A Shifting Landscape:

A History of the National Association of Student Financial Aid Administrators

2006-2011

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NASFAA
NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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TABLE OF CONTENTS

INTRODUCTION

In 2016, the National Association of Student Financial Aid Administrators (NASFAA) will celebrate its 50th year as an organization. Since its founding in 1966, it has undergone numerous changes and endured many challenges, but its mission as the largest professional association devoted to the practice and profession of student financial aid administration has always remained at its core. As this historic anniversary approaches, this project seeks to update prior histories of the association, focusing on the recent and pivotal period from 2006 to 2011. However, we endeavor to do more than simply update a timeline of organizational happenings. Rather, we attempt to construct a broad narrative of the association that places it firmly in the landscape of U.S. higher education at the time.

Two principles guided our work. First is the perspective that no single historical truth exists to be uncovered and told, but historical analysis can help us to see patterns in past events (Gaddis, 2002). With that in mind, we looked for recurring topics, themes, and issues as we read primary documents and conducted interviews. Undoubtedly, different interpretations of the data may exist, particularly among those who experienced events firsthand. This leads to our second guiding principle: It is not our intent to recreate an exhaustive narrative of past events, but rather to offer a broad perspective from a somewhat removed vantage point. Romano (2012) put it aptly: "[H]istory is only useful when it is a representation, not a reproduction; it must make the past legible to those who seek to learn something about it," (p.32). Of course, the period under consideration in this project is in the very recent past, which constitutes its own set of challenges, as well as benefits.

A particular challenge in conducting research on recent history is that the past is "not yet dead." A common defining characteristic of historical work is a distinct break between the past and the present (Romano, 2012). Obviously, no such break exists between the conduct of this study and its period of focus. If temporal distance affords perspective and objectivity, then both are lacking in this work. However, given our guiding principles we feel that this narrative benefits from access to oral histories, a rich trove of primary documents, and the ability to triangulate our interpretations with key figures from the period. Yet, we acknowledge that in many respects the story we tell here has yet to end. Certainly, with the passage of more time our conclusions and understandings might change. This is not antithetical to our work, but rather the nature of historical interpretation. This is consistent with our belief that no single historical truth exists and that telling of history is incremental and partial.

The NASFAA staff, 2007.

With the preceding considerations in mind, we begin the narrative of NASFAA from 2006-2011. We view this work as what Thelin (2004) calls a horizontal history of higher education or the study of the "founding and influence of organizations and agencies that cut horizontally across the higher education landscape," (p. xxvii). The themes and events prominent during this organizational period are closely related to the broader landscape of higher education at the time, including public policies, governmental agencies, and philanthropic organizations. We interweave this background to bring into sharper relief the story of the association from 2006 to 2011.

Indeed, the history of the financial aid profession (and consequently NASFAA) is interwoven with the shifting landscape of higher education in the United States. The growth in federal aid programs in the 1960s and 1970s largely created the need for expert student aid administrators at institutions to monitor and manage the money and rules governing its use (Wilkinson, 2005). Similarly, political and economic shifts in the 1980s and 1990s saw the transition from federal grants to loans as a primary funding source for students (St. John, 2003). Moreover, as the last of the Baby Boom cohort passed through the U.S. higher education system, the specter of declining enrollments increased institutional anxiety. Competition for students increased, especially at the nation's elite and private institutions, leading to the inclusion of financial aid professionals in enrollment management efforts, whereby financial aid was seen as both a tool for market positioning and achieving institutional goals (Wilkinson, 2005).

This interweaving of the higher education landscape and the history of NASFAA is evident in prior histories of the association. Steven Brooks, in his work covering the period 1966 to 1985, charts the development of NASFAA alongside the historical landmarks of U.S. higher education: creation of the National Defense Student Loan program, creation of the Basic Educational Opportunity Grant, the 1980 reauthorization of the 1965 Higher Education Act. His work more paralleled the association's initial formation as a council, the establishment of its presence in Washington, and its ascendance to a role of influence in federal aid policy (Brooks, 1986). Similarly, Robert Huff's treatment of the period from 1986-1991, 1991-1996, 1996-2001, and 2001-2006 picked up where Brooks left off, noting the influence of federal legislation, lobbying efforts, and NASFAA's relationship with other associations. We continue our work in this vein with a consideration of the political and economic contexts at the time this story begins.

The Future of Higher Education and the Future of NASFAA

In February 2005, when leaders of the association, including the Executive Committee, the Association Governance and Membership Committee (AGMC), and representatives of the NASFAA membership gathered at a retreat to update and revise NASFAA's Strategic Long-Range Plan, they could not have known what lay ahead for the association. At the time, leaders prioritized what they believed were the most pressing challenges facing the association. These included reevaluating what NASFAA does, given an increasingly competitive environment; practicing effective advocacy for financial aid programs; reviewing limited resources both from a fiscal and human resource perspective; establishing a leadership pipeline to encourage and develop new leaders and firmly establish their commitment to the financial aid profession; keeping up with rapidly escalating changes in technology, student demographics, the economy, and job responsibilities of aid administrators; and reviewing succession plans for senior NASFAA staff positions (NASFAA, 2005).

In retrospect, these challenges seem almost pedestrian compared to the events that would unfold over the next few years—events that prompted several of the former leaders of the association interviewed for this project to list *survival* as NASFAA's greatest accomplishment from 2006-2011. In the span of these five years, the association responded to a high-profile investigation of preferred lending practices by then New York Attorney General Andrew Cuomo; the retirement of its long-time leader, Dr. Dallas Martin; the hiring and subsequent resignation of Dr. Philip Day; a crisis of public confidence; the hiring of its third president in four years, Justin Draeger; and a seemingly unending stream of changes in federal student aid policies and practices. Hindsight enables us to see that NASFAA confronted these extraordinary events in addition to those challenges listed in the association's 2006-2011 Strategic Long-Range Plan.

Attendees enjoy the Fiesta Reception at the NASFAA National Conference in San Antonio.

Critical to contextualizing the events taking place at NASFAA during 2006-11 is recalling the U.S. economic and political climate at the outset of this timeframe. By 2006, the job market was plummeting and the nation was heading toward "The Great Recession," generating mounting national public concern evidenced by the political rhetoric during and leading up to the 2008 presidential election. President Obama ran on a platform of change, both generally and with regard to postsecondary education. President Obama's political proposals for higher education focused on "access, affordability, research, economic development, and international competitiveness" (Levine, 2008) and often acknowledged the link between the availability of student financial aid and access to higher education (Jaschick, 2008).

By 2008, a contentious presidential election, downtrodden economy, dismal job market, and the recent exposure of numerous regulatory and financial scandals collectively generated a "perfect storm" of increased skepticism surrounding government and public entities. Numerous publications contextualize the diminished sense of public trust within the realm of higher education, as well as subsequent calls for accountability. In his 2009 report published by the Center for Higher Education Studies, Leveille describes the potential consequence of waning public trust in colleges and universities: "With distrust comes suspicion. And where there is suspicion, control and regulation enter the picture, accompanied by limitations on budgets, budgetary control language, and challenges to all current practices" (pg. 9). The report highlighted examples of increased regulatory reform as a consequence of the heightened distrust of higher education and called for greater accountability from institutions at the state-level (Leveille, 2009). Calls for accountability were certainly to have a direct impact on NASFAA during this turbulent period in its history.

A Few Bad Apples? The Cuomo Investigations

NASFAA faced a number of organizational challenges between 2006 and 2011, although none quite as pervasive as the student aid lending practices investigation summoned by New York Attorney General Andrew Cuomo. In January of 2007, Mr. Cuomo began his tenure as New York's Attorney General, replacing former Governor Eliot Spitzer. Shortly after his induction as Attorney General, Cuomo resumed a number of investigations lingering from the Spitzer administration, including an inquiry into student loan lending practices (Lederman, 2007d). On February 1, 2007, the New York Attorney General's office issued a press release announcing the launch of a public inquiry regarding student loan lending practices at more than 60 public and private universities across 18 states, as well as eight student aid lending organizations (New York Attorney General Office, February 1, 2007a). The press release noted that the Attorney General would be "requesting information pertaining to any financial arrangements the schools have with lenders that help the lenders get placed on the preferred lists, including records of compensation lenders have given in exchange for placement on the lists" (New York Attorney General Office, February 1, 2007a).

The subsequent investigations into student lending practices unveiled what Mr. Cuomo described as "an unholy alliance" between institutions of higher education, financial aid administrators, and student loan lenders, and the New York Attorney General's office shortly announced numerous allegations against both colleges and lenders (Zemsky, 2009, pg. 91; Redden, 2007; Lederman, 2007d; Guess, 2007; Heller, 2007). In March of 2007, the New York Attorney General's office announced that it intended to file suit against Education Finance Partners (EFP), revealing that EFP had established profit-sharing agreements with more than 60 colleges and universities by offering "kickbacks" to institutions that included EFP on their "preferred lender lists" (a list of lenders distributed to students receiving financial aid) (Redden, 2007; Lederman, 2007d; Zemsky, 2009). While EFP initially released a statement expressing "dismay" at the Attorney General's allegations (Education Finance Partners, 2007), by April the firm consented to a $2.5 million settlement with the Attorney General's office and agreed "to end revenue sharing agreements with universities" (New York Attorney General Office, 2007d; Guess, 2007).

The lawsuit against EFP, however, was only one in a long list of allegations against colleges and lending institutions and subsequent settlements (Zemsky, 2009; Jaschick, 2007, Redden, 2007; Lederman, 2007b, 2007d; Guess, 2007; Heller, 2007). Allegations directed at the financial aid and student lending industry included not only "kickbacks" to institutions in exchange for placing lenders on "preferred lender lists," but also allegations of lavish lender spending at NASFAA conferences and too-cozy relationships between financial aid officers and lending organizations (Golden & Armstrong, 2007). Further, the investigation revealed that some financial aid administrators received stock and/or consulting money from student loan organizations on their college's preferred lender list, most notably Student Loan Xpress, resulting in the permanent or temporary removal of at least three high-level financial aid administrators by April 2007 (Heller, 2007; Golden & Armstrong, 2007; Zemsky, 2009).

At several points during the investigation, Mr. Cuomo expanded the investigation to include additional colleges, banking organizations, and direct-to-student lender organizations (Heller, 2007; Giannone, 2007), and although a few colleges threatened to fight back against Mr. Cuomo's allegations (Lederman, 2007d), the majority of institutions agreed to settle with the New York Attorney General's office. In exchange for a termination of the investigation, universities, student loan companies, and other lender organizations offered financial settlement as well as the adoption of a "Code of Conduct" drafted by the Cuomo office (Guess, 2007). According to a New York Attorney General office press release, by June 14, 2007, 26 schools had adopted Cuomo's Code of Conduct (New York Attorney General Office, 2007e).

Mr. Cuomo's investigation led to financial settlements with numerous universities and lenders (Zemsky, 2009; Jaschick, 2007, Redden, 2007; Lederman, 2007b, 2007d; Guess, 2007; Heller, 2007); notably, a few settlement agreements, such as those with John Hopkins University and Fordham Universities, required colleges to pay back students directly in addition to fees paid the Attorney General's office (New York Attorney General Office, 2007e).

Questions remain surrounding the legitimacy of the financial aid investigations, the motivations that drove Mr. Cuomo's inquiries, and the prevalence of actual wrongdoing on the part of student financial aid administrators. As Doug Lederman of *Inside Higher Ed* noted, "supporters champion [the investigations] as having shined a light on sleazy practices… and ultimately helping students. Critics say it destroyed the careers of several financial aid officers and besmirched thousands of financial aid officers and lenders without ever proving that any individual student paid a penny more than he or she should have" (Lederman, 2008e). Even among NASFAA's institutional members there are divergent perspectives surrounding the investigations and the enduring impact of the controversy; some described the publicized offenses as an overblown projection of a few "bad apples," while others perceive the offenses as a product of relaxed industry standards and oversight.

It remains a matter of debate whether NASFAA acted improperly, and the extent to which it was responsible for the actions of its member institutions. Consider that, in 2007 NASFAA had over 3,000 institutional members, representing tens of thousands of individual financial aid administrators. The institutions that settled with Attorney General Cuomo represented less than 1 percent of the membership. There is little evidence of widespread or systematic abuse. Moreover, it remains unclear what role, if any, NASFAA played in encouraging or discouraging specific institutional actions. Nonetheless, media reports of lender sponsorship and the use of preferred lender lists gave the appearance of wrongdoing and complacency on the part of the association.

An area of criticism leveled at the association involved corporate sponsorship of conference events. In a clearly polemical story, *Higher Ed Watch* reported in 2007 that NASFAA accepted $20,000 from KeyBank to sponsor its opening conference session, $11,000 from OneSimpleLoan to sponsor the National Chairman reception, and $3,000 from Student Loan Xpress to sponsor a breakfast. Corporate sponsorship of conferences for professional associations is not uncommon and NASFAA had a longstanding practice of deriving portions of its annual revenue from lender sponsorship. For example, between 2008 and 2009, NASFAA's revenue from its national conference declined by nearly $500,000 following the agreement with Cuomo to limit lender sponsorship. Furthermore, consider that in 2004 the NASFAA board voted not to strengthen its code of conduct by limiting lender sponsorship to $50. This confluence of factors likely lent an air of credibility to Cuomo's charges. For example, the Association for Institutional Research listed over 40 corporate sponsors in its 2013 Annual Forum program guide. How NASFAA's reliance on sponsorship differed from other professional associations and the extent to which this may have affected students is, again, a matter of debate that suffers from a lack of evidence.

Inconclusive evidence, however, did not curtail the extent to which NASFAA's reputation suffered as a consequence of the investigations. The investigations transpired amid a great deal of controversy, as Mr. Cuomo partnered with the *Higher Ed Watch Blog* in a quite successful effort to gain attention from the national media (Heller, 2007). As student loans were already a popular topic due to rising interest rates and tuition costs, media outlets hastily ran stories about the investigation. Throughout March and April of 2007, numerous news organizations, including *The New York Times* and *The Wall Street Journal,* highlighted the investigations, many referring to the investigations as a "scandal" or "fiasco" (Armstrong & Golden, 2007; Associated Press, 2007; Dillon, 2007; Jaschick, 2007; Lewis, 2007).

Consequently, NASFAA was forced to confront not only the technical issues surrounding Mr. Cuomo's inquiries, but to simultaneously defend the financial aid profession as a whole. NASFAA President Dallas Martin acknowledged this issue immediately in a 2007 letter to Mr. Cuomo, wherein he warned that Mr. Cuomo had done "a great disservice" to financial aid administrators by encouraging parents to "mistrust the advice of financial aid administrators and schools" (Martin, 2007a). Dr. Martin's letter asked that Cuomo reconsider his tactics and instead spend time talking to financial aid administrators across the country. In an effort to curtail additional negative press, NASFAA distributed an internal guide that advised members to seek the help of their institutions' public affairs offices if asked to speak to the press, and to "condemn any unethical behavior between lenders and schools," to "place those few instances of unethical behavior in proper perspective," and to "further promote the ethical standards to which virtually all administrators adhere" (NASFAA, 2007b).

After months of deliberation, on May 31, 2007, NASFAA President Dallas Martin ultimately engaged Attorney General Andrew Cuomo in a public reconciliation in which Dr. Martin apologized for ethical violations of financial aid administrators, publically agreed to disallow lender sponsorship at NASFAA conferences, and agreed to allow representatives from the Attorney General's office to attend annual NASFAA conferences as a means to ensure compliance (Arenson, 2007; Lederman, 2007b). This move was met with varied levels of agreement from NASFAA administrators and membership, and led to a substantial revenue loss for the organization.

This was both a remarkable and a predictable change of position in some ways. Asked whether he was aware of a comparable example of the head of a major professional association apologizing and submitting to such extensive oversight by a governmental official, higher education expert and journalist Doug Lederman reflected, "I have to think about whether there's anything comparable. It's hard to imagine" (personal communication, 2013). Acknowledging NASFAA's difficult position, Dr. Martin told the NASFAA Board of Directors at their July 2007 meeting that, "inaction on NASFAA's part would have signaled to the Attorney General, members of Congress, and others that we did not care about the issue and that we supported the alleged actions of a few members." (NASFAA, 2007a). In the end, NASFAA appears to have had little choice but to yield to the legal and political pressures.

What more NASFAA could or should have done remains unclear. The association was more accustomed to engaging in political debates about federal legislation than defending its own practices. Indeed, the focus of the association has been on influencing national financial aid policy, helping to interpret national policy for its members, and supporting the professional development of its members. Perhaps more focus on ethics was necessary, but such a statement is easily made in hindsight and, as noted above, there is no evidence to suggest that ethical lapses were widespread.

In spite of what remains unknown about the investigation, NASFAA's ability to move beyond the obstacles associated with the controversy illustrates the resiliency that NASFAA and its members in the financial aid community demonstrated throughout 2007 and subsequent years. In his 2007 address at the annual NASFAA Conference, National Chair Michael J. Bennett discussed the impending Cuomo investigations. He implored his fellow financial aid professionals to "continue to define ourselves, as we always have, by our actions and dedication to the highest level of professional ethical standards" and to "keep the doors of education open as wide as we can" (Bennett, 2007, pg. 65).

The 2007 investigations initiated by New York Attorney General Andrew Cuomo, in conjunction with the coinciding student loan crisis, produced a flood of legislative and regulatory changes with regard to financial aid administration policy and practice. Two pieces of legislation directly tied to Mr. Cuomo's inquiries were The Student Lending Accountability, Transparency, and Enforcement Act (SLATE) and the Student Loan Sunshine Act, both enacted in 2007. Collectively, these pieces of legislation prohibited lenders from making gifts to college and university employees and tightened the regulations surrounding financial aid offices and student disclosure requirements. After its public apology, NASFAA strongly supported sunshine laws designed to create more transparency in the student lending industry.

The Higher Education Opportunity Act of 2008, a reauthorization of the Higher Education Act of 1965, also addressed policies and procedures surrounding financial aid lending practices. Although the modifications sanctioned by the Act affected a broad range of areas within the realm of higher education, "the debate and discussion surrounding the measure focused heavily on the rising prices of college and the increasing difficulty students and families have paying for a higher education" (Lederman, 2008a). The bill gave the Department of Education "significantly more authority to regulate private student loans" (Lederman, 2008a).

Retirement of a Long-time Leader

Whether the Cuomo investigation hastened Dr. Martin's retirement after 32 years is a matter of speculation. The investigation had taken its toll on the reputation of the profession and the association. However, it is reasonable to conclude that a confluence of factors contributed to Dr. Martin stepping down from the helm. As NASFAA commenced with its 2006-2011 Strategic Long-Range Plan in 2006, significant social, political, and economic changes in higher education were under way.

Dr. A. Dallas Martin retired as NASFAA president in December 2007, after 32 years.

Originally hired as a relatively new financial aid professional, Dr. Martin was described by his predecessor Mr. Richard Tombaugh as having "the right combination of financial aid expertise and political savvy" (personal communication, 2013). Described by one interviewee as a "rock star" of financial aid, Dr. Martin steered NASFAA from 1976 to 2007[1]. Dr. Martin's influence on and importance to NASFAA, as well as to the field of financial aid as a whole, is well established and well documented in prior histories of the association (e.g., Brooks, 1985). For example, Huff (1996) writes, "Seemingly without peer as the champion of talented students of limited financial resources, a legislative strategist and a model for his professional colleagues, it is too painful even to contemplate what might have happened without his dedicated and informed leadership," (p. 2). Dr. Martin is credited with shepherding NASFAA into organizational maturity, influencing federal financial aid legislation, and working tirelessly to ensure the most financially needy students were the recipients of federal programs.

Janet Dodson, 2006-07 NASFAA National Chair, greets Rep. Tim Bishop. (D-NY)

Shortly after Janet Dodson became 2006-2007 NASFAA National Chair, Dr. Martin informed Ms. Dodson of his intention to retire effective December 15, 2007 (Aasen, 2007); J. Dodson, personal communication, 2013). 1999-2000 National Chair Irvin Bodofsky noted, "The topic of Dr. Martin's retirement weighed heavily on each of the national chairs during the time I was an active member of the Board of Directors. Past chairs commented on their luck in 'dodging the bullet of Dr. Martin's retirement'" (personal communication, 2013). Yet the time had finally come for NASFAA to search for a new leader, a task that was perhaps especially important given the recent tarnishing of the profession's image in the national media.

The groundwork for succession planning had been laid years earlier, as members of the AGMC developed and refined the CEO Transition Plan under the leadership of the 2000-2001 National Chair, Rachael Lohman. Ms. Dodson charged AGMC to review and further refine the NASFAA CEO Transition Plan. The plan approved the use of a search firm to assist in conducting the search, as well as the appointment of a Presidential Search Committee (PSC). The PSC would be composed of no more than 11 members, to include a past national chair as chair; the 2006-2007 past national chair, chair, and chair elect; one representative from each of the six NASFAA regions; and a non-voting NASFAA staff member.

In July 2007, the NASFAA Board of Directors met ahead of the National Conference to review the CEO Transition Plan and prepare the job description for the new president. That same month, the board selected 1992-1993 National Chair Paul G. Aasen to serve as the chair of the PSC. Over the next two months, the members of the committee were screened and selected. The work of the committee began in earnest, and with good reason: NASFAA had set for itself the goal of filling the position by the end of the 2007 calendar year.

The steps taken in the search process were, in many ways, typical. NASFAA enlisted the help of executive search firm Korn/Ferry International (KFI); recruited, screened, vetted, and interviewed candidates; and hired a president. On December 20, 2007, NASFAA announced the selection of Dr. Philip R. Day, Jr. as its new president and CEO (NASFAA, 2007c). Had Dr. Day not resigned from NASFAA after 18 months amidst allegations of misdirecting public money during his tenure at City College in San Francisco, we can safely assume that the search process would not have received as much scrutiny as it did after the fact. However, after reports surrounding the allegations against Dr. Day surfaced in the media, questions arose with regard to the decision of NASFAA's hiring committee to select Dr. Day, despite the fact that allegations had already begun to surface at the time of his induction (Lederman, 2009). As journalist and filmmaker Billy Wilder once said, "Hindsight is always 20/20."

Upon Dr. Day's departure, the association's leadership engaged in the inevitable process of reflection and dialogue about whether something different could have been done to avoid the embarrassment for the association and for Dr. Day. After reviewing many primary and secondary documents and interviewing those involved with the hiring, including Dr. Day, it remains unclear whether any answer can be found to the seemingly simple question, "What happened?" We begin this chapter in NASFAA's history by describing the context in which Dr. Day was hired.

A New Leader for the Association

The *Higher Ed Watch* blog publically criticized Dr. Day's lack of expertise surrounding financial aid matters specifically (Burd, 2008). However, in an interview at the time, one NASFAA board member communicated that the committee that hired Day was not necessarily in search of a financial aid expert, but someone with the political savvy to "shake things up" and advocate on behalf of the organization (Lederman, 2009).

The real or perceived waning of NASFAA's influence in national financial aid policy discussions was an important part of the context in which Dr. Day was hired. At least two factors contributed to this perception: The tarnishing of NASFAA's image following the Cuomo investigation, and the waning influence of higher education professional associations in Washington, DC. The latter is attributable, in part, to the growing influence of philanthropic foundations in policymaking.

Philanthropic involvement in higher education is nothing new in the United States. As Curtis and Nash (1965) point out, institutions of higher education have received funding from philanthropic foundations since the establishment of America's oldest colleges and universities. However, in recent years scholars have called attention to an increase in the power and influence of large charitable organizations and a consequential change in the relationship dynamic between philanthropic foundational leadership, educational and political leadership, field scholars,

[1] Effective July 1, 1987 the executive secretary position was renamed president and included some changes in duties and responsibilities. See Huff (1996) for additional details.

and professional associations. For example, the Bill and Melinda Gates Foundation has been the subject of several articles recently published in the *Chronicle of Higher Education* that illustrate the ever-extending reach of philanthropic foundations within the field of postsecondary education (Gose, 2013; Parry, Field & Supiano, 2013). Asked about the shifting balance of influence in Washington, D.C., Doug Lederman responded, "I think the associations generally are in a lot weaker position than they were five, 10, and 20 years ago, being elbowed out by the foundations and by the think tanks to some extent" (personal communication, 2013). NASFAA was in need of a leader to help it restore its image and retake its influential position in shaping federal financial aid policy.

Philp R. Day, NASFAA President from December 2007 to July 2008.

It was against this backdrop that the NASFAA PSC conducted its search for someone to replace Dr. Martin. Critiques of Dr. Day for his lack of direct financial aid experience overlook the important fact that the presidential position description did not explicitly request prior experience in financial aid administration. It prioritized qualifications such as a strong record in and commitment to higher education, visionary leadership, the highest level of ethics and integrity, and success in the legislative arena, as a few examples. PSC Chair Paul Aasen suggested that there were two points of view with regard to the ideal candidate (personal communication, 2013). One perspective held that NASFAA needed someone like Dr. Martin again: someone who was a financial aid professional, had a deep background in aid administration, and knew the technical side of the field. Another perspective was that NASFAA's influence in federal financial aid policy was waning and that other professional associations were increasingly filling the void created in part by the retirement of Dr. Martin. From this viewpoint, NASFAA needed someone who could be brought up to speed quickly on the technical aspects of financial aid, but who, more importantly, had experience as a CEO and in working with Congress. The final pool of candidates for the job reflected these two positions, with some candidates having come up through the financial aid ranks, and others, like Dr. Day, who had institutional experience as well as some measure of gravitas in national higher education discussions.

The focus of the hindsight debate over the hiring of Dr. Day has been on what the PSC should or could have known about Dr. Day's brewing legal trouble in San Francisco. Moreover, questions remain regarding whether candidates were appropriately screened. Several possibilities should be considered with respect to why NASFAA hired Dr. Day when questions about his use of the City College of San Francisco's funds to support a facilities bond campaign were a matter of public record, first published in two articles in the *San Francisco Chronicle* in April 2007 (Williams, 2007a & b). First, there may have been a misunderstanding between the PSC and the Korn/Ferry International (KFI) search firm with regard to who held responsibility for vetting candidates. NASFAA retained KFI, one of the world's largest executive search firms, to help with candidate development, interviewing, report writing, checking references, verifying education, and negotiating compensation. According to the terms of NASFAA's agreement with KFI, the PSC would serve as a partner in these activities, with responsibility for hiring ultimately resting with the PSC. From the perspective of several PSC members interviewed for this history, responsibility for screening the candidates rested with KFI. Paul Aasen reflected, "[T]here was a certain level of trust and faith put in the search firm and perhaps while that may have been well-placed, perhaps there were different expectations about how well the firm would vet candidates" (personal communication, 2013). Confusion about responsibilities for vetting candidates could have led to inadequate pre-hiring screening.

Second, it is possible that given the information available at the time, the PSC made the best decision it could. In its April 6, 2007, front-page article on the diversion of funds, the *San Francisco Chronicle* did not directly implicate Dr. Day. Instead, the story focused on then Assistant Vice Chancellor James Blomquist, who admitted to steering into the bond campaign funds a $10,000 rent payment from a motorcycle driving school that used the college's parking lot on weekends. Dr. Blomquist did not acknowledge any wrongdoing in the story, however. The story details several other donations made by firms negotiating contracts with the college. However, it goes on to note that Dr. Day, after he learned of the bond campaign donation, ordered it be refunded to the motorcycle school in an effort to avoid the appearance of impropriety. In subsequent articles in the *San Francisco Chronicle,* Dr. Day reiterated that nothing improper had occurred. On April 18, 2007, the *San Francisco Chronicle* reported that the City College Board of Trustees had allocated funds to launch an internal probe related to the allegations. The request to launch the probe came from Dr. Day and Dr. Anita Grier, then president of the board of City College. The *San Francisco Chronicle* ran a handful of additional articles on the matter between April and August 2007. Although each article mentioned Dr. Day, it is difficult to discern his role in the use of college funds.

By the time the PSC interviewed candidates in November 2007, two official and one internal probe had been conducted in California. According to several PSC members interviewed for this project, by the time they met with Dr. Day, search committee members who may have been aware of the concerns in California thought the matter had been settled. Indeed, Dr. Day believed exactly that. When interviewed, Dr. Day said, "If I had thought for a moment that this thing would have ended up playing its way out in the summer of 2009 the way it did, I would never have applied for the job" (personal communication, 2013). Charles Ingersoll, the principal consultant from KFI, corroborates this perspective. In a 2009 article in *Inside Higher Ed,* Ingersoll notes, "Unless you have facts that someone was involved, you have to take it for what it is worth at the time" (Lederman, 2009). Given the absence of clear evidence that Day had committed a crime and with the information it had, the PSC may have made the best decision it could.

A third possibility is that the PSC was not fully aware of the questions in California when it narrowed its pool of candidates because KFI did not bring it to their attention. A background check is standard in any executive search, and KFI was tasked with conducting such a check on the finalists. However, perhaps given the aggressive timeline and the pressure to find a viable leader, the reports of potential wrongdoing in California were minimized by KFI and not shared with the PSC. During a mid-October 2007 conference call, members of the PSC discussed a status report from KFI that expressed its slight concern about the small number of viable applicants for the position. At the urging of the PSC, the search continued on its original schedule. On October 31, 2007, KFI's Charles Ingersoll gave a positive report about the search to the PSC, along with a new list of applicants. However, there is relatively little evidence to determine what KFI was aware of, and to what extent it had vetted the candidates. When asked about background issues pertaining to both finalists, KFI informed NASFAA that there were no significant issues of concern related to any of the finalists (Lederman, 2009). The association therefore moved forward with its decision in good faith based upon the information received from the search firm. NASFAA's statement following the resignation of Dr. Day seems to suggest that perhaps the PSC was not fully aware of the allegations.

Regardless, Dr. Day's term as NASFAA president and CEO came to an abrupt halt after a grand jury indicted him for misuse of public funds. In July 2009, just 18 months after Dr. Day accepted the NASFAA presidency; investigators raided Day's former office at City College, as well as the offices of several other City College administrators, in an effort to find evidence of misuse of public funds (Williams, 2009). At the start of the investigation, Dr. Day claimed no wrongdoing and immediately took unpaid administrative leave from NASFAA in an effort to defend himself against the allegations (Supiano, 2009). Dr. Day formally resigned from his position at NASFAA in July of 2009 (Supiano, 2009), and eventually plead guilty to the misuse of $100,000 in public money. Although Dr. Day served no jail time, he agreed to pay restitution to City College as well as a $30,000 fine (Rice, 2011). Upon Dr. Day's resignation, Executive Vice-President Joan Holland Crissman assumed the position of interim president of NASFAA, to be discussed later in this history.

The National Conversation Initiative

Although the unexpected resignation of Dr. Day may have overshadowed its conclusion, in summer 2008, NASFAA launched what it called a National Conversation Initiative (NCI), "a nationwide conversation on college access and aid, to awaken a national commitment" to address the persistent and growing disparities in postsecondary participation among low- and moderate-income students. According to Dr. Day, NCI "was all about staking out a higher ground of engagement for the association…" and providing the Obama Administration with an array of recommendations around access in its first 100 days in office (personal communication 2013). In addition, the NCI was meant to build a sense of consensus and engagement within NASFAA following a number of difficult years. Dr. Day described it as putting "the emphasis on the future as opposed to being hung up about the past, which was characterized by the Cuomo scandal" (personal communication, 2013). The NCI was designed to serve as a vehicle for healing the association as well as a forum for debating the direction of federal financial aid policy. Dr. Day intended the NCI to "help [NASFAA] develop a better sense of organizational self, who we are, what we represent, who we serve, and how critically important that is within the broader fine work of issues regarding access, and equity, and post-secondary education," (personal communication, 2013).

NCI

NASFAA
National Conversation Initiative
Access and Aid for Student Success in Postsecondary Education

NASFAA hosted 18 region- and state-based town hall style listening sessions with more than 5,000 members participating. Questions for debate focused on access, simplification, loans, grants, tax policy, and more. In addition, the association held hearings with national financial aid experts and policymakers from the legislative and executive branches of the federal government, and compiled findings from more than 40 financial aid studies. NASFAA synthesized the information and compiled it into a final report released on April 22, 2009, and sent its recommendations to the Obama Administration. The report included 11 preliminary recommendations, including simplifying the student aid application process; reducing student confusion and administrative burden; expanding and simplifying grants; creating grants for graduate students in high need areas; improving predictability and portability of aid; consolidating federal loan programs into a single program; shifting loan subsidies from in-school to when a student entered repayment; encouraging planning and saving; enhancing tax benefits; increasing awareness of financial aid options; and improving campus-based aid programs.

The lasting impact of the NCI on NASFAA as well as federal policy can be debated. Some recommendations made in NCI were implemented; for example, the recommendation to simplify the aid process found its way into federal legislation, primarily through efforts aimed at streamlining the FAFSA. Yet, NASFAA's recommendations were part of a broader policy stream in which consensus was forming around the need for certain changes in financial aid. Nonetheless, it is hard to imagine that its voice as the representative of the profession did not carry some weight in the policy making process. Unfortunately, the unexpected resignation of Dr. Day just a few months after the release of the report likely blunted the impact of NCI on NASFAA and financial aid policy. Still, the NCI would affect NASFAA's organizational future in an unintended way, by serving as a platform for Justin Draeger, then-vice president of public policy and advocacy, to engage the NASFAA membership on a national level.

Effective Interim Leadership

Shortly after Dr. Day's resignation in July 2009, NASFAA's Executive Vice President Joan Holland Crissman, who had formerly served as interim president in 2008 after the retirement of Dr. Dallas Martin, once again assumed the role of interim president and CEO of the organization. Ms. Crissman, a NASFAA staff member for over 30 years, played a pivotal role in keeping the association afloat throughout some of NASFAA's most tumultuous periods. Notably, not only did Ms. Crissman keep the organization functioning after the resignation of Dr. Day, in a letter to the NASFAA membership she resolved that despite the unsettling events that led to her appointment as interim president and CEO, advocacy and training efforts would go on "unhindered" (NASFAA, 2009a). Ms. Crissman fulfilled that promise successfully.

Indeed, the fact that NASFAA managed both to survive and thrive during the aftermath of the Cuomo investigations and Dr. Day's resignation are undoubtedly due, at least in part, to Ms. Crissman's management of NASFAA and dedication to the organization during her role as interim president. As former NASFAA National Chair Michael Bennett explained, Ms. Crissman served as a "stabilizing force" for NASFAA during its most difficult year; "working tirelessly with staff during Dallas' departure, serving as interim president, and onboarding Dr. Phil Day" (personal communication, 2013).

Former NASFAA Executive Vice President and Interim President, Joan Holland Crissman

The NASFAA Board of Directors voted at its November 2009 meeting to establish a search committee to begin once again the process of selecting a new president and CEO. Evidence, both anecdotal and recorded, reveals that the 2009 NASFAA Presidential Search Committee made performing a transparent hiring process one of its primary goals. In 2009, the committee voted on and implemented several procedural changes to increase transparency; granted administrative voting power on the selection committee to an elected member of the Board of Directors (in the previous PSC, the Board of Directors member of the committee held no voting power); made public the names of those in the final round group of candidates prior to the selection of an individual; and updated the job description for the president and CEO to better suit organizational needs (NASFAA, 2009b). The committee also added a second staff member who could vote. Further, each of the three final candidates interviewed with the entire Board of Directors in April 2010 (NASFAA, 2010a).

In May 2010, after a six-month search process, NASFAA named Mr. Justin Draeger its new president and CEO (NASFAA, 2010b; Supiano, 2010). The committee felt that Mr. Draeger, an internal candidate and former vice president for public policy and advocacy for the organization, possessed the "ability to bring consensus and agreement to disparate groups" (Supiano, 2010) and offered a background in financial aid regulatory and legislative issues as a former director of financial aid and regulatory analyst (J. Draeger, personal communication, 2013). As outlined in NASFAA's 2010 CEO Transition Plan, Ms. Joan Crissman played a significant role in "onboarding" President Draeger.

During this period, NASFAA addressed other elements of its leadership configuration. Following the turbulence of the Cuomo investigation and rapid succession of presidents, it is not surprising that NASFAA's leadership began to examine the structure and role of its Board of Directors as well as the board's relationship to the organization's staff. Past board members, when interviewed for this project, wondered whether the board might have played a stronger role in the events that shook NASFAA during this period. Other concerns included the size of the board (too big or too small), the relatively short terms served by board members (two years in most cases), and whether higher education sector should play a role in board representation.

At its July 2009 Board of Directors' meeting in Denver, 2008-2009 National Chair Dave Gruen raised the issue of board restructuring. He proposed altering board membership to include representatives-at-large from each sector of higher education. This, coupled with an interest by Draeger in strengthening the board for the long-term benefit of the association, provided the necessary foundation to make lasting changes to the board.

In 2010, NASFAA took its first concrete steps that evolved into a significant restructuring of the board. 2010-2011 National Chair Laurie Wolf tasked the AGMC with researching the size and composition of other non-profit boards of directors. The committee found that NASFAA's board had significantly more members than other higher education and non-profit professional associations. Boards of associations examined by NASFAA averaged 25 members whereas NASFAA's board had 33 members. In an October 2010 meeting, the board discussed some of the consequences associated with a too-large board. These included increased organizational costs (NASFAA pays travel, hotel accommodations, and dining costs for three association meetings per year), barriers to meaningful oversight and participation of all board members, and an increased likelihood to "rubber stamp" committee and staff suggestions (NASFAA, 2011a). Ultimately, the association voted to slowly transition the size of NASFAA's Board of Directors from 33 to 21 members. Under the plan, the board would reduce the number of representatives-at-large and regional representatives each year over the course of four years. Following the transition period, NASFAA's Board of Directors would comprise: one national chair, one chair-elect, and one immediate past national chair, six representatives-at-large, six regional representatives, three commission directors (optional), and the president, treasurer, and secretary of the association (NASFAA, 2012b).

2010-11 NASFAA National Chair, Laurie Wolf

The board also implemented additional changes that sought to increase its overall effectiveness. An immediate noticeable change was in the president's communication with the board. Draeger moved to a weekly reporting structure, with detailed monthly dashboards and a comprehensive annual report (Board of Director Meeting Minutes, July 2010b).

A Shifting Field of Practice

The field of financial aid administration endured a trying time from 2006 to 2008. Between the recession, the student lending crunch, and the investigations led by Attorney General Andrew Cuomo, NASFAA's members had overcome quite a few considerable obstacles. By 2008, as an outcome of the challenges faced by financial aid administrators, student aid as a profession began to lean toward increased regulation and standardization with regard to student aid lending policy and financial aid administrator conduct. Further, simplification and transparency were prioritized as crucial in building public trust, as evidenced by a number of initiatives carried out by NASFAA, the U.S. Department of Education (ED), colleges and universities, and various student rights advocacy groups. Advancement toward increased simplification led by ED included the 2007 announcement of the new FAFSA EZ form, which ED released in an effort to simplify the FAFSA submission process, as well as the creation and dissemination of multiple resources aimed to help students and families to better understand the language and principles surrounding financial aid.

With the Higher Education Opportunity Act of 2008 came the idea of standardizing financial aid award letters, the document that all potential student borrowers receive prior to officially accepting financial aid. In 2011, ED and the Consumer Financial Protection Bureau launched the College Affordability and Accessibility Center, an initiative aimed at "creating a model financial aid disclosure system" that better prepares students and families for making informed financial decisions about paying for college. As an element of the work of that partnership, an online "Financial Aid Shopping Sheet" was developed as a means to allow students to compare the accurate, all-inclusive institutional costs (United States Department of Education, 2011).

New Federal Grant Programs

Two new federal grant programs began in 2006: the Academic Competitiveness Grant (ACG) and the National SMART Grant. These need-based grants "were enacted to meet the growing need for improved math and science instruction" (U.S. Department of Education, 2006). These incentive-based grant programs received a mixed reception from higher education administrators; while some argued that the introduction of higher standards would increase academic performance, others worried that competitiveness grants "create more hoops for students to jump through" (Capriccioso, 2006).

The House and the Senate debated several versions of the DREAM Act between 2006 and 2011. The Act, first introduced in 2001, would allow immigrants students who meet certain criteria the opportunity to attend U.S. institutions of higher education, and would allow those students to qualify for permanent residency post-graduation NASFAA has and continues to play an instrumental role in advocating for the DREAM Act, and joined the American Council on Education in advocating for the Act as "an important tool for achieving our national goal of returning the United States to world leadership in higher education attainment" (Broad, 2010; Draeger, 2010b).

Federal Pell Grant Funding

NASFAA dedicated a significant portion of its advocacy efforts to supporting funding for the Federal Pell Grant Program. While the program's funding levels and student allocations remained level or increased throughout the timeframe, despite decreases to other financial aid programs, Pell funding remained an often-debated topic between 2006 and 2011, and Pell endured many programmatic changes during the period. In particular, in 2007, the College Cost Reduction and Access Act (CCRAA) implemented funding changes to the Federal Pell Grant Program (NASFAA, 2007d)

According to the April 2011 NASFAA Advocacy Update, NASFAA spearheaded a successful campaign to defeat a proposal to cut funding for 2011-12 Federal Pell Grant awards. The Republican-controlled House proposed to cut the maximum award by as much as $845, but the bill was defeated in the Senate. On April 14, Congress approved a bill that maintained the maximum Pell Grant at $5,550 for the 2011-12 academic year and delayed elimination of the year-round Pell to allow second awards for summer 2011 (NASFAA, 2011d).

Changes at the Department of Education and Its Relationship with NASFAA

Congress passed three important pieces of financial aid legislation— the CCRAA, the Higher Education Opportunity Act (2008 Reauthorization), and the Ensuring Continued Access to Student Loans Act extension—all within a two-year window between 2007 and 2008. Collectively, these pieces of legislation modified gainful employment rules, regulated the use of Title IV funding in dozens of ways, and implemented significant changes to the field of financial aid administration. These significant changes, in conjunction with the fallout following Cuomo's lender investigations and the recent "loan wars," which yielded the shift from institutional choice between Federal Family Education Loans and Direct Loans to 100 percent use of Direct Loans, spawned dozens of new regulations, requirements, and disclosures for financial aid administrators over an incredibly brief timeframe. Further, newly implemented changes and increased regulatory burden led to a period of strained relationships between NASFAA and ED officials. Although there is little tangible evidence of the weakened ties between the two groups, anecdotal accounts point to the mid-2000s as a period of tension between the two organizations.

Letters between the two organizations suggest that the strained relationship may have been instigated by the ED's decision in May 2007 to abruptly cancel its plans to send federal employees to present and provide training at the July 2007 NASFAA Conference. The decision, which led to numerous messages back and forth between Dr. Dallas Martin and various Department of Education officials, culminated in a letter sent from Dr. Martin to Secretary Margaret Spellings expressing his "sincere disappointment" with the Department's actions (Letter to Spellings, May 22, 2007).

A review of NASFAA's internal documents indicates several instances in which the organization explicitly discussed goals to restore its relationship with the ED. During Dr. Day's tenure as NASFAA's president, he noted during an address to the Board of Directors that a major task of the board was to "reconnect with state aid associations and rebuild relations" as well as "develop strategies for cooperating with the Department of Education on federal issues" (NASFAA, 2008a).

Interviews with NASFAA staff reveal sentiments of frustration as ED seemed at some points throughout the timeframe to bypass NASFAA during critical decision-making processes regarding areas of financial aid administration.

Evidence of NASFAA's concerns surrounding the relationship between ED and financial aid advocacy groups appear in a 2008 document titled "Transition Priorities." In this document, NASFAA's recommendations for the new presidential administration include the designation of a high-ranking member of the administration to meet with higher education officials surrounding legislative and program issues, as well as ensuring that "individuals from higher education associations are represented during negotiated rulemaking sessions" (NASFAA 2008b). In recent years, NASFAA's relationship with the Department of Education has improved markedly.

Technology and the Profession

As in many professions, innovations in technology have had a dramatic impact on the field of financial aid administration. New technology and software have radically changed the way financial aid awards have been processed, calculated, and administered over the past 10 years. While in many ways these changes have improved the process through standardization, they have also required those in the profession to develop a great deal of technical knowledge. At one time, financial aid administrators focused primarily on counseling and guidance to students; however, standardization and automation of some procedures have lessened the emphasis on these aspects of financial aid administration work. Many NASFAA administrators interviewed for this history perceive this to be the most pronounced change in the field in the past 20 years.

During the mid-2000s, numerous scholars called attention to the growing role of technology and its potential impact on the field of financial aid administration. In 2007, the authors of an Educause Research Bulletin (Cornell, Evans, Hallenback, & Sinsabaugh, 2007) recommended that financial aid administrators actively pursue opportunities in which they are able to utilize technology to advance the efficiency and effectiveness of student aid administration. The bulletin pointed out that "the role of automation in the financial aid office is paramount to the enrollment management strategies of the institution." The authors warned that emerging federal financial aid programs (Quality Assurance Program, Late Stage Delinquency Assistance project among the few) "may require IT to assist with system workarounds and modifications" and "contending with these and other external forces will necessitate further IT adaptations to the ever more complex realities of financial aid" (Cornell, Evans, Hallenback, & Sinsabaugh, 2007).

Two potential benefits related to the increased use of technology in higher education between 2006 and 2011 were advances that increased the ability of financial aid offices to streamline and automate services. For example, a 2009 article in the *Chronicle of Higher Education* features the Chancellor of the Connecticut Community College System, who "created a bureau in the system office that took many of the routine tasks out of the individual aid offices" as a result of new technology that would allow the college system to streamline routine tasks (Supiano, 2009). This bureau was said to be of particular benefit because it allowed financial aid administrators to focus on counseling students (Supiano, 2009).

Mindy Eline and Roland Zizer demonstrate NASFAA.org at the 2008 National Conference.

Advances in technology enhanced the capabilities of both NASFAA and ED in disseminating timely and relevant information to students regarding financial aid policy. For example, through the development and increased use of NASFAA's AskRegs Knowledgebase, a database of compliance and regulatory questions related to financial aid administration, association members could find on-demand answers to specific regulatory information.

NASFAA members and others also received information and training through "anytime, anywhere" education opportunities and webinars on current issues. NASFAA greatly increased its use of webinars for training and professional development purposes between 2010 and 2012 in an effort to reach a larger number of student aid professionals. According to NASFAA's 2011 Annual Impact Report, student financial aid professionals were satisfied with the online webinar options; in 2011, NASFAA provided webinar services for 6,840 total registrants with an average satisfaction level of 94.7% (NASFAA, 2012c).

Internally, NASFAA's Technology Initiatives Committee reviewed the organization's hardware, software, and web service functions in 2005, and reported that the organization's management of electronic services had reached the point where it would no longer be cost effective to "piece together [electronic] systems to respond to critical business needs" (NASFAA, 2005b). NASFAA responded to this finding by developing the e-Solutions project, a comprehensive three-phase plan developed to overhaul essentially all electronic functions of the organization, including NASFAA's web presence, membership database, and electronic communication with members. On November 14, 2005, NASFAA's Board of Directors unanimously approved the reallocation of up to $1,008,000 from the general Equipment/Systems Enhancement Fund to the e-Solutions project (NASFAA, 2005b). The Board of Directors initially gave the project enthusiastic support (NASFAA, 2005c).

During the early stages of the project, NASFAA hired an external agency, Evans Consulting Group, to help manage the implementation of the e-Solutions project. In its initial project plan, Evans estimated that the three phases of the project would take approximately two years to fully implement (Evans Consulting Group, 2005). However, leadership turnover and other setbacks derailed the implementation of the project. By 2007, when Dr. Day assumed the position of president and CEO, the e-Solutions project had not moved beyond Phase I of implementation. Under Dr. Day's leadership, the Evans Consulting Group was replaced by a new external consulting group that specialized in technology development, the Development Institute.

Initially, the Development Institute seemed to have made some progress in completing Phase I of e-Solutions. However, according to its final report to NASFAA, by April 2008 the "components were not on schedule, project management had to be replaced, and launch dates were postponed indefinitely" (Development Institute, 2009). By the time the contract ended with Development Institute the organization was continuing to implement pieces of Phase I and II, and NASFAA maintained internal management of the e-Solutions project. The project was eventually completed in December 2010 with the re-launch of the fully integrated, searchable NASFAA.org on a brand new content management system, under the direction of internal staff and in coordination with outside web developers.

Rebuilding the Association

By the time Mr. Draeger was named president and CEO of NASFAA in 2010, the association was concurrently recovering from previous organizational setbacks and addressing a round of new regulatory and legislative issues. During the first 90 days of Mr. Draeger's presidency, NASFAA hosted its 2010 National Conference, provided advocacy and support for issues related to Federal Pell Grant funding, Federal Perkins Loans, cohort default rates, and the DREAM Act, and started to roll out new training opportunities for NASFAA members (NASFAA, 2010d).

NASFAA President Justin Draeger (L) and Managing Director of Policy & Federal Relations Megan McClean with DREAM Act student advocates at the 2011 Conference in Boston.

Under Mr. Draeger's direction, in 2010 NASFAA began to address more pointedly several issues that pertained specifically to NASFAA membership and financial aid administrators. A mounting concern among NASFAA members was the heavy administrative and regulatory burden on financial aid offices. A 2010 NASFAA membership survey revealed that a majority of financial aid offices faced resource shortages that were "not short-term situations, but permanent structural problems," and these resource shortages were rapidly decreasing the ability of many financial aid offices to provide face-to face counseling and one-on-one student outreach (NASFAA, 2012c). Throughout 2010 and following years, NASFAA devoted a great deal of its advocacy efforts toward reducing the administrative burden imposed on financial aid offices. In a May 20, 2011 letter to U.S. Secretary of Education Arne Duncan, Mr. Draeger called for increased streamlining of the financial aid administration process, maintaining that one of the "most pressing issues is the regulatory and administrative burden faced by student financial aid administrators" (Draeger, 2011).

Negotiated rulemaking on changes to gainful employment regulations proposed by ED officials presented another high-priority issue during the early days of Mr. Draeger's presidency. In July 2010, ED released a *Federal Register* outlining proposals for the implementation of new metrics regarding the regulation of gainful employment (Epstein, 2010). Although gainful employment regulations sought to address issues at private colleges and universities, as Mr. Draeger noted in a 2010 NASFAA Board of Directors' meeting, the changes would affect all schools with non-degree programs (NASFAA, 2010b). In testimony given in November 2010, Mr. Draeger urged ED to consider the impact of the regulations on public and nonprofit institutions (Draeger, 2010).

Shortly after assuming the role of president, Mr. Draeger organized a weekend-long Strategic Planning Retreat in which the NASFAA staff "assessed departmental and organizational strengths, weaknesses, opportunities and threats; performed a comprehensive review of NASFAA's products and services, and defined organizational performance measures" (NASFAA, 2011b).

Identified as a major goal at the Strategic Planning Retreat was the need for the association to "actively initiate and engage in organized policy discussions and debates across many stakeholders" (NASFAA, 2011b). NASFAA made substantial improvement toward this goal throughout 2011 and 2012. In 2011, NASFAA hosted its first Orientation on Student Aid, a half-day program on Capitol Hill that provided congressional staff with an "overview of student aid programs and their respective histories" (via the National Student Aid Profile publication) and educated them about how changes to financial aid administration may affect students and families (NASFAA, 2012c). In January 2012, NASFAA also hosted its first open forum—The State of College Access—which "featured two panel discussions on the role of the Federal Pell Grant in college access and persistence" and was attended by many congressional staff members and Higher Education advocacy group members (NASFAA, 2012). Further, through its Legislative & Leadership Pipeline program, NASFAA hosted student aid leaders from across the United States and provided opportunities for them to participate in negotiated rulemaking sessions and advocacy meetings.

In addition to efforts targeted specifically at lawmakers on Capitol Hill, NASFAA sought to enhance its reputation and influence in the media. NASFAA staff developed a communications dashboard tracking media requests and mentions, and by 2011, Mr. Draeger reported to the board that both requests and mentions were on the rise (Board of Directors' Meeting Minutes, November 2011). In 2011, NASFAA also utilized Facebook to disseminate information about the "Save Student Aid Campaign" to oppose Pell Grant cuts in the 2012 Federal Budget (NASFAA, 2012). By 2012, the association actively engaged members using Facebook, Twitter, and LinkedIn.

Through these and other efforts, NASFAA made great strides in reestablishing its reputation among Washington associations for reliable financial aid policy guidance and expertise. Not only has this progress allowed the association to enhance its advocacy efforts, it has also helped foster a more collaborative relationship between NASFAA and ED. In a 2012 letter to NASFAA membership, Mr. Draeger reported that "NASFAA was at the table on critical policy discussions pertaining to Pell Grant funding, potential cuts to key campus based programs, award letters and consumer notifications, student loan debt, and the DREAM Act" (NASFAA, 2012c).

NASFAA's new programs and initiatives helped strengthen external aspects of the organization and increased engagement and motivation among NASFAA staff and members during the period. At the May 2012 Board of Directors' Meeting, National Chair Pam Fowler expressed "gratitude to the board for their level of engagement this last year and for providing timely feedback on policy and other NASFAA issues" (NASFAA, 2012a).

As part of the Strategic Planning Retreat, NASFAA staff identified and discussed the need to provide comprehensive, multi-faceted training to its members. Consequently, NASFAA established "NASFAA University." NASFAA established the program, rolled out to NASFAA membership in 2012, as a means to provide comprehensive training to NASFAA members and to offer a "nationally recognized, consistent, and rigorous program of education in administering the Title IV student financial aid programs" (NASFAA, 2012c). Participants in the NASFAA University program have the option to select one of five paths to a credential: self-study materials, online instructor-led courses, boot camps, on-site training, and demonstration of significant professional experience. After completing at least one of the five training paths, financial aid professionals may complete examinations to earn nationally recognized student aid credentials. NASFAA also developed several other initiatives to increase training available to NASFAA members (see Appendix of Initiatives: NASFAA Training Track, AskRegs Knowledgebase, and Webinars).

Current NASFAA President Justin Draeger, addressing Conference attendees in 2010.

In his 2010 interview for the position of NASFAA president and CEO, Mr. Draeger told the Board of Directors that, if selected, he would be "far more transparent with the fiscal health and the financial goals and objectives of the association" and "establish a clear path for the future" (NASFAA Board of Directors' Meeting

Minutes, April 2010). Mr. Draeger arguably has both accomplished and exceeded these goals. Draeger's colleagues, such as Barry Simmons, David Gelinas, and Donald Heller, characterize his tenure as president and CEO of NASFAA as a period of renewal and reinvention for the organization (personal communications, 2013).

Forging Ahead

When reflecting on the recent history of NASFAA, it is tempting to conclude in hindsight that it is a narrative of triumph over adversity. Crisis and adaptation are striking themes during this period. The leadership transitions, ethics investigation, revenue challenges, and loss of public legitimacy posed organizational challenges. However, by some indicators NASFAA regained lost ground and renewed itself as an organization during the end of this period. For example, by 2012, the association demonstrated steady improvements in total revenue support and organizational assets (McGladrey & Pullen LLC, 2012) and had begun to connect and train its members and the public using new technology and training methods, with positive reception (NASFAA, 2012c).

Nonetheless, it is important to remember the degree of uncertainty about NASFAA's future held by many of the association's leaders during this period. Rather than a sequential series of setbacks with inevitable progress, this period may be better conceptualized as a complex milieu with many possible outcomes. Here, the notion of the *butterfly effect* may be apt, wherein small events (e.g., a butterfly flapping its wings in Hong Kong) can have unintended, unanticipated, and disproportionate effects (e.g., a hurricane forms in the Gulf of Mexico). In reflecting on the events of this period, seemingly minor occurrences (e.g., the 2004 board vote not to approve guidelines on "lender inducements") combined with other factors (e.g., Andrew Cuomo's professional and political aspirations) resulted in large and unforeseen outcomes (e.g., Dr. Martin meeting with Mr. Cuomo to publicly apologize). In other words, the outcomes we observe now for NASFAA were not necessarily foregone conclusions. Progress and adaptation were not inevitable.

Standing room only at an interest session at the 2010 NASFAA Conference.

That said, NASFAA's state as an association in 2011 did not result from mere happenstance. Structural forces at play during this period (such as NASFAA's mission, the investment of members, the federal policy context, etc.) undoubtedly influenced the direction of historic events recounted here. The question remains: How did NASFAA manage to not only survive this period of uncertainty, but also to so swiftly recover its losses, and by 2012, to forge straight ahead into extraordinary organizational improvement?

A possible answer is that despite setbacks that NASFAA faced during 2006-2011, the association benefited in many ways from the significant changes in the field of financial aid administration. With a host of new regulations and substantial legislative changes to key programs, NASFAA's expertise, guidance, and advocacy efforts became more essential than ever before. Mr. Draeger characterized NASFAA's progress as "a testament" to the significant role of the organization, which is the reason it has "not only survived but thrived" (personal communication, 2013). These external forces may have offered the association the necessary vehicle to focus its efforts and its mission, which in turn enabled it to rebuild membership, stabilize revenues, and reassert itself amid the higher education lobbying groups in Washington. Under Mr. Draeger's direction, NASFAA has been successful in heralding the association's specialized expertise, which has driven NASFAA back into the media spotlight, this time on the association's terms. Recent efforts have generated visible forward momentum, and the association's ability to leverage its expertise and success has once again earned the organization its place at the table of financial aid policy and advocacy efforts.

Appendix: Major NASFAA Initiatives Introduced from 2006-11

AskRegs Knowledgebase

The AskRegs Knowledgebase is a database of compliance and regulatory questions related to financial aid administration. Users have the ability to browse or search via keyword for specific questions related to student aid administration. If a user has a question that has not yet been addressed in the AskRegs database, he or she may simply submit the question via a "ticket," prompting NASFAA staff to research and respond to the question. When NASFAA staff members answer a new question, they upload the information to the AskRegs database for access by other users. Users also have the opportunity to subscribe to specific topics to receive instant updates about regulatory and compliance changes. The AskRegs database is a valuable tool for student aid administrators with specific questions surrounding compliance and regulatory guidelines and is widely utilized by NASFAA members. NASFAA handled a total of 3,029 AskRegs inquiries in 2011 (NASFAA, 2012c)

Webinar Expansion

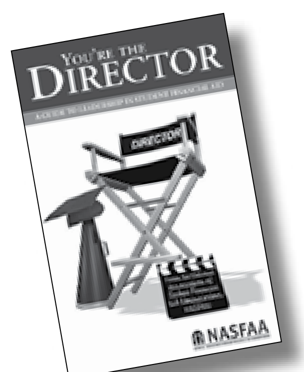
NASFAA greatly increased its use of on-demand webinars for training and professional development purposes between 2010 and 2012. According to NASFAA's 2011 Annual Impact Report, student aid professionals have been quite satisfied with the online webinar options. In 2011, NASFAA presented webinars for 6,840 total registrants (more than one individual can participate under each registration) with an average satisfaction level of 94.7 percent. Webinars addressed specific topics pertinent to financial aid procedural issues, such as verification, reviewing educational programs for Title IV eligibility, default prevention strategies, among others) (NASFAA, 2012c.)

NASFAA University

NASFAA developed NASFAA University in 2011 as a means to provide both comprehensive training to NASFAA members and the opportunity for financial aid professionals to earn credentials recognizing their knowledge and experience in financial aid administration. The program offers five methods of financial aid training: self-study materials, online instructor-led courses, boot camps, on-site training, and demonstration of significant professional experience. After completing at least one of the five training requirements, financial aid professionals are given the opportunity to test for nationally recognized student aid credentials. NASFAA based the training on its pre-existing CORE training program materials (NASFAA, 2012c).

Training Track

In 2011, NASFAA developed its Training Track program as a means to connect schools with NASFAA training staff and provide aid administrators in the field with appropriate regulatory and compliance resources. Under this program, a NASFAA trainer provides training sessions at state and regional student financial aid association conferences on a variety of regulatory issues (NASFAA, 2011). The Training Track is critical for remote/underserved areas to receive training (NASFAA, 2012a).



Leadership Anthology

In 2012, NASFAA published its anthology "written for financial aid professionals by financial aid professionals": *You're the Director: A Guide to Leadership in Student Financial Aid*. The book presents a collection of advice and insights, from financial aid professionals and others, surrounding "leadership concepts, long-term planning, change management, [and] budgeting." Authors donated their work, and NASFAA applied all 2011 proceeds from sales of the book toward funding the Dallas Martin Endowment for Education and Public Policy (NASFAA, 2013b).

The Dallas Martin Endowment for Public Policy and Student Aid

The Dallas Martin Endowment (DME) for Public Policy and Student Aid was created by NASFAA's Board in April 2008 and honors Dr. A. Dallas Martin, Jr., who retired in 2007 after 32 years of service to NASFAA. The mission of DME is to support research and best practices in public policy and student aid. DME established an initial fundraising goal of $300,000, which was reached (in 2013) through fundraising and board investment. DME funds have thus far been used to support two summer internships: to one upper division undergraduate student (Margot O'Meara) and one graduate student (Charlotte Etier), both with an interest in financial aid policy analysis and research.

Legislative & Leadership Advocacy Pipeline

NASFAA's Advocacy Pipeline invites student aid leaders from across the United States to participate in advocacy and/or negotiated rulemaking meetings on Capitol Hill. These opportunities help NASFAA to connect lawmakers and policymakers with the needs of students and financial aid professionals in the field.

Congressional Staff Programming on Capitol Hill

In 2011, NASFAA conducted its first Student Aid Orientation for Congressional Staff. The half-day program on Capitol Hill presented participants with an "overview of student aid programs and their respective histories" (NASFAA, 2012c).

NASFAA Forums on Capitol Hill

NASFAA hosted its first forum, "The State of College Access" in January 2012 in Washington, D.C. Forum attendees included Capitol Hill staff, lawmakers, and research and association colleagues and "featured two panel discussions on the role of the Federal Pell Grant in college access and persistence" (NASFAA, 2012c).

Development of the NASFAA Dashboards

Under the leadership of President Draeger, NASFAA developed detailed tracking and reporting mechanisms for functional areas and key product lines, including Membership, Webinars, NASFAA University, Communications/Media Relations, Policy, and Conferences. These Dashboards are graphical in nature, clearly demonstrate trend-lines, and are compiled and presented to the board each month (NASFAA, 2012d).

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