

MISSISSIPPI POST-SECONDARY EDUCATION FINANCIAL ASSISTANCE BOARD



IHL Executive Offices, Room 218
3825 Ridgewood Road, Jackson, MS 39211

March 27, 2020 at 9:00 a.m.

Teleconference
1-888-822-7517, Access code: 2791682#

Agenda

CALL TO ORDER

ITEMS FOR CONSIDERATION

1. Discuss the impact of COVID-19 on the 2020-2021 application cycle for the Higher Education Legislative Plan for Needy Students Grant (HELP).....1
2. Discuss the impact of COVID-19 on students' ability to meet the grade and full-time continuous enrollment requirements for maintaining state aid eligibility2
3. Discuss temporary debt relief for state forgivable loan borrowers.....9

ADDITIONAL AGENDA ITEMS IF NECESSARY

EXECUTIVE SESSION

ADJOURNMENT

AGENDA

1. **Discuss the impact of COVID-19 on the 2020-2021 application cycle for the Higher Education Legislative Plan for Needy Students Grant (HELP).**

The application for all state aid programs, including the Higher Education Legislative Plan for Needy Students (HELP) Grant, opened on October 1, 2019. The application has been accessible and running with no interruption since opening. For HELP Grant eligibility, the online application is due March 31, and supporting documents, including the FAFSA, are due one month later on April 30. The online application can be completed on a computer or mobile device (tablet, phone, etc.).

Below is an excerpt from the HELP Rules and Regulations:

Title 10: Education Institutions and Agencies

Part 615: Higher Education Legislative Plan for Needy Students Grant (HELP) Rules and Regulations

Chapter 1: Higher Education Legislative Plan for Needy Students Grant (HELP) Rules and Regulations

Rule 1.1 Higher Education Legislative Plan for Needy Students Grant (HELP) Rules and Regulations. These Rules and Regulations are subject to change by the Mississippi Postsecondary Education Financial Assistance Board. All eligible students shall receive a Higher Education Legislative Plan for Needy Students (HELP) award; however, the amount of each award depends upon the availability of funds as authorized by the State Legislature.

I. GENERAL ELIGIBILITY

...

- E. The applicant must complete an online application on or before March 31 during the spring prior to the aid year for which the student is seeking assistance and submit all required supporting documents by April 30 of the same year.

II. APPLICATION REQUIREMENTS

A. First-time applicants must:

- 1. Complete an initial application online at www.mississippi.edu/financialaid on or before March 31 during the spring prior to the aid year for which the student

AGENDA

is seeking assistance and within two (2) years of the student's high school graduation.

2. Submit by the document deadline of April 30:

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3. File the Free Application for Federal Student Aid (FAFSA) by the document deadline of April 30.

4. Submit the Household Verification Worksheet by the document deadline of April 30.

B. Renewal Applicants Must:

1. Complete a renewal application online at www.mississippi.edu/financialaid on or before March 31 during the spring prior to the aid year for which the student is seeking assistance.

2. File the Free Application for Federal Student Aid (FAFSA) annually by the document deadline of April 30.

3. Submit the Household Verification Worksheet by the document deadline of April 30.

Source: *Miss. Code Ann.* § 37-106-75.

2. Discuss the impact of COVID-19 on students' ability to meet the grade and full-time continuous enrollment requirements for maintaining state aid eligibility.

The COVID-19 pandemic has disrupted every aspect of American life, including higher education. Because of the pandemic, thousands of students across the state were asked to leave campus, even though campus is where many students have housing and food security as well as computer access and dependable internet. Students have also been asked to adapt to an online delivery format for all courses, including science labs. These changes will inevitably impact performance for some students for the Spring 2020 term. Some students will withdraw completely, some students will withdraw from certain classes, and some students will remain enrolled but will not perform well in the new online environment.

The following state aid programs require students to maintain a specific GPA each term and to maintain continuous, full-time enrollment for continuing eligibility:

- Mississippi Resident Tuition Assistance Grant (MTAG)
- Mississippi Eminent Scholars Grant (MESG)
- Higher Education Legislative Plan for Needy Students Grant (HELP)

AGENDA

- Law Enforcement Officers and Firemen Scholarship (LAW)
- Nissan Scholarship (NISS)

Institutions are already taking steps to address course performance/grade issues. SFA can continue to accept grades as reported by the institution per the grade policy. SFA is seeking guidance from the Board concerning the full-time continuous enrollment policy.

The current grade policy is as follows:

Title 10: Education Institutions and Agencies

Part 605: General Administration Rules and Regulations

Part 605 Chapter 1: General Administration Rules and Regulations

Rule 1.1 General Administration Rules and Regulations.

II. DETERMINING ELIGIBILITY

D. Special Issues Related to Determining Eligibility

7. Grade Point Average - To be eligible and maintain eligibility for state financial aid, recipients must have a minimum Grade Point Average (GPA).
 - a) For first-time college students, the Office accepts the seven-semester high school GPA, as certified by the high school counselor or other school administrator. Most Mississippi high schools submit a high school Grade File directly to the Office, which includes the seven-semester high school GPA and ACT/SAT scores for all graduating seniors. However, the Office may request this information from a student if the high school does not submit a Grade File. The Office will not calculate GPAs. After a student's initial year in college, the Office will not accept high school GPAs that have been recalculated for reasons such as a change in the high school grading scale or high school grading policy.
 - b) For continuing college students, the Office accepts the overall cumulative college GPA, as calculated and certified by the registrar at the end of each term or year. The college GPA is reported directly to the Office at the end of each term by the college in a Grade Report. A student should not submit a transcript at the end of each term unless requested by the Office. The Office will not calculate GPAs, but will accept the GPA calculated by the college.

AGENDA

The current full-time, continuous enrollment policy is as follows:

Title 10: Education Institutions and Agencies

Part 605: General Administration Rules and Regulations

Part 605 Chapter 1: General Administration Rules and Regulations

Rule 1.1 General Administration Rules and Regulations.

II. DETERMINING ELIGIBILITY

4. Continuous Full-Time Enrollment

a) Full-time Enrollment - For some state aid programs, a student must enroll full-time and maintain continuous full-time enrollment as a requirement for eligibility.

(1) Full time enrollment for undergraduate students is defined as follows, unless exceptions are made for all students in a specific program at a specific institution:

(a) Fifteen (15) earned semester hours each academic term (excluding summer) or nine (9) earned trimester hours per academic term or twenty-four (24) earned clock hours per week for a program using clock hours.

(b) Hours must be reported by a single institution.

(c) Hours may be undergraduate or graduate course hours as long as the student is pursuing an undergraduate degree.

(2) Full-time enrollment for graduate students will be determined by the attending institution.

b) Grade of “Incomplete” and Full-time Enrollment - If a student benefits from state aid during any term and the student receives one or more grades of “incomplete”, and the “incomplete” causes the number of hours reported as earned by the institution to be less than full-time, the Office will not disburse funds scheduled for the next period of enrollment until the “incomplete” is successfully removed and the student is otherwise eligible.

AGENDA

- c) Intersession or Minisession and Full-time Enrollment - The Office will follow the federal guidelines for considering enrollment in intersessions or minisessions. A short nonstandard term may be treated as part of one of the standard terms, and the combined terms may be considered to be a single standard term as long as the combined term is the same for all students at the institution. Hours taken in the intersession must count towards a student's enrollment status for the combined term and costs for the intersession must be appropriately included in the cost of attendance.

- d) Continuous Full-time Enrollment - Continuous full-time enrollment is defined as full-time enrollment for two consecutive semesters, three consecutive trimesters, or the equivalent in each successive academic year. The summer term will not qualify as a period of full-time enrollment since funds for most programs are not available for summer terms. The following examples demonstrate how this policy will be administered:
 - (1) Example 1: A student fails to enroll for fall or is enrolled less than full-time, but subsequently enrolls full-time for spring. The student is not eligible to receive the funds for fall or spring as the student does not meet the continuous enrollment requirement.

 - (2) Example 2: A student is enrolled full-time for spring, but withdraws (without cause) or drops below full-time status after receiving state financial aid funds for spring. The student is not eligible to receive funds for the following fall term.

- e) Cooperative Education Programs and Continuous Full-time Enrollment - A student who participates in an approved Cooperative Education Program and therefore attends school on alternate semesters is considered to have maintained continuous enrollment for state aid purposes. The eligible institution where the student is enrolled will report the student as being enrolled in an approved Cooperative Education Program on the Enrollment Verification Report. The student will not need to provide any special documentation to the Office.

- f) Internships and Continuous Full-time Enrollment - A student who experiences a break in continuous full-time enrollment due to the completion of a qualifying internship during the fall, winter, or spring term(s) may submit an appeal to receive aid the following term. To qualify, an internship must either be required by the attending institution or lead to earned credit hours.

AGENDA

- g) Remedial Courses and Full-time Enrollment - Remedial or developmental courses should be graded as PASS or FAIL. Grades earned in developmental courses should not be calculated into the cumulative grade point average; however, hours enrolled in developmental courses may be counted to determine enrollment status.

The process for appealing determinations of ineligibility is as follows:

Title 10: Education Institutions and Agencies

Part 605: General Administration Rules and Regulations

Part 605 Chapter 1: General Administration Rules and Regulations

Rule 1.1 General Administration Rules and Regulations.

II. DETERMINING ELIGIBILITY

E. Appealing Determinations of Ineligibility

1. A student who applies for state financial aid and is determined to be ineligible due to 1) full-time enrollment status, 2) continuous full-time enrollment status, or 3) satisfactory academic progress may appeal to the Office in writing.
2. The Office will not hear appeals related to deadline dates, residency, grade point average (either high school or college), and ACT/SAT scores. If the Office has made a determination of eligibility based on an incomplete/incorrect transcript or grade verification, the student should have the high school or college submit an official updated grade verification directly to the Office.
3. The appeal process is as follows:
 - a) Student submits a Mississippi Office of Student Financial Aid Appeal Form which addresses the reason why the student was deemed ineligible and the reason why the Office should consider making an exception to the eligibility requirement. Acceptable reasons for appeal include:
 - (1) Student or, in some cases, an immediate family member undergoes a significant personal event that prevents the student from maintaining continuous full-time enrollment.

AGENDA

- (a) An immediate family member is defined as a parent, spouse, sibling, or child.
 - (b) A significant personal event includes serious medical problem or illness, accident or injury, divorce, abuse, death of an immediate family member, or military service.
- (2) Student is nearing degree completion and does not have enough hours remaining to warrant continuous full-time enrollment. Such students may appeal for an exception for a single term. No appeal will be accepted, and no aid will be disbursed for any semester carrying less than 6 hours.
 - (3) Student experiences a break in continuous full-time enrollment due to the completion of a qualifying internship during the fall, winter, or spring term(s). To qualify, an internship must either be required by the attending institution or lead to earned credit hours.
- b) The personal event appeal should be accompanied by appropriate supporting documentation
 - (1) For a medical problem or serious illness (physical or mental), the supporting documentation must include appropriate medical reports that identify the inception and duration of the illness. Supporting document(s) should clearly indicate whether the medical condition is under control, thus allowing the student to meet all eligibility requirements. Supporting documents should include, but are not limited to, medical reports and letters from a doctor or professional counselor.
 - (2) For an accidents or injury, the supporting documentation must identify the date of the accident or injury and describe the resultant medical problems. Supporting documents should include, but are not limited to, police and medical reports.
 - (3) For a family problem such as divorce, abuse, and death or serious illness of an immediate family member, the supporting documentation must identify the student's relationship to the family member(s) involved and the inception and duration of the problem. Clearly state what actions have been taken to manage the problem, thus allowing the student to meet all eligibility requirements.

AGENDA

Appropriate supporting documents include, but are not limited to, police and/or medical report(s), death certificate, divorce decree, and letter(s) from a professional counselor.

- (4) For military service, supporting documentation must identify the dates and status of the student's military tours of duty. Appropriate supporting documents include military orders and discharge papers.
- c) Only one appeal will be considered per personal event. Any additional appeals must demonstrate a new mitigating circumstance beyond the student's control.
- d) The nearing degree appeal should be accompanied by a letter on institutional letterhead from the appropriate dean, director, or academic advisor. The letter from the faculty/administrator should indicate 1) the expected graduation date, 2) the total number of hours the student needs to complete his/her degree, and 3) the number of hours the student intends to take each term.
- e) The internship appeal should be accompanied by a letter on institutional letterhead from the appropriate dean, director, or academic advisor that states the date of the internship, the number of credits received, and if required by the institution.
- f) The Mississippi Office of Student Financial Aid Appeal Form and supporting documentation should be mailed to the Mississippi Office of Student Financial Aid, 3825 Ridgewood Road, Jackson, MS 39211. The Appeal Form and documentation may also be faxed to 601-432-6527 or emailed to sfa@mississippi.edu.
- g) The Mississippi Office of Student Financial Aid Appeal Form along with supporting documentation is reviewed by a Program Administrator to ensure that the issue may be considered for appeal.
- h) The Program Administrator presents the Mississippi Office of Student Financial Aid Appeal Form, supporting documentation, and any other necessary documentation/data related to the student's file to the Appeals Committee.
- i) The Appeals Committee reviews information. The Committee may request additional information from the student and/or other parties.

AGENDA

- j) The Appeals Committee issues a decision. The Committee's decision is final. The Director of Student Financial Aid is not authorized to overturn the decision of the Appeals Committee.
- k) The decision is delivered in writing to the student and a copy is kept for the student's file.
- l) There is no deadline for appeals. Appeals are received and considered year-round.

3. Discuss temporary debt relief for state forgivable loan borrowers.

The rules and regulations of state forgivable loans outline provisions for an initial grace period and the following types of deferment: service, residency, in-school, temporary disability, and military. No provision is made for a hardship deferment. In anticipation of the economic downturn expected as a result of the COVID-19 pandemic, the Board may consider temporarily authorizing provisions for a hardship deferment of no more than six months to be granted upon written request from borrowers in the following programs:

- Critical Needs Alternate Route Teacher Forgivable Loan (CNAR)
- Critical Needs Teacher Forgivable Loan (CNTP)
- Teacher Education Scholars Forgivable Loan (TES)
- William Winter Alternate Route Teacher Forgivable Loan (WWAR)
- William Winter Teacher Forgivable Loan (WWTS)
- Health Care Professions Forgivable Loan (HCP)
- Nursing Education Forgivable Loan, BSN (NELB); RN to BSN (NELR); MSN (NELM); RN to MSN (NERM); and Ph.D./DNP (NELP)
- Family Protection Specialist Social Worker Forgivable Loan (SWOR)
- Counselor and School Administrator Forgivable Loan (CSA)
- Graduate Teacher Forgivable Loan (GTS)
- Southern Region Education Board Doctoral Scholars Forgivable Loan (SDSP)
- Critical Needs Dyslexia Therapy Teacher Forgivable Loan (CNDT)
- Nursing Teacher Stipend (NTSP)
- State Dental Education Forgivable Loan (DENT)
- State Medical Education Forgivable Loan (MED)
- Southern Regional Education Board Regional Contract Forgivable Loan (SREB)
- Graduate and Professional Degree Forgivable Loan (STSC)
- Veterinary Medicine Minority Forgivable Loan (VMMP)
- Speech-Language Pathologists Forgivable Loan (SLPL)

Below is an excerpt from the General Administration Rules and Regulations with suggested language to authorize provision of a hardship deferment.

Title 10: Education Institutions and Agencies

AGENDA

Part 605: General Administration Rules and Regulations

Part 605 Chapter 1: General Administration Rules and Regulations

Rule 1.1 General Administration Rules and Regulations.

V. Loan Repayment and Servicing Process

E. Grace Period and Other Deferments

A deferment is a postponement of payment for a defined period of time for a specific purpose. The grace period is a type of deferment.

1. Grace Period

- a) Loan recipients who complete their approved program of study receive a grace period, which is outlined in the Master Contract and Note signed by the student prior to receiving any award from the Office.
- b) Most forgivable loans carry a 12-month grace period, but some carry only a 1-month grace period. The Master Contract and Note details the duration of the grace period.
- c) The student borrower may utilize the grace period to seek and secure qualifying employment.
- d) A loan recipient who does not complete the approved program of study will not be granted a grace period and will enter repayment immediately upon separation from the approved program of study. In some cases, such a recipient may be eligible for an in-school deferment.

2. Residency Deferment

- a) A residency deferment is available to students in specific loan programs. These deferments are outlined in the Master Contract and Note.
- b) At the beginning of each year of residency, the loan recipient should submit a Residency Deferment Form.

3. In-School Deferment

AGENDA

- a) A loan recipient who does not complete the approved program of study, but remains enrolled at least part-time, may request deferment for the purpose of remaining in school.
- b) The in-school deferment must be requested in writing to the loan servicer and must be accompanied by verification of at least part-time enrollment from the attending institution.
- c) The in-school deferment must be requested by the recipient and approved every term (except Summer) throughout the duration of the deferment.

4. Temporary Disability Deferment

- a) A loan recipient who is unable to secure or continue employment because of temporary disability may request deferment.
- b) To qualify, a recipient must be unable to work and earn money due to the disability for at least sixty (60) days or be providing continuous care for a dependent or spouse during a period of at least (90) consecutive days.
- c) The temporary disability deferment must be requested in writing to the loan servicer and must be accompanied by certification from a Doctor of Medicine or Osteopathy who is legally authorized to practice medicine.
- d) The temporary disability deferment must be requested by the recipient and approved every six (6) months throughout the duration of the deferment and condition for a total period of time not to exceed three (3) years.

5. Military Service Deferment

- a) In terms of military service, the following definitions shall apply:
 - (1) **REQUIRED** military service is that service which is required of an individual in the service of the Armed Forces of the United States; it does not include a military service obligation incurred to repay a grant, stipend or scholarship.

AGENDA

- (2) OBLIGATED or VOLUNTARY military service is that service which is performed by the individual in repayment of a debt owed the United States government as a result of military scholarships, ROTC scholarships, etc. received by the individual. Service is VOLUNTARY if the individual is not obligated to incur a period of military service but chooses to incur the service obligation.
 - b) A loan recipient may request deferment during the time of required military service.
 - c) The military deferment must be requested in writing to the loan servicer, stating the beginning and ending dates of the required military service, and must be accompanied by a copy of the military orders.
 - d) The military deferment must be requested and approved on a year-to-year basis (annually).
 - e) If a loan recipient continues military service for any reason beyond the REQUIRED time, then that person shall be declared ineligible for additional military deferment.
 - f) If a recipient obligates himself/herself to VOLUNTARY military service, then the recipient shall be declared ineligible for military deferment.
6. Hardship Deferment
- a) A loan recipient who is unable to make payments because of financial hardship as a result of COVID-19 may request deferment.
 - b) The hardship deferment must be requested in writing to the loan servicer along with an explanation for the request.
 - c) The hardship deferment may be approved for a total period of time not to exceed six (6) months.