March 1, 2021

TO: Financial Aid Administrators

FROM: Becky Thompson, Director of Student Financial Assistance

SUBJECT: Guidance and Next Steps – Undocumented Student Relief Grants

BACKGROUND

Engrossed Substitute House Bill 1368 was signed into law by Governor Inslee on February 19, 2021. This legislation provides a $5 million appropriation (Section 14) to serve undocumented students who need emergency funding and are enrolled during the 2020-21 academic year at a participating institution.

Funding must be disbursed to students by June 30, 2021.

Distribution of Funding: The funds will be allocated to eligible institutions participating in the state aid programs using a fair share model. This model considers Undocumented WASFA filers who were Washington College Grant (WCG) eligible at each college as of the Winter 2021 Interim report, in relation to the total WCG eligible for the same demographic.

Please note that not all colleges have students who meet this definition, and allocations will vary significantly. In general, colleges will be receiving approximately $2,050 in funding for each student who meets this definition but can be used to serve a broader undocumented student population. See below.

WHO IS ELIGIBLE

Colleges have discretion as to how they will be awarding the funding to eligible students. To the extent possible, student funding is to be similar to funding received by students who were eligible for federal COVID emergency funding (CARES/HEER student emergency financial aid) but does not have to include consideration of any future federal funding that is unknown at this time.

Students must meet the following eligible student criteria as defined in RCW 28B.96.010.

> "Eligible student" means a student who:
> > (a) Is a resident student;
> > (b) Demonstrates financial need;
> > (c) Is making satisfactory progress;
> > (d) Fills out the Washington application for state financial aid; and
> > (e) Does not qualify for federally funded student financial aid because of their citizenship status.

These funds may only be disbursed to students who were NOT eligible, and did not receive assistance from Federal CARES/HEER student emergency financial aid grants.

Note that colleges will receive funding based on students who have filed a 2020-21 WASFA and are eligible for Washington College Grant. However, colleges have discretion to serve students more broadly, including students in short-term certificate programs or graduate students, if they otherwise meet the eligibility criteria above.

These funds are intended for the student and cannot be disbursed to other non-students in the household.

Completing a WASFA may be waived if it is not needed for other purposes and the college has determined the student needs emergency funding.

Resident student for this purpose is defined in RCW 28B.96.010(5)(a)-(d) and is broader than residency requirements for other state financial aid programs, including Washington College Grant and College Bound Scholarship. Specifically note RCW 28b.96.010(5)(a):

> (5) "Resident student" means:
>
> > (a) A financially independent student who has had a domicile in the state of Washington for the period of one year immediately prior to the time of commencement of the first day of the semester or quarter for which the student has registered at any institution and has in fact established a bona fide domicile in this state primarily for purposes other than educational;

Grants awarded to eligible students under this section must NOT be included in any financial need calculation when awarding state financial aid, nor require any adjustment in already disbursed state aid.

AWARDING POLICY

Each institution shall develop a policy for awarding these funds to ensure equitable awarding and distribution. WSAC recommends a process that is as student friendly and low barrier as possible. We encourage you to be as inclusive as possible.

Factors to consider and/or include:

- How will it be promoted?
- How will students apply?
- How will award amounts be determined?
- How recipient privacy will be protected?

REPORTING REQUIREMENTS

These funds will not be included in student level record reporting on Interim Reports or Unit Record Reports. Colleges will be required to report the following in a fillable form document:

- Total funds awarded
- Number of students served
  - By undergraduate/graduate

IDENTIFYING ELIGIBLE STUDENTS

Students with a 2020-21 WASFA on file and receiving Washington College Grant

WSAC allocated funds by identifying the number of students that filed a WASFA and were eligible to receive Washington College Grant in 2020-21, as of winter interim. A college can pull the same list of students and then verify that they do not qualify for federally funded student financial aid because of their citizenship status, and did not receive assistance from Federal CARES/HEER student emergency financial aid grants.

Please note: Not all WASFA filers are undocumented students.

Colleges are not required to have a student complete an application for funding, if the college can determine the student meets the eligibility criteria through documentation already on file.

Students do not need to be currently enrolled, as long as they were during the 2020-21 AY. Colleges can also serve students that meet eligibility for the funding and enroll in the coming spring 2021 term.

Other Potentially Eligible Students

Colleges may provide funding to a broader student population as long as the student meets the eligibility criteria outlined in WSAC guidance.

Colleges are not required to have a student complete an application for funding, if the college can determine the student meets the eligibility criteria through documentation already on file.

If a college needs to collect data to determine eligibility, note that financial need for the purposes of this funding is defined broadly and can be any COVID related expense and does not need to be specifically educational related, only that there is a need.

Privacy Concerns

WSAC recommends that colleges use caution in how this aid is recorded in college systems, as to not inadvertently disclose citizenship status. For example, using an aid description without the word undocumented, such as "state student relief grant."

As with all state financial aid, colleges and staff administering these grant dollars must abide by all appropriate student privacy laws including FERPA and the WASFA privacy.

ADDITIONAL CONSIDERATIONS: AS VOICED BY STUDENTS AND ADVOCATES

WSAC engaged with community advocates and students on the use of the funding. Some themes from these conversations are provided below as possible considerations as colleges are developing awarding policies.

Award Value

➢ Many expressed a desire for colleges to send funding quickly and as automated as possible to students, without requiring an application.

➢ Some expressed support for establishing an automatic $1,500 per student award (without additional application required) and then any remaining funds to be used to serve those either needing additional dollars or who may not have filed a WASFA but have need for the emergency relief as an undocumented student.

Partnership Recommendations

➢ Financial aid may partner with various campus departments and student affiliation groups, thinking specifically about where are the staff and groups on campus that students might trust most.

➢ Financial aid may partner with local community organizations that support undocumented students, thinking specifically about what organizations students might trust most.

Messaging

➢ Several requests for transparency and accountability for ensuring timely delivery:
   - Awarding criteria and process should be shared across campus and with all financial aid staff so that students can receive complete information without having to talk to multiple campus staff.
   - Messaging should address privacy protections.

➢ Some ideas around messaging, like fliers, social media, or PowerPoint slides, that can be displayed many places that students engage, for example, logging onto campus systems and asking instructors to show the slide as students are logged on virtually before classes begin.