UNLV | ENROLLMENT & STUDENT SERVICES

Date: July 6, 2020

To: Marta Meana, Ph.D., Interim President
CC: Chris Heavey, Ph.D., Interim Provost
Via: Juanita P. Fain, Ph.D., Vice President for Student Affairs
From: Stephen J. McKellips, Ph.D., Associate Vice President for
Enrollment & Student Services
Re: Executive Summary UNLV CARES Act Funding Disbursement Strategy **REVISED**

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Please accept this revised version of our CARES Act plans. Notable contributions in this revision include updates and actual procedures, outcomes and adjustments, and finally strategies for bringing conclusion to the CARES Act process.

I. Group 1: Actual Process and Outcomes

Under the 70/20/10 proposed split, the 70% portion of funds available for semi-autonomous awarding to students based on greatest need is $8,289,853 in federal CARES Act funding.

A. The Group 1 Committee for the semi-autonomous awarding set the amounts and number of students in each award consistent with the amounts approved in advance ($1000 and $500). The committee operated on the assumption that any model for semi-autonomous awarding could be refined, so it built its rubric before the decision on how much to award was even finished.

B. The major concern was to identify one singular definition of the greatest need, and the isolation of any one variable was deemed problematic as the nature of one's level of need is compounded by many things.

C. The group decided to define the "Greatest Need" among the students would be determined jointly by two factors:

   a. EFC - the Expected family contribution derived directly from the submitted FAFSA.

   b. Unmet COA (Cost of Attendance) - The group decided to use unmet COA as the second variable.

      i. The determination of Unmet COA is best-described as the remaining balance to be paid to the university after all aid is offered, but before the consideration of any loans.

      ii. Unmet Need and Unmet COA are often identical; however, for consistency sake.

iii. Group 1 used Unmet COA to determine the students' overall need level and ranked them in the order of their identified need – greatest need (highest amount of out-of-pocket to pay with the lowest Expected Family Contribution to the lowest out-of-pocket to pay with the highest Expected Family Contribution) order.

iv. The group decided to use both variables jointly rather than weighting one variable more than another as we wanted to avoid scenarios with very low EFC's who had their entire COA already met, or students with very high unmet COA that also appeared to have greater resources as determined by a very high EFC.

v. **After several models were considered, the group landed on an EFC of $5200 or less and a unmet COA of $1200 or more. The academic breakdown for that population is in Table 1 below:**

Table 1

Academic Career	Frequency	Percent	Cumulative Frequency	Cumulative Percent	Population	Percent Population
DENT	110	1.11%	110	1.11%	345	31.88%
GRAD	1086	10.95%	1196	12.06%	4136	26.26%
LAWS	126	1.27%	1322	13.33%	440	28.64%
MEDI	99	1.00%	1421	14.32%	179	55.31%
UGRD	8499	85.68%	9920	100.00%	23651	35.94%

1. This method would require a student to have either a FAFSA, or alternative need form on file for those who would be considered for institutional funding, for the students who were ever registered in spring 2020.
   a. This strategy captures 69.34% of the population, and we could allow students to file an alternative need form to a reasonable May cutoff date.
   b. Additionally, students who would not receive Group 1 funding would still be eligible for the Groups 2 and 3 distribution of funds.

D. Following this decision to use awards of $1000 and $500, the student reach expanded to a population to 12,435.
   a. The Group 1 committee determined it would award to each student level population (Undergraduate, Dental, Medical, Law, and Graduate) a portion of total awards equal to their representation in the FASFA-submitted population at UNLV.

b. To keep the weight of the two variables (EFC and Unmet COA) equal into a need indicator, both variables were converted to their normal score (z-score) for each student level population.
c. The need indicator was then the sum of the inverse of the normal EFC value (because lower EFC indicates greater need) and the normal Unmet COA value (because higher unmet need indicates greater need).
d. **Every population was then sorted by this calculated need variable and students were awarded to meet their portion of the population. The student volume for awards are indicated in Table 2 below:**

Table 2

Academic Career	Frequency
DENT	205
GRAD	1298
LAW	205
MED	118
UGRD	10608

E. As a result of changes to federal guidance, the population of students who were deemed eligible changed dramatically after the initial distribution. As a result of these changes, 11,889 students were awarded $7.8M. Approximately $400K in awards were switched after they were first-awarded to be spent out of institutional funds instead of CARES Act funds because we could not confirm the students were eligible given the fluctuating guidance. Therefore, there remained about $400K in unspent CARES Act funding that would need to be distributed at a later time.
    a. As of June 23, 2020, there were 10,409 students who had accepted their awards at $6.8M in CARES Act expenditures.
    b. The total unclaimed volume (awarded less the claimed) measured a little more than approximately $1M.
F. July 15, 2020, marked the deadline for which students must claim their awards.

II.   Group 2: Actual Process and Outcomes

Under the 70/20/10 proposed split, the 20% portion of funds available for those who complete the Request Form and the corresponding FAFSA is $2,368,529 in federal CARES Act funding.

1. Separated the population of CARES Act-eligible students (those with a FASFA on file)
2. Added a column to the student record with the EFC score *(NOT the actual EFC).*
    a. Those who are not CARES Act-eligible will be eligible for limited institutional dollars as long as the student submits the Alternative Need Determination Form before the May 31, 2020, deadline to complete the grant-awarding process.

b. This alternative need form produces a quasi-EFC that can be used to identify a students' family need position from this population. It is important to know that limited resources suggest that not all the eligible students will be able to receive a grant, regardless of whether they submitted the FAFSA or the Alternative Need Determination Form.
c. Review-process for Group 2:
    i. Students must submit either a FAFSA or the Alternative Need Determination Form by May 31, 2020.
    ii. All review decisions assess the student's responses to the open-ended questions that were available on the Request Form.
    iii. All personally identifiable information from the students will be removed leaving only an ID and the responses to the open-ended questions.
    iv. The scoring results of the open-ended questions will be combined with the data results from the rest of the Request Form to manufacture an aggregated score on the student's request. The weighting method for these final scores will be outlined later.

Data Separation:
1. Separate each pool of eligible candidates into 10 decile thresholds (10 even-sized groups) separated by EFC levels
    a. Each eligible pool of candidates (those who have submitted either the FAFSA or the Alternative Need Determination Form) will be divided into these 10 groups.
    b. The 10 groups will be scored in inverted numerical order. The score per range is calculated in a base-10 format.
        i. **The lowest EFC decile will score 100 points**
            1. Lowest EFC scores the highest points.
        ii. **The 2nd lowest EFC decile will score 90 points.**
        iii. **The 3rd lowest EFC decile will score 80 points.**
            1. Etcetera…
        iv. **The 9th lowest EFC decile will score 20 points.**
        v. **The 10th lowest EFC decile will score 10 points.**
            1. Highest EFC scores the lowest points.
        vi. *NOTE: Initial review identified that there were so many 0 EFC records for students that the volume did not naturally split into values that would differentiate on 0 EFC from another, and the risk of placing weight across the EFC value is not suitable with so many 0 levels.*
            1. The adjustment in the separation of the files has been maintained to keep the volume necessary to read fair and equitable for the committee.
                a. The scoring method for weighting the EFC changed because of the dominant volume of 0 EFCs in the pool.
                b. The first three deciles are all considered the lowest EFC totals and tie for the representative 100 points.

c. The first non-0 EFC is decile 4, and that decile now qualifies for the 2nd lowest EFC category as well as the corresponding 90 points.
d. The next lowest decile (5) would now get the corresponding 80 points, etc.
e. The decile that represents the highest EFC scores in the pool, which also corresponds to the lowest point total for EFC, will actually be worth 30 points instead of the initial 10 that was predicted.
    i. The decision to elevate all the remaining deciles comes from the fact that the initial candidates in the 4th decile have EFCs that are very near 0 (specifically 2, 5, 10, etc.) and while there's a natural separation, the numbers remain very close. So, the priority to keep their scores closer to the point totals received from those who have EFCs of 0 was greater than the desire to keep the 10th decile closer to 10 points.

B. **Reading Strategy:**
  a. When the Group 2 Request Form closed, there were 7,208 submissions from students desiring to be considered for CARES Act funding.
    i. The 7,208 splits into 2 groups first where one group has submitted the FAFSA and measures around 4,677 (approximately 65%) and the other group which has not submitted the FAFSA measures around 2,531 (approximately 35%).
  b. Prior to reviewing Group 2 funding, the 20% allotment of funding was increased to around $3,397,000 for this group.
    i. *Because there were shortages in the awarding of Group 3 funding, the balance of Group 3 (unspent) was allocated to Group 2 and allowed for an increase in the distribution of these awards*
    ii. Given the $1000 and $500 awarding structure, the review committee is charged with determining how many students receive what sized awards as it was determined all eligible CARES Act eligible students would be able to receive funding.
      1. That distribution value suggests that approximately 75% of those who submitted a FAFSA might be eligible to receive CARES Act funding by the numbers.
C. Decile assignment was determined by combining EFC score and request form quantitative score from the Likert questions submitted
  a. Originally, three components (EFC, survey quantitative, survey open-ended) were to be assigned weights and multipliers and then combined into a final score, from which a final decile was assigned.
  b. Scoring
    i. EFC score has already been assigned as outlined above

1. 100 points for the 3 deciles containing zero values, 90 points for the next decile, 80 points for the next, until the last decile receives 30 points rather than the 10 points due to the combined zero EFC group
    ii. Quantitative survey
        1. The survey is based on a scale from 1 - 121. The score will be normalized to be a value on a 100-point scale.
        2. This change simplifies the calculation and matches the 100-point scale used for the EFC scoring.
  c. Weighting
    i. Previous rubric iterations showed committee agreement for a ⅓ and ⅔ split for the EFC component and the survey component), respectively. Since not all individuals will have an open-ended score, only EFC and survey quantitative are available.
        1. Therefore, it is recommended that the EFC score and survey quantitative score be combined using a ⅓ weighting for EFC and ⅔ weighting for survey quantitative to create a combined score.
    ii. This combined score would then be used to create deciles for determining which decile groups' open-ended responses will be reviewed by the committee - specifically around the demarcation line for the $1000/$500 awarding zone. With about 460 individuals per decile (in the CARES eligible group).
  d. Open-ended response committee review
    i. After analyzing the deciles using the scoring methodology above (⅓ EFC score, ⅔ survey quantitative score), there were no natural break points found and many scores fall within the middle of the range.
        1. It is recommended that only the top two deciles' open-ended responses be removed from committee review because they represent close to 1,000 individuals (n = 936) for which top awards could be assigned.
        2. This represents the top 20%. Low decile ranked individuals could move up in rank and potentially qualify for the higher award depending on how the open-ended score is weighted for those being evaluated, therefore, it is not recommended that lower decile individuals should not be removed from open-ended response committee review.
    ii. The divisions used reflect the quantitative Request Form scores that were also divided into deciles.
        1. The starting point for these deciles would be approximately Decile 3 would reflect approximately the 1000 person as ranked through Decile 6 where it would be presumed that the rankings would be safely in the $500 range.

2. The open-ended questions have the missing value link to determine which candidates might move up, or down, in the rankings.
3. The quantitative results are known and separated already before the committee reads.
4. EFC values are already known before the committee reads.
5. The multipliers are largely in effect and have created a tentative order of prioritization where we know exactly which candidates are most likely to be at risk for being around the cut line.
   a. This process would help the committee identify the cut line of demarcation between the $1000 and the $500 recipients.
6. This method would allow for much faster processing time and faster distribution into the hands of the students.

D. **Reviewing/Scoring Open-Ended Responses:**
   a. Each reviewer reviews the open-ended contents within an Excel document. Each reviewer will enter their score for these responses in the same Excel document for each candidate.
   b. The data will be collected and aggregated after reviews are completed.
   c. Each candidate's open-ended responses will be reviewed independently by 2 different members of the review committee to maintain consistency in the scoring and reduce any unintended bias.
   d. Each response is graded individually by each committee member
      i. Each reviewer will receive a list of candidates to review.
      ii. The review will be the initial reviewer on half of the responses and the second reviewer on the other half.
      iii. No reviewer is aware if they are the first or second reviewer of the record.
      iv. No reviewer can see the outcomes of any of the other reviewers' findings on the open-ended questions.
   e. The score results will be aggregated by an internal data analyst who was not reading any of the submissions to remove bias.
   f. The two scores are averaged together, and a single score is included on the student's Request Form.
   g. In cases where the two scoring outcomes are greater than 5 points apart, the data analyst will seek out a new, 3rd, reviewer who had not previously reviewed the same responses.
      i. The 3rd reviewer scores the responses independently, and the lowest score is thrown out while the other two results are averaged instead.
      ii. If the results continue to show a 5-point margin, a 4th reviewer is consulted, and the process is repeated until there are 2 scores available to average.

E. **Scoring Rubric for Open Ended Questions:**
   a. Review committee members are looking to evaluate the students' responses to determine a need score for the responses provided.
   b. Students are not graded by syntax, sentence structure, essay-writing skills, or any other grading criteria usually found when reading written work from students.
   c. Students were asked to describe their levels of need, so this evaluation is to determine a score for the candidate's level of need as it was explained.
   d. Review committee members will score the two open-ended responses into a singular score value 1-10, where 10 is the highest score.
   e. The highest score is loosely translated as the highest level of need.
   f. Students are not evaluated against other students, so multiple students can receive the same need score by the same reviewer.
   g. Each review committee member should feel comfortable to use the entire 10-point scale to ensure differentiation among the candidates.
      i. The calculation of value for each score is listed below:
         1. Scores of 9-10 suggest student need is worthy of the largest award
         2. Scores of 7-8 suggest student need is definitely worthy of the smallest award, and possibly the largest
         3. Scores of 5-6 suggest the student need is possibly worth the smallest award.
         4. Scores of 3-4 suggest the student need is only worth the smallest award if there are sufficient funds available.
         5. Scores of 1-2 suggest the student need is not worth the recommendation of funding.

F. **Need-Score Weighting (a Base-5 Multiplier):**
   a. There is a need to value the scoring of a candidate's need to sufficiently create candidate separation.
   b. There are limited dollars to award, so separation among the pool is necessary to determine potential differentiation among the candidates.
   c. The Need-Score Weighting metric is as follows:
      i. Scores of 9-10 feature a multiplier of 25 to create a final qualitative score value.
      ii. Scores of 7-8 feature a multiplier of 20 to create a final qualitative score value.
      iii. Scores of 5-6 feature a multiplier of 15 to create a final qualitative score value.
      iv. Scores of 3-4 feature a multiplier of 10 to create a final qualitative score value.
   v. Scores of 1-2 feature a multiplier of 5 to create a final qualitative score value.

G. **Combining the Quantitative and the Qualitative Results for a Total Request Form Score:**

a. The quantitative results offer candidates an opportunity to answer more questions with very defined results. The maximum score possible on the Request Form for the Likert questions is 121.
b. To eliminate potential bias, the review committee agreed that the quantitative was to be worth approximately 66% of the total Request Form scoring for each student.
c. The qualitative, open-ended responses were to be weighted at approximately 33% of the total score.
d. The quantitative score is weighted an additional 4.15x to aggregate the Request Form total to maximum of 750 points, where 500 (actually 502 - but nobody scored the actual maximum) points is the maximum for the quantitative (Likert) questions and 250 is the maximum for the qualitative (open-ended) questions.

H. **Combine the Request Form Score with the EFC Score to Create a Calculated Need Score:**
   a. The Calculated Need Score represents the combination of the Request Form Score with the EFC score from the initial decile data separation.
   b. To eliminate potential bias, the review committee agreed that the Request Form was to be worth approximately 66% of the Calculated Need Scoring for each student. That calculation makes the maximum Request Form Score equal to 750.
   c. The EFC scoring was to be worth approximately 33% of the Calculated Need Scoring for each student. That calculation makes the maximum EFC Score equal to 375.
   d. The maximum Calculated Need Score (Request Form total + EFC Score total) is equal to 1,125 points.
      i. Any student who scores 1,125 would demonstrate the Greatest Need in this equation.
      ii. All students would be calculated in the order of the Calculated Need, and the awarding will be distributed in descending order of the Calculated Need until such time that the funds are exhausted.
   e. Final Group 2 statistical analysis for those students who submitted a Request Form (who also submitted a FAFSA) is reflected in Table 3 below:

Table 3
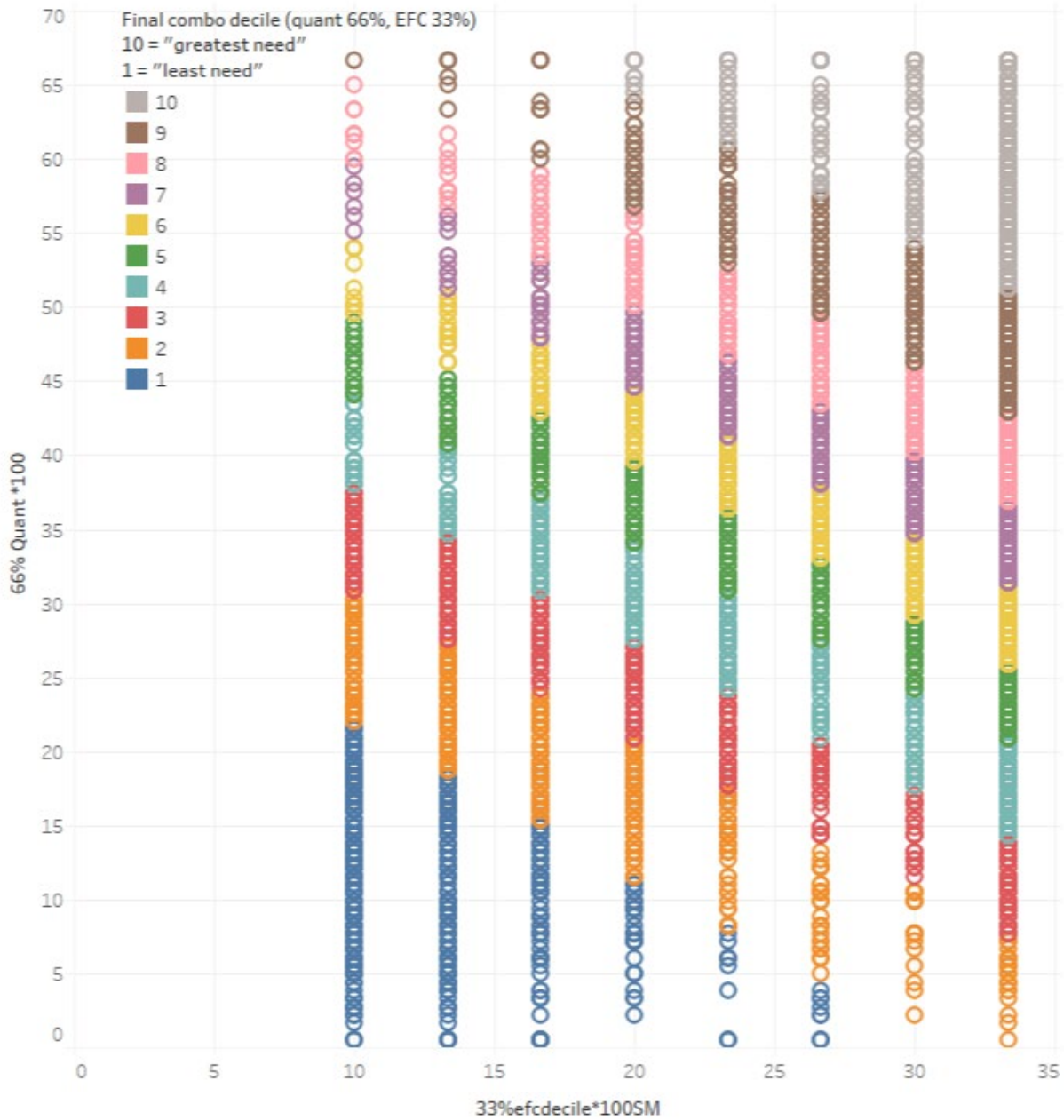
f. The slanted colors (to the right) reflect that the students with the least need (blue) on the quantifiable questions on the form were also scoring low on the EFC bands – as designed. Further, those students with the greatest need (grey) were heavily impacted on the right side where the highest EFC bands were located. Ideally not perfect, this chart reinforces that the intention to keep the greatest need in place was representative within the structure of the process, and the students with the greatest need continued to be serviced by this Group 2 methodology.

III. Group 3: Actual Process and Outcomes

Under the 70/20/10 proposed split, the 10% portion of funds available for those who complete the institutional request forms submitted by UNLV personnel was initially tagged at $1,184265 in federal CARES Act funding.

A. Distributed at the same time as the Request Form went out to students, the internal UNLV staff nomination form was distributed to all UNLV faculty and staff through the UNLV Official email list serve. This nomination form invited faculty and staff to identify students who they know to have been impacted by COVID as a direct result of their participation with the university in some programmatic or participatory way during the Spring 2020.
   a. A review rubric was created to evaluate the nominations using a fair and consistent methodology.
   b. Group 3 requests were evaluated prior to the start of the review period for Group 2 since there were few nominations compared to the Group 2 submissions.
   c. Faculty and staff were encouraged to submit their nominations by May 15, which was also the deadline for the students to identify their interest with the Request Form.
   d. The same review committee used for Group 2 was also used to evaluate the Group 3 requests.
B. There were not many submissions. In all, fewer than 30 faculty and staff members submitted names or populations for review. When they did, there was great overlap as more than 5 of the submissions came from the music department and sought top-quality equipment for students who were now facing remote instruction.
   a. Many requests were very general "all graduate students," "all international students," "all music students," which made identifying the populations very difficult.
C. There was a plan to award approximately 1,776 students, but the committee only agreed to award approximately 125 students, where 85 received CARES Act funding and the remainder received institutional funding.
   a. One reason there were so few students awarded was because Group 3 was looking for students who were impacted specifically because of the participation in a UNLV activity or program.
      i. Most of these requests were identifying students who were simply enrolled but there was no specific impactedness above or beyond any other student.
   b. Another reason there were so few students was the failure to identify students who were impacted.
      i. General, broad-brush statements about a large population of students left the committee no good way of knowing which students had a specific impact and which ones did not.
   c. The students who were awarded featured specific calls for support from the committee for very specific reasons.

      i. There were graduate students who had their research interrupted and thus were unable to graduate.

      ii. There were housing insecure students who were isolated in the university residence halls.

      iii. There were also low EFC students identified who had not received an award from the first Group distribution.

D. In the end, the committee decided not to grant the general request for large groups. Instead, the concentrated on those requests where the employee identified specific students, their potential impacts, and focused on COVID-related issues. There was one large group involved who did get an award, but that group (Athletics) had a concentration of $0 EFC candidates who had not been awarded because the remainder of the financial aid packages reflected the impact of their athletic scholarships and reduced their Unmet COA. As such, these students were granted support on the basis of their $0 EFC.

    a. There were approximately 125 students awarded, including the use of both federal CARES Act money and institutional funding.

E. The unspent Group 3 dollars were redistributed into Group 2 to maximize the distribution of funds in that Group.

    a. The resulting movement of the funding increased the ability to award all eligible students in that group.

F. Observational results – Recommendation to Re-Open the Group 3 Nomination Form

    a. Given that COVID has continued to impact the lives of students who were enrolled in Spring 2020 to include Summer 2020 and potentially the Fall 2020 (and possibly beyond), it has come to the attention of the University that some students were not hardest hit until after the May 15 deadline has passed.

      i. **The current recommendation is Re-Open the Group 3 Nomination Form until all CARES Act resources are fully distributed.**

        1. There remains approximately $400K in unspent CARES Act that was displaced when Group 1 had to change a substantial number of students into institutional funds.

        2. There remains approximately $1M in unclaimed money from those who were awarded funds but who have not yet accepted the money in MyUNLV.

      ii. Re-opening the Group 3 Nomination Form process will allow for the institution to identify, vet, and nominate impacted students for money in ways consistent with the original intention of the Group 3 process

        1. **Three previously identified rules will need to be removed to re-open Group 3**

          a. *The May 15, 2020, deadline would be lifted and new nominations would be authorized until the CARES Act funds are fully distributed.*

i. Individual staff members would be able to still submit for students with whom they come into contact with moving forward.
   b. *The dollar value of the awards would need to become flexible*
      i. The initial awards of $1000 and $500 were helpful, but in many cases the challenges of COVID can be far greater than those amounts
      ii. I recommend expanding the potential award to reflect the federal limits – up to the value of PELL (which is capped at $6,195 per person).
      iii. The nominator would need to vet the candidate to determine how much money is needed/requested and complete the form accordingly.
      iv. The committee (or subsection of the committee) would then vet the request and award accordingly.
   c. *Eliminate the restriction on stacking or collecting multiple awards*
      i. Nearly 85% of all FAFSA filing students have already received their award, and there is still $1.4M unclaimed or unawarded. There is no way to award the remaining students the remaining balance without recognizing that these students are not the ones with the greatest need.
      ii. The limitation on PELL eligibility would exist, but it could mean additional money for those who need it the most.

IV. *Recommending Group 4 – a new addition to the plan*

Under the 70/20/10 proposed split, the totality of the award money was not fully distributed. In fact, there remains $1.4M in unspent federal CARES Act funds, though approximately $1M of that total was distributed and unclaimed. This Group 4 recommendation represents an additional strategy to distribute any remaining federal money to students in compliance with the initial provisions from the Department of Education.

A. Award Title IV-eligible students who have already received CARES Act funding during the Spring 2020 semester. These students, who have already accepted their initial awards, would have already demonstrated that they have been impacted by COVID and would not have to re-accept new monies.
   a. The population of students who would be eligible to receive these funds would be different from the previous strategies but still try to impact those with the greatest need as much as possible.

b. **The population to be eligible for the Group 4 distribution would include:**
    i. **Students who have a 0 EFC from the 19-20 FAFSA used during the Spring 2020 semester and/or Summer 2020**
        1. **AND~**
    ii. **Students who have a 0 EFC from the 20-21 FAFSA that projects during the Fall 2020 semester**
        1. **AND ~**
    iii. **Students who have active registration (>/= 6 credits) for Fall 2020.**
c. Eligible students include undergraduate students and graduate college students though professional school students are not included in this distribution
d. **Students will be issued $500 awards from the lowest-to-highest award levels**
    i. **In the event there are more students with $0 EFCs than there is money available, the second measurement will be the initial ranking in Group 1 awarding to determine the awarding order until the funds run out.**
    ii. The initial distribution of Group 1 did not prioritize the $0 EFC, so this distribution will be inherently different as only $0 EFC students are eligible.

B. **To make the Group 4 distribution cycle work properly, the same rule changes that were necessary when re-opening Group 3 are also necessary for Group 4**
    a. *The deadline to distribute the funds will no longer apply as these will be distributed after the funds are reclaimed (after July 15, 2020).*
        i. These funds will automatically move to refund status, resulting in the unlikely event of students not being able to accept these reclaimed monies.
    b. *The award totals will need to become flexible because students have a maximum of PELL eligibility.*
        i. Depending on how much money is awarded from all sources, students may not have enough room to take the entire $500, so the potential to adjust the total award to accommodate whatever remaining balance would be necessary.
    c. *The need to remove the stacking component would be imperative.*
        i. With nearly 85% of all eligible students having already received the award, there's no good way to award the remaining balance without allowing the money to stack for students who have already received an award once already.