefore have not received payment. **High school graduation verification for 2020-21 awards will open in May 2020, once high school graduations start taking place.**

Relevant Statute(s): Education Code Sections [69432.92](#), [69433.9\(e\)\(2\)](#), [69434\(b\)\(8\)](#), [69435.3\(a\)\(8\)](#), [69436\(b\)\(9\)](#)

Background**Graduation Verification for High School Entitlement awards**

To receive a High School Entitlement award, a student's high school graduation must be verified after meeting all other eligibility requirements. If the high school or student fails to verify high school graduation, there will be a hold on student payment.

High schools and high school districts are [required](#) to verify the graduation of their pupils (via WebGrants) as soon as possible upon graduation but no later than August 31st. If graduation cannot be verified (i.e. due to transferring or summer school), students have the option of self-certifying high school graduation. In this scenario, students are required to submit a copy of their high school diploma or equivalent upon graduation and a High School Graduation Certification form (G-8).

If there are remaining students that applied for financial aid but whose high school verification is still pending, the Commission will send records of those students to the California Department of Education (CDE) at the end of the calendar year. By the spring of the award year, the Commission receives a data match from CDE confirming graduation for many of those students. On average each year, the Commission verifies graduation for approximately 17,000 students via the CDE data match. (Source: CSAC data).

Graduation Verification for Transfer Entitlement awards

Transfer entitlement recipients can verify their high school graduation on the [Cal Grant Transfer Entitlement Certification Form \(G-6\)](#). This self-certification process for transfer entitlement students **does not** require proof of a high school diploma or equivalent because transfer entitlement recipients are transferring from a CCC where a high school diploma or equivalent is already required for admission.

Graduation Verification for Competitive awards

The Competitive Cal Grant program does not require high school verification (Education Code Section [69437.6](#)).

Problem/Issue

With high schools being closed during the COVID-19 crisis, the process of verifying high school graduation may be burdensome for school districts and high school administrators. Furthermore, if schools are unable to complete this requirement, this administrative barrier falls on the student and could potentially delay their receipt of financial aid. For students whose high school graduation is verified through our CDE data match, their payment hold is typically removed during March or April of the award year, which is well into the second semester of their academic year. Waiving the high school verification requirement will allow the Commission to bypass the lengthy process of data-matching with CDE. Given that students are already struggling with COVID-19 economic decline, it is imperative we administer aid to students as quickly as possible to prevent college dropout or burdensome college debt.

Furthermore, if students are attending a California Community College or a Cal Grant-eligible four-year institution, a high school diploma (or equivalent) is already required for admission to these campuses. Therefore, high school graduation verification for the purposes of state financial aid is a redundant and unnecessary administrative process that only seeks to exclude otherwise eligible students.

Alternative Options/Considerations

An alternative option would be to allow students to receive aid immediately (upon completion of other eligibility criteria) and allow high school verification to take place at a later time. The Commission does not recommend this alternative option as this would simply be pushing an administratively complex process further down the line and given the devastating impacts COVID-19 has already had on California, recovery for students and school districts will take years. Waiving high school verification (either temporarily or permanently) conforms with recommendations made by the [Cal Grant Reform Work Group](#) to streamline Cal Grant eligibility requirements.

SELECTIVE SERVICE REGISTRATION FOR UNDOCUMENTED STUDENTS**Recommendation for Executive Order**

To allow undocumented students to continue to access state aid during the COVID-19 crisis, the Administration should consider waiving the Selective Service registration requirement for undocumented students for the 2020-21 award year.

Estimate of Students Potentially Impacted

For the 2019-20 academic year, 1,969 undocumented students were awarded a Cal Grant that were required to register with Selective Service. So far, for the 2020-21 academic year, there are **1,845 undocumented students** that have been awarded a Cal Grant Entitlement award and are required to register with Selective Service. The Commission has not yet processed Competitive Cal Grants so there may be additional undocumented students that qualify in the coming months.

Relevant Statute(s): Education Code Sections [69433.9\(b\)](#), [69400](#)

Background

To be eligible for a Cal Grant award, a student must be in compliance with all applicable federal Selective Service Registration requirements. This means that with very few exceptions, all males between the ages of 18 and 25 (including undocumented males) must register with the Selective Service System.

Students that do not have a social security number (SSN), or have been issued an SSN through the Deferred Action for Childhood Arrivals (DACA) program, can apply for state aid via the California Dream Act Application (CADAA) and then register for Selective Service by completing a paper [Selective Service Registration form](#). These forms are then mailed to the U.S. Selective Service Registration Information Office. Once the form is processed, students will receive a Registration Acknowledgment in the mail that they can send their financial aid office (normally 4-6 weeks to process manual forms). Once financial aid offices receive a copy of the Registration Acknowledgement, they may disburse the award. Note that there is **no** option to submit Selective Service registration [online](#) for students without a social security number.

Problem/Issue

As campuses have been working with undocumented students to complete their Selective Service registration via paper forms, the U.S. Selective Service Registration Information Office has been informing campuses that they have halted all paper registration processing due to COVID-19 telework requirements. This affects students' financial aid processing. Campuses have requested that the Commission temporarily suspend this requirement for undocumented students – at least until the U.S. Selective Service Registration Information Office resumes processing paper registration forms – so that students can still receive their Cal Grant award.

Alternative Options/Considerations

If temporarily waiving the Selective Service registration requirement for undocumented students to receive state aid is not feasible, there may be alternative mechanisms of certifying that students submitted the registration form. For example, the Commission could require students to self-certify via WebGrants for Students that they submitted the Selective Service registration

form, rather than campuses requiring that students submit a copy of their Registration Acknowledgement. Alternatively, the self-certification process could be done at the campus level. The self-certification process is currently used to verify that students with dependents receiving a \$6,000 access award have dependents under the age of 18.

This alternative option would not necessarily require an Executive Order but would still present administrative barriers to students. It may also place administrative burdens on campus financial aid offices who are currently grappling with how to administer federal stimulus funding.