

Solicitation Name: John R. Justice Grant  
Program

Applicant: Iowa College Student Aid  
Commission

## APPLICATION FOR

1. TYPE OF SUBMISSION Application Non-Construction		2. DATE SUBMITTED 07/27/2010	APPLICATION IDENTIFIER
		3. DATE RECEIVED BY STATE	STATE APPLICATION IDENTIFIER
		4. DATE RECEIVED BY FEDERAL AGENCY	FEDERAL IDENTIFIER
5. APPLICANT INFORMATION			
Legal Name Iowa College Student Aid Commission		Organizational Unit Iowa College Student Aid Commission	
Address (city, state, and zip code) 200 10th ST 4th FL Des Moines, Iowa 50309-3609		Name and telephone number of the person to be contacted on matters involving this application Todd Brown (515) 725-3405	
6. EMPLOYER IDENTIFICATION NUMBER (EIN)		7. TYPE OF APPLICANT State	
8. TYPE OF APPLICATION New		9. NAME OF FEDERAL AGENCY Bureau of Justice Assistance	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE Number: 16.816 CFDA Title: 16.816 ; John R. Justice		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT State-administered program to provide student loan repayment for local, state, and federal public defenders and local and state prosecutors.	
12. AREAS AFFECTED BY PROJECT State of Iowa			
13. PROPOSED PROJECT		14. CONGRESSIONAL DISTRICT(S) OF	
Start Date: 09/01/2010	Ending Date: 08/31/2011	a. Applicant IA02	b. Project IA02,IA03,IA04,IA05,IA06,IA07,IA08,IA09,IA10,IA11,IA12,IA13,IA14,IA15,IA16,IA17,IA18,IA19,IA20,IA21,IA22,IA23,IA24,IA25,IA26,IA27,IA28,IA29,IA30,IA31,IA32,IA33,IA34,IA35,IA36,IA37,IA38,IA39,IA40,IA41,IA42,IA43,IA44,IA45,IA46,IA47,IA48,IA49,IA50,IA51,IA52,IA53,IA54,IA55,IA56,IA57,IA58,IA59,IA60,IA61,IA62,IA63,IA64,IA65,IA66,IA67,IA68,IA69,IA70,IA71,IA72,IA73,IA74,IA75,IA76,IA77,IA78,IA79,IA80,IA81,IA82,IA83,IA84,IA85,IA86,IA87,IA88,IA89,IA90,IA91,IA92,IA93,IA94,IA95,IA96,IA97,IA98,IA99,IA100
15. ESTIMATED FUNDING		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?	
a. Federal	\$100,000	Program is not covered by E.O. 12372	
b. Applicant	\$0		
c. State	\$0		
d. Local	\$0		
e. Other	\$0		
f. Program Income	\$0	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?	
g. Total	\$100,000	N	
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS REQUIRED.			
a. Typed Name of Authorized Representative Karen Misjak		b. Title Executive Director	c. Telephone number (515) 725-3411
d. Signature of Authorized Representative		e. Date Signed	

Iowa John R. Justice Grant Program

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## **Program Narrative**

The John R. Justice (JRJ) Grant Program is a federally-funded, state-administered program that will provide student loan repayment assistance to local, state, and federal public defenders and local and state prosecutors. The JRJ Grant Program provides funding to repay loans made through the Federal Family Education Loan Program, William D. Ford Federal Direct Loans, Graduate and Professional Student PLUS Loans, Federal Perkins Loans, Federal consolidation loans and Federal Direct Consolidation loans. This program is intended to help Iowa attract and retain talented attorneys in public interest law. The Iowa College Student Aid Commission administers Iowa's JRJ Grant Program

As a major resource for student-borrowers the Commission offers research on postsecondary access, an Information Service Center, a web-based career and educational planning program, and information concerning college and financial aid opportunities via the web, print publications, and in-person outreach activities. The Iowa College Student Aid Commission has the capacity and structure in place to administer the services and activities authorized by the JRJ Grant program consistent with the agency's well-established programming procedures.

The Iowa College Student Aid Commission (Commission) is an agency of Iowa state government whose mission is to advocate for and provide a continuum of services to support Iowa students and their families as they explore and finance educational opportunities beyond high school. The agency embraces the purposes of the JRJ program as consistent with its mission and expertise. Throughout the 40 years of its existence, the Iowa College Student Aid Commission has connected students and families with the resources and services essential to

making postsecondary education possible including student financial aid from scholarships, grants, student loans, and student loan repayment programs.

***Program Plan and Program Model***

The Iowa College Student Aid Commission administers loan forgiveness programs intended to attract and retain talented professionals in several professional fields, including nursing, teaching, and certain medical fields. The Commission will administer the JRJ Grant Program in a manner consistent with general procedures in place for similar existing student loan repayment programs administered by the agency. Under this program model, applicants shall apply directly to the Iowa College Student Aid Commission which, with consultation from an advisory committee representing professionals practicing in public interest law and consistent with applicable guidelines, shall determine which applicants shall receive funding. The Iowa College Student Aid Commission will work to ensure that an equal number of awards are made to prosecutors and defenders, that funding for loan repayment is allocated equally between prosecutors and public defenders each year, and that the total amount of loan repayment funding awarded to eligible prosecutors is equal to the total amount awarded to eligible public defenders.

A standard award will be awarded to recipients within each of the five districts. A similar number of recipients will be chosen from each of the five districts. Priority for awards will be based on a formula that ranks each applicant according to the applicant's "ability to pay" their student loans.

***Outreach Strategy***

Upon receipt of the JRJ Grant award, the Iowa College Student Aid Commission will conduct outreach (e.g., communications to state professional organizations of local, state, and

federal public defenders and local and state prosecutors) and will solicit applications from eligible recipients.

The Iowa College Student Aid Commission will—

- administer the program in a manner consistent with other similar programs it administers;
- work in partnership with the Iowa County Attorneys Association, whose members include all Iowa prosecutors, to distribute information about program opportunities and application procedures;
- work in partnership with the office of the State Public Defender to communicate with all public defenders, all of whom are state employees;
- develop print and electronic informational materials for statewide distribution consistent with its mission and ongoing efforts in support of Iowa students and families as they explore and finance postsecondary education;
- distribute information about the JRJ program as part of its routine efforts in connection with administering state grant, scholarship, and student loan repayment programs (e.g. during regular in-person outreach activities and events conducted by the agency);
- provide information via the IHaveaPlanIowa web portal; the web portal incorporates and provides enhanced public access to a wide range of informational resources of several Iowa state agencies; it received some 200,000 site visits in 2009-10;
- in all informational outreach efforts, will equally emphasize opportunities for both prosecutors and public defenders.

### ***General Grant Application Process***

The agency will collect application information from all applicants by means of the Iowa JRJ Grant Program Application. (A copy of the student-borrower application form is attached to this grant application.) The agency will make the application available on-line (in a downloadable, printable version) and by mail upon request. Prospective beneficiaries will be required to submit completed applications. The maximum JRJ award to any single recipient for FY2010 in Iowa will be \$10,000.

### ***Agency's Plan for Fairly Distributing Funding based on Geography & Population Density***

The Commission will ensure that funding is not isolated or heavily concentrated in any single geographic section of the state. To ensure that distribution of awards is as widespread as possible, the Commission will distribute awards evenly among all five Iowa congressional districts. Congressional district boundaries are based on population; each of Iowa's five congressional districts includes nearly exactly 20% of the state population. After ranking applications based on applicants' ability to repay their loans, the Commission will make awards to an equal number of residents of each district with the least ability to repay their loans in each award year. Each beneficiary will be given priority consideration to receive funding during the second and third years of the three- year service agreement, depending on the availability of funds. Renewal shall not be automatic, however, and nothing shall obligate the Commission to renew a benefit in the same or greater amount previously received by a beneficiary.

### ***Evaluation Criteria for Applicants***

#### **1. Applicants must meet the following eligibility requirements.**

- a. Applicant must be an eligible prosecutor or public defender in the State of Iowa as defined for the JRJ Grant Program.

- b. Applicant must complete and file annual applications by the deadline established by the Iowa College Student Aid Commission. If funds remain available after the application deadline, the Commission will continue to accept applications.
- c. Applicant must have outstanding eligible educational loan debt, described as:
  - i. A loan made, insured or guaranteed under part B of subchapter IV of chapter 28 of Title 20 (Federal Family Education Loan Program)
  - ii. A loan made under part C or D of subchapter IV of chapter 28 of Title 20 (William D. Ford Federal Direct Loan and Federal Perkins Loans)
  - iii. A loan made under section 1078-3 or 1087e(g) of Title 20 (Federal consolidation loans and Federal Direct Consolidation loans, respectively)
  - iv. A Graduate and Professional Student PLUS Loan.
- d. Applicant must have loan repayments based on a repayment schedule of 10 years or greater. (Applicant may have fewer than 10 years remaining in repayment schedule; payments must be based on a repayment schedule of 10 years or greater.)
- e. Applicant must be employed in an eligible prosecutor or public defender position for each year of the three-year contract period.
- f. Applicant must have been employed in an eligible prosecutor or public defender position as of January 1, 2009.
- g. Applicant must be continually licensed to practice law in the State of Iowa.
- h. Applicant must be employed full-time, which is not less than 75 percent of a 40-hour work week.
- i. Applicant must not be in default on any federal student loans.

j.

## **2. Award Amounts**

All award recipients shall receive an equal award amount up to the maximum award amount. The Commission shall set the maximum award amount based on available funding. The maximum JRJ award for FY2010 in Iowa will be \$10,000.

## **3. Selecting Awardees (Agency's Plan to Give Priority Consideration to Applicants with Least Ability to Repay their Loans)**

The Iowa College Student Aid Commission shall determine which applicants shall receive funding with consultation from an advisory committee representing professionals practicing in public interest law , and consistent with applicable guidelines. Iowa shall give priority to those eligible beneficiaries who have the least ability to repay their loans.

- The Commission shall select recipients from those who have submitted a complete application.
- The total number of payments made for qualified applicants in a given fiscal year is contingent upon available funding. If funding is insufficient to make awards to all eligible applicants, first preference is given to renewal applicants.
- Priority shall be given to those who file timely applications and are considered the least able to pay their student loans.
- The following data elements shall be used to calculate ability to pay:
  - Adjusted Gross Income (Abbreviated as AGI. From Form 1040, U.S. Individual Tax Return 2009, line 37.)
  - Adjustment for cost of living in area of applicant residence (Multiplier shall be based on the most recent ACCRA Cost of Living Index.)

- Total annual payments for eligible student loans (Monthly payments multiplied by twelve. Payments must be based on a repayment program of 10 years or greater.)
- Total educational loan debt.
- Benefits to individual applicants will be awarded based on a formula that ranks each applicant according to their total annual payments for eligible student loans as a percentage of their AGI adjusted for cost of living in the area of residence (metro- or micropolitan statistical area) and factoring their total educational loan debt. Specifically, individual applicants will be ranked according to the following formula and benefits shall be awarded to an equal number of residents the highest Least Ability to Pay Scores within each Iowa Congressional District:

	(total annual payments for eligible student loans) + (total education loan debt ÷ 10)
Least Ability to Pay Score =	-----
	(AGI x 1/simple average of ACCRA Cost of Living Index for Statistical areas in Congressional district where applicant resides)

Note that evaluation criteria incorporate data necessary to comply with the statutory requirement that priority consideration be given to those with “the least ability to repay” their loans. The Iowa College Student Aid Commission will give priority consideration to those applicants with the least ability to repay their loans.

#### **4. Procedures for Cost of Living Adjustment**

As indicated above (under “**Selecting Awardees**”), the Commission shall use the ACCRA Cost of Living Index to adjust for cost of living in the applicant’s area when determining Least Ability to Pay. To adjust for cost of living, the Commission will multiply applicant AGI by 1

over the simple average of ACCRA Cost of Living Indexes for statistical areas in the Congressional district where applicant resides

<b>Metro/Micropolitan Statistical Area</b>	<b>ACCRA Cost of Living Index – 2009 Annual Average Data 100% Composite Index</b>
Ames IA Metro	96.6
Burlington IA-IL Micro	97.7
Cedar Rapids IA Metro	91.2
Davenport-Moline-Rock Island IA-IL Metro	96.7
Des Moines IA Metro	90.6
Dubuque IA Metro	94.6
Iowa City IA Metro	95.8
Mason City IA Micro	86.3
Omaha NE-Council Bluffs IA Metro	89.3
Waterloo-Cedar Falls IA Metro	89.2

**5. Recipients must maintain the following eligibility requirements.**

- A recipient must continue to make regular student loan payments.
- A recipient must respond to any notifications from the Commission and must notify the Commission of changes to his or her address, employment status or loan status (default) within 30 days of the change.

- If an individual becomes ineligible or does not complete the requisite three-year commitment due to voluntary separation or involuntary separation for misconduct or unacceptable performance, the recipient can no longer receive benefits and must repay any amounts received under the program. Arrangements for repayment will be made with the U.S. Department of Justice.

***Technical application process***

- Applicants apply directly to the Iowa College Student Aid Commission. A sample version of the student-borrower application form is attached to this grant application. The agency will make the application available on-line in a downloadable, printable version and by mail upon request.
- Applicants must submit an application packet by the due date published by the Iowa College Student Aid Commission.
- An application packet includes the application, employer verification form, loan account statement(s) and a signed service agreement.
- Loan payments will be disbursed upon completion of the year for which forgiveness was approved and upon certification from the employer that the public defender or prosecutor was employed during the entire year and completed the year in good standing.
- Loan proceeds will be distributed to the recipient's student loan holder and applied directly to eligible loans.
- The Commission shall keep on record, available for audit purposes, any record it has relied upon to support its funding decisions.

### ***Agency Reporting and Performance Measures***

The Commission will submit quarterly financial status reports, quarterly performance metrics reports, and semi-annual progress reports as required by the John R. Justice Grant Program. In order to assess the impact of the John R. Justice Grant Program on the recruitment and retention of prosecutors and public defenders in Iowa, Commission staff will conduct an annual survey of prosecutor and public defender offices.

To assist the United States Department of Justice in fulfilling its responsibilities under the Government Performance and Results Act (GPRA), the Commission will collect, maintain, and report data necessary to measure outcomes associated with the John R. Justice Grant Program in Iowa. Agency methods for collecting data for GPRA performance measures include the following:

- Agency administrative staff shall maintain records of the number and dollar value of loan repayments to public defenders and prosecutors as part of regular program responsibilities; these responsibilities shall be part of the normal job duties of assigned program staff.
- As part of their assigned job duties, program staff will maintain a file of records concerning outreach materials developed for the JRJ program, including expenditures and marketing materials products.
- As part of their assigned job duties, program staff will maintain a file of records of all applications and payments, including dates, from which shall be calculated: a) the total number of applicants; b) total number of applicants who are eligible public defenders; c) total number of applicants who eligible prosecutors; c) number of recipients of loan payments; d) total number of days that elapsed between receipt of applications by

Commission staff and disbursement of loan repayment on behalf of the selected beneficiary.

- As part of their assigned job duties, program management officials shall maintain records necessary to calculating dollar amount expended for management and administration of loan repayments; e.g., records shall concern costs for staff time on JRJ program-related activities, postage, and materials.
- As part of their assigned job duties, program management officials shall maintain records necessary to calculate non-federal contributions—if any—to this program during the reporting period.

Iowa Governor Chester J. Culver has designated the Iowa College Student Aid Commission to administer funds through the John R. Justice Grant Program for Iowa. The governor's letter is on file with the Bureau of Justice Assistance at <http://www.ojp.gov/BJA/grant/JRJStateAgencies.pdf>.

## **Budget and Budget Narrative**

### ***Budget for Year 1***

Program expenditures are budgeted as follows.

John R. Justice Student loan repayment grant awards to ten recipients at \$8,500 each. (Estimated. The Commission will make a determination of number of awards and award amounts upon review of applications.)	\$85,000
Administrative costs	\$15,000
Total	<u>\$100,000</u>

### ***Budget Narrative for Year 1***

The Iowa College Student Aid Commission budgets \$85,000 for John R. Justice Student loan repayment grant awards, at \$8,500 each, for ten recipients. This budget estimate for number and amount of awards is preliminary; the Commission will make a determination of number of awards and award amounts upon review of applications. The Commission budgets \$15,000 pay costs associated with administering the program in Iowa. These administrative costs include costs incurred in producing outreach and educational materials, application packets, website programming, and postage.