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

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.¹ 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