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R62I0010
Maryland Higher Education Commission
FY 2024 Operating Budget
Student Financial Assistance
Response to Department of Legislative Services Analysts

Senate Budget and Taxation
Subcommittee on Education, Business and Administration
Senator Nancy King
February 17, 2023

House Appropriations
Subcommittee on Education and Economic Development
Delegate Stephanie Smith
February 20, 2023

Pg. 15 - MHEC should explain why the information is not available for the fiscal 2024 allowance.

MHEC Response:

Projections for fiscal 2024 allowance were not initially available due to the transition in leadership. The new Director of the Office of Student Financial Assistance started in August 2022 and is still getting acclimated to the MDCAPS system and all reporting requirements. Projections for the fiscal 2024 allowance have been completed and can be found below:

Program	FY 2024 - Allocation	Projected Recipients - FY 2024	Avg. Award - FY 2024
Educational Assistance			
Grant	\$48,000,000.00	31,947	\$1,502
Guaranteed Access Grant	\$62,000,000.00	4,907	\$12,636
Rawlings Campus-Based EA	\$2,000,000.00	1,322	\$1,513
2+2 Transfer Scholarship	\$2,300,000.00	1,738	\$1,323
Part-time Grant Program	\$5,087,780.00	5,659	\$899
Graduate and Professional Scholarship	\$1,174,473.00	398	\$2,948
MDCC Promise Scholarship	\$15,000,000.00	5,726	\$2,620
Near Completer Grant	\$375,000.00	43	\$8,639
Subtotal	\$135,937,253.00	51,741	\$4,010
Legislative Programs	\$7,950,000.00	6,225	\$1,277

Career and Occupational Programs

Charles Riley Scholarship Program	\$358,000.00	54	\$6,650
Workforce Shortage Student Assist Grant	\$1,229,853.00	395	\$3,117
Teaching Fellows	\$12,000,000.00	572	\$20,980

Subtotal

Unique Population Programs	\$7,950,000.00	1,162	\$6,839
Loan Assistance Repayment Programs	\$1,370,000.00	333	\$4,112

Total

Projections for the fiscal 2024 allowance are based on the percent of increase or decrease of the average award between FY 2021 and FY 2022 divided by the FY 2024 appropriation to identify FY 2024 projected recipients for each program.

Pg. 18 - MHEC should discuss the reason for the \$10.8 million in unused appropriations available for fiscal 2022, a level much higher than that of recent years.

MHEC Response:

In FY 2022, MHEC transferred \$10.8 million of unused appropriations to the Need-based Student Financial Assistance Fund (NBSFAF). The Maryland Community College Promise Scholarship program was the primary reason for this large transfer. At the end of FY 2022, there was \$8.9 million of unused appropriation in the Maryland Community College Promise Scholarship program. The Maryland Community College Promise Scholarship program transfer (\$8.9 million) was 82.6% of the overall \$10.8 million, transferred to the NBSFAF in FY 2022.

Pg. 20 - The Secretary should comment on the increasing number of students not fulfilling the credit completion requirement.

MHEC Response:

As administrators within the higher education system, we agree that on-time college graduation is an important component of a successful system of higher education. Fewer than one in ten full-time community college students complete an associate degree within two years and just three in ten full-time students pursuing a bachelor’s degree finish in four years. "It’s Time to Redefine “Full-Time” in College as 15 Credits," *15toFinishIndiana.org*, Lubbers and Jones, September 11, 2014, updated October 1, 2021.

Since the federal government defines full-time enrollment as 12 credits per semester for financial aid purposes, students often mistake their “full-time” status with a guarantee for on-time graduation, when we know, in actuality, full-time students must take at least 15 credits per

semester, or 30 credits per year, to earn their degrees on time. This disconnect is one of the reasons why there is an increasing number of students not following the credit completion requirement. Other reasons could be residual effects of COVID and changes to the economy. Another reason is that students are registering for and attempting 15 credits, but are not successful in completing the credits. Exhibit 14 on page 22 of the analysis shows that private four-year institutions had the greatest percentage of EEA recipients who completed 30 or more credits at the end of the 2021-2022 academic year and that community colleges had the highest percentage of recipients who completed fewer than 24 credits.

Pg. 23 - The Secretary should comment on the credit completion requirement, specifically addressing what changes MHEC can make to its EEA student outreach to encourage credit completion.

MHEC Response:

Currently, EEA recipients who received the award for at least two years receive a notification at the end of the year informing them that their renewal award eligibility is contingent upon meeting certain credit completion requirements. The notification includes a chart that details the estimated award amount based upon the number of credits completed at the end of the prior academic year.

MHEC sends a notification to EEA recipients who are failing to meet the credit requirements informing them that they are ineligible for their renewal awards. In the notification, MHEC includes information on what that the recipients may do to regain their EEA awards in the subsequent year if they enroll at postsecondary institutions and complete at least 24 credits in the year in which they lost their eligibility.

To further increase awareness and encourage credit completion, MHEC will increase communication to EEA recipients about the credit completion requirements by sending communication at the end of the fall term and mid-way through the spring term to all EEA students beginning in the first year of receiving EEA funds. The notification of the credit completion requirements will be sent as a reminder to the EEA recipients that they must meet the requirements by the end of the second year of receiving EEA funds and in each subsequent academic year to remain eligible for the award annually. This notification is not specific to community college EEA recipients, but encompasses all EEA recipients receiving awards for at least three years. MHEC also suggests that a workgroup composed of representatives from each higher education segment, MHEC, and other stakeholders be created to conduct an in-depth study focused on the effectiveness of the credit completion requirement and dynamics involved in students fulfilling the requirement.

Pg. 26 - MHEC should comment findings and recommendations of the OPEGA analysis, particularly on the feasibility of the recommendations and what additional resources would be necessary.

MHEC Response:

In reviewing the findings and recommendations of the OPEGA analysis, particularly on the feasibility of the recommendations and what additional resources would be necessary, MHEC offers the following comments and suggestions:

Note: Pages of the “2022 OPEGA Evaluation of the Office of Student Financial Assistance” are referenced for each observation and recommendation.

(#1) OPEGA identified the following observations in chapter 2 and 3 of their analysis:

- *Observation (pg. 26):* Many of the lowest-income students got an EA Grant instead of a GA Grant.
- *Observation (pg. 27):* After family contributions, grants and scholarships, students with household incomes just above 130% of poverty (the GA-Initial Grant income cutoff) had the largest remaining financial need to cover the cost of attendance.
- *Observation (pg. 30):* EA recipients just above the income eligibility cutoff for GA grants needed \$7,000 more than GA recipients just below the eligibility cutoff to meet the cost of attendance.
- *Observation (pg. 33):* Guaranteed Access (GA) and Educational Assistance (EA) grants are awarded from one EEA appropriation. If GA Grant awards increase, then EA Grant awards must decrease to stay within fund limits.

In accordance with §18-303 of the Education Article of the Annotated Code of Maryland, MHEC is focused on making sure Guaranteed Access Grants (GA) are awarded to the neediest students. MHEC previously established that 130 percent of the Department of Health and Human Services (HHS) poverty guidelines, which are used for administrative purposes for determining financial eligibility for certain federal programs, would be a strong indicator to identify and award the neediest students, while at the same time managing funds. While MHEC requires “initial” students to meet the 130% income requirement, statutory law allows “renewal” students to continue to receive the GA grant as long as they remain Pell eligible. MHEC is starting to see a growth in the number of GA recipients when comparing the number of GA recipients in FY 2021 (3,094) compared to FY 2022 (3,247).

For the past three years (FY 2020 – FY 2022), an average of 3,007 students have been awarded the GA grant, with the average award amount of \$12,916 and 20,863 students have been awarded the EA grant with an average award amount of \$2,201. Between FY 2020 and FY 2022, the average total amount awarded and paid in each program was \$38,730,058 for GA and \$45,899,380 for EA. This does not include the Next Generation Scholars (Guaranteed Access Grant), which was awarded for the first time in FY 2022. The Next Generation Scholars (Guaranteed Access Grant) or “NextGen” numbers will be combined with the general GA award. MHEC is in the process of analyzing the current GA award income eligibility guidelines for initial applicants to assess if income guidelines should increase from 130% of the Federal Poverty Level (FPL) to 150% or even 180%; however MHEC will need to wait to see if

proposed legislative language in Senate Bill 662 relating to EEA awards is approved before we can move forward. If the proposed legislation is approved as it is currently written, it will have a significant impact on the EEA program and we expect that the dramatic increase in eligibility for GA will lower available funding for EA awards.

Since GA and EA grants are awarded from one EEA appropriation, OPEGA's analysis is correct in reference to the impact that GA awards have on EA awards. As the level of eligible GA recipients increases, then funds available to award EA awards decrease. However, since the creation of the EEA program, total GA grant awards have never approached the limit of EEA funds. This is largely due to the eligibility requirements placed by statutory and regulatory law. However, if the requirements in statutory law were ever to be removed, there would be a significant increase in GA recipients. The extent of the increase would be based upon which requirements are removed. For example, if the high school GPA requirement were removed, all students meeting the income eligibility requirements but graduating from high school with a GPA between 2.0 and 2.49 would become eligible and therefore increase the number of eligible recipients. If the age or timeframe requirements were removed, individuals who never went to college, took a year off, or initially went out-of-state and are now transferring back to an institution of higher education within Maryland would now be eligible for a grant and therefore increase the number of eligible recipients.

The recommendations provided on page 64 of OPEGA's analysis are as follows:

- Option #A: Budget GA and EA Grants as separate grant programs in the appropriations process.
- Option #B: Redesign GA and EA Grants as one continuous grant program with sliding scale for income eligibility criteria.

MHEC agrees with option #A. By constructing separate appropriations for the GA and EA grants, it allows OSFA to manage both funds more efficiently. GA awards would not delay or limit EA funding. Additionally, even if funding were separated, MHEC would need legislative support to hold institutions of higher education accountable to report information in a more timely manner. Although MHEC communicates with each participating institutional financial aid office, there are reoccurring instances from year to year in which some institutions do not complete reporting requirements (i.e. billing rosters) in a timely manner, this slows down the reconciliation process and prevents MHEC from being able to fund additional students. MHEC suggest that statutory language be added to give MHEC authority to cancel funds due to administrative errors when identified and hold institutions, not students, accountable for cancellations.

Option #B recommends introducing a sliding or stepped scale, which would allow higher awards to applicants who have an Expected Family Contribution (EFC) just higher than the current income limit for a GA Initial Grant. Introducing a sliding scale based upon EFC is a complicated process that would require an overhaul of the entire program. The U.S. Department of Education Federal Student Aid (FSA) is currently in the process of eliminating the EFC and converting to the Student Aid Index (SAI), which is a complex process that has caused the FSA to push back the roll out date for the conversion. To convert the EEA award process to a sliding scale, a

workgroup could be formed to develop a calculation system and implement a structure to identify award amounts with certain SAI's. However, MHEC does not recommend this approach.

(#2) OPEGA identified the following observations in chapter 4 of their analysis:

- *Observation (pg. 49):* The number of programs administered, OSFA staff, and grants distributed through OSFA-administered programs have increased since 2013, while the number of awards given by OSFA has decreased.
- *Observation (pg. 52):* OSFA has no staff dedicated solely to marketing and outreach to promote scholarships and grants.
- *Observation (pg. 54):* MHEC is not tracking how many Maryland residents who complete the FAFSA by March 1 fail to sign up for a MDCAPS account.
- *Observation (pg. 56):* MDCAPS records show that incomplete official high school transcripts and incomplete documentation for income verification were the main reasons for incomplete GA Grant applications.

The report compares 2012 and 2021, MHEC has seen a significant increase in the number of scholarship and grants programs while there has not been a commensurate increase in staff. A recent study published in the Congressional Research Service on January 27, 2021 identified that preliminary data available suggest that there have been enrollment declines during the COVID-19 pandemic (Collins, Fountain, and Dortch, 2021, pg. 2). Total postsecondary education enrollment peaked around 2011 and has declined somewhat since then. The peak enrollment may have been the culmination of a long-term increase in enrollment rates (i.e., the share of individuals enrolling in postsecondary education), possibly abetted by a short-term increase due to a high unemployment rate. The overall size of the primary college-going population (age 15-24) was also slightly higher in 2011 than in 2018. Since the enrollment peak around 2011, which followed the unemployment peak in 2010, the largest enrollment declines were at two-year public institutions and proprietary institutions. Enrollment at both public four-year institutions and private nonprofit institutions increased between 2011 and 2018. Some of the shift in enrollment is due to sector reclassification of some institutions over the period of review. For example, 67 public-two year institutions with a combined FTE enrollment of approximately 424,000 students were reclassified as public four-year institutions between 2011 and 2018. Thus, approximately one-third of the change in enrollment at public-two year institutions was due to sector reclassification.

Awards are directly connected to enrollment, therefore if enrollment declines, the number of award recipients is likely to decline. Exhibit 4.1 in the analysis illustrates a decline in awards when comparing fiscal 2013 and 2021; however, it also demonstrates an increase in dollars distributed through OSFA programs. If enrollment begins to increase post-COVID, then one can assume that the number of students awarded will increase as well. For example, in FY 2021, 3,094 students were awarded and paid the GA grant for a total of \$37,438,104, whereas in FY

2022, 3,247 students were awarded and paid the GA grant for a total of \$41,856,295. There was an increase of 151 students awarded between FY 2021 and FY 2022.

During the COVID-19 pandemic, OSFA implemented virtual appointments, which many applicants are choosing. Unfortunately, because this is new initiative OSFA does not have data on how many virtual appointments are scheduled annually.

Each phone call as well as virtual appointment to the office can take from five (5) to fifteen (15) minutes to assist applicants, so we can average each phone to be about 10 minutes. Based on the FY 2022 number for telephone inquiries, the staff spent 220,000 minutes on answering phone calls, which is equivalent to 3,667 hours. Therefore, for twelve (12) staff members answering the phone, each would be on the phone for an average of 306 hours while still having to maintain processing and all other program responsibilities for one (1) to three (3) programs, depending upon the size of the program.

With exception of the Guaranteed Access (GA) Grant, the Educational Assistance (EA) Grant, and the Maryland Community College Promise Scholarship, all financial assistance programs have applications who need to be reviewed for eligibility. Although all applicants may not end up being eligible, the applications and required documentation must still be reviewed to determine that eligibility. For FY 2022, OSFA received 44,111 high school or community college transcript documents related to the Maryland Community College Promise (Promise) Scholarship program that had to be reviewed to determine each applicant's eligibility. OSFA staff members completed all reviews. That is just one type of document that needed to be reviewed. Some of the other types of documents OSFA received and reviewed in FY 2022 included; 2,861 Dependent Student Verification Forms; 6,150 high school transcripts with 1st semester grades from Senior Year; and 2,434 2019 Parent IRS Tax Transcripts or 1040 Signed Tax Returns. OSFA staff members not only review documentation but must also enter information from the documents into the MDCAPS system. For the current FY 2023 award year, OSFA completed 19,926 verifications in which a minimum of 2-3 documents for each verification were required to be reviewed. This is compared to the 9,651 accounts verified for the Promise Scholarship and GA Grant in FY 2022. There were 24,212 accounts verified in FY 2021.

Although the number of applicants to various programs declined between FY 2020 and FY 2022, each program still requires a designated staff member to complete the processes to award applicants who applied. As mentioned, each OSFA staff is assigned one (1) to three (3) programs for which they are responsible for administering.

Recommendation (pg. 71): MGA could provide for allocation of funding directly to OSFA to promote general awareness of the Office and the programs that it administers.

The OPEGA analysis was correct in the observation that OSFA has no staff dedicated solely to marketing and outreach to promote scholarships and grants. Although, the majority of programs require that OSFA and/or MHEC to market programs to various constituents, the Office has been challenged in this area. Exhibit 2 on page 8 of the Student Financial Assistance analysis by the Department of Legislative Services (DLS) provides an estimate of completed FAFSAs by public

high school students as of January 2022, with New Jersey ranking as the state with the most completed FAFSAs. The New Jersey Higher Education Student Assistance Authority (HESAA) (www.hesaa.org) has an Outreach & Communications department within the organization with several staff members dedicated to communicating with various constituents as well as working with the Grants & Scholarships department to develop marketing materials and publications. Additionally, HESAA contracts with and compensates financial aid professionals from institutions within New Jersey to provide FAFSA and financial literacy workshops at high schools and community organizations within New Jersey.

The recommendations provided on page 63 of OPEGA's analysis are as follows:

- Option [#]: Add MDCAPS account creation as a component of Maryland's current Free Application for Federal Student Aid (FAFSA) Completion Initiative.

Following OPEGA's analysis, MHEC has begun to research the most efficient and productive method to track how many Maryland residents who complete the FAFSA by March 1 fail to sign up for an MDCAPS account as well as to inform residents to sign up for an MDCAPS account. MHEC agrees with OPEGA's recommendation and believes it is feasible to add the MDCAPS account creation as a component of Maryland's current FAFSA Completion Initiative (FCI). MHEC also recommends requiring a FAFSA completion day or week as part of the FCI for all high school seniors.

The recommendations provided on page 64 of OPEGA's analysis are as follows:

- (Transcripts) Option #: MGA could require all local education agencies (LEAs) to upload official transcripts for all high school seniors to MHEC, unless students opt out. MGA could also consider requiring all GED completion scores be uploaded to MHEC by test administrators as soon as scores are official unless students opt out.

In 2021, OSFA implemented the Grade Point Average (GPA) Upload Process. This tool has been implemented in MDCAPS for high school staff to utilize. The tool allows high school staff to verify and report all high school seniors' cumulative unweighted GPAs from their first semester of their senior year of high school. This simple upload notifies the OSFA about all students' potential eligibility for consideration for the GA grant and/or the Promise Scholarship.

If a high school utilizes the GPA Upload tool for their students who have been identified as eligible for the GA grant or Promise Scholarship, the students no longer have to submit their transcripts to OSFA through the mail, therefore streamlining the application process. High schools can also utilize the GPA Upload Process for any students who graduated from their high school on or after January 1, 2019, and are applying for various state aid programs such as the Maryland Community College Promise Scholarship, the Guaranteed Access Grant, or the Teaching Fellows for Maryland Scholarship. OSFA recommends that the MGA require all LEAs to use the GPA Upload tool.

The recommendations provided on page 70 of OPEGA's analysis are as follows:

- (Marketing) Option [#]: Ask all postsecondary schools in Maryland to include standard language in their financial aid packages to admitted in-state students about State aid opportunities including EEA Grants, MHEC, and MDCAPS.

Regarding the OPEGA recommendation, many institutions have moved to electronic notifications for financial aid packages, however MHEC agrees that statutory requirements can be developed to require institutions to provide information on Maryland financial assistance programs in the award notifications provided to students as well as on institutional webpages.

- (Structure) Option: Consider decentralization of the EEA grant award process by pre-allocating more or all of the EEA funds to postsecondary institutions for campus-based awards, allowing institutions to offer EEA grants directly to students from their institutional allocation.

The recommendation would place a heavy burden on each institution's financial aid office and would require extensive modifications in statutory law governing the program. MHEC is unsure of the feasibility of this recommendation, since it is currently experiencing challenges with institutions completing the reconciliation process with the campus-based program and other decentralized programs. MHEC believes the current controls and overall business processes to manage EEA grants work well and can be made more efficient if controls for accountability are put in place through legislation.

(#3) Remaining recommendations provided by OPEGA

Other recommendations provided in the OPEGA analysis are as follows:

Option [#] (pg. 65): MGA could authorize MHEC to accept high school transcripts after an applicant's junior year.

MHEC agrees with this recommendation; however, proposed legislation in Senate Bill 662 removes the GPA requirement. If the legislation is not approved, MHEC agrees with this option.

Option [#] (pg. 66): Stop requiring a minimum GPA or GED score for initial GA-Initial Grant eligibility, and instead rely on postsecondary admissions and subsequent satisfactory academic progress to suffice for both GA and EA Grant eligibility.

MHEC agrees with this recommendation; however, the proposed legislation in Senate Bill 662 removes the GPA requirement. If the legislation is approved, it should also include removing the minimum GED test score requirement to remain consistent with the removal of the GPA requirement.

Option [#] (pg. 67): Reduce MHEC income verification to the current statutory minimum of 25% of FAFSA and MSFAA completers, allowing MHEC staff to focus on year-round audits and smooth out their workload over the year.

For the upcoming 2024-2025 award year, the US Department of Education Federal Student Aid (FSA) will require all students and parents who have filed taxes to use the IRS Data Retrieval Tool (DRT). This will simplify the verification process moving forward. Only students and parents who indicate that they did not file federal taxes and earned no income will most likely be verified. Additionally, proposed legislation in Senate Bill 662 removes MHEC from the responsibility of verifying income and transitions the responsibility over to each institution to which the student applies.

Option [#] (pg. 68): Explore the development of a memorandum of understanding between MHEC and the Maryland Comptroller's Office to verify the State income tax return status and income level for financial aid applicants.

For the upcoming 2024-2025 award year, the US Department of Education Federal Student Aid (FSA) will require all students and parents who have filed taxes to use the IRS Data Retrieval Tool (DRT). This will simplify the verification process moving forward. Only students and parents who indicate that they did not file federal taxes and earned no income will most likely be verified. Additionally, proposed legislation in Senate Bill 662 removes MHEC from the responsibility of verifying income and transitions the responsibility over to each institution to which the student applies.

Option [#] (pg. 68): Streamline MHEC income verification by giving MHEC access to Maryland's Total Human-services Integrated Network (MD THINK) and allow applicants to be categorically income-qualified for an initial GA Grant based on their family's existing enrollment in the Supplemental Nutrition Assistance Program (SNAP), rather than requiring a redundant MHEC income verification process that demonstrates the same level of poverty.

For the upcoming 2024-2025 award year, the US Department of Education Federal Student Aid (FSA) will require all students and parents who have filed taxes to use the IRS Data Retrieval Tool (DRT). This will simplify the verification process moving forward. Only students and parents who indicate that they did not file federal taxes and earned no income will most likely be verified. Additionally, proposed legislation in Senate Bill 662 removes MHEC from the responsibility of verifying income and transitions the responsibility over to each institution to which the student applies.

(Acceptance of Award) Option [#] (pg. 69): Accept income reported in the FAFSA, either using the IRS DRT or self-attested, under penalty of perjury for those who knowingly falsify their income information.

For the upcoming 2024-2025 award year, the US Department of Education Federal Student Aid (FSA) will require all students and parents who have filed taxes to use the IRS Data Retrieval Tool (DRT). This will simplify the verification process moving forward. Only students and parents who indicate that they did not file federal taxes and earned no income will most likely be verified. Additionally, proposed legislation in Senate Bill 662 removes MHEC from the responsibility of verifying income and transitions the responsibility over to each institution to which the student applies.

(Eligibility) Option [#] (pg. 70): Allow low-income Marylanders to be eligible for an initial GA Grant after age 21 to expand access for nontraditional students.

Proposed legislation in Senate Bill 662 removes the age requirement for GA awards. The removal of the age requirement will expand the reach of all awards that fall under the EEA program.

(Eligibility) Option [#] (pg. 70): Allow low-income Marylanders to be eligible for an initial GA Grant more than one year after high school or GED completion to expand access to nontraditional students.

Proposed legislation in Senate Bill 662 removes the timeframe requirement for GA awards. The removal of the timeframe requirement will allow students to be eligible for an EEA award at any time.

Recommendation (pg. 71): The Financial Assistance Advisory Committee (FAAC) should provide guidance to local school boards to include information on MDCAPS along with the FAFSA/MSFAA outreach required by Chapter 577 of 2021.

The FAFSA Completion Initiative (FCI), which includes certain components administered by FAAC is currently completing this recommendation.

Recommended Actions

1. Adopt the following narrative: Impact of Credit Completion Requirement on Financial Aid Awards: The committees are interested in the impact the 30-credit-hour requirement had on students in the 2022-2023 academic year and the 2023-2024 awarding year, specifically if students are meeting the requirement in order to receive the full amount of award, how many students had their awards prorated, and how many students lost eligibility. The report should also include the graduation rates of students who completed 30 credit hours compared to those who completed less than 30 credit hours. The report should provide summary data by segment (community colleges, four-year public, and independent institutions) and by institution. The report should also identify how the Maryland Higher Education Commission (MHEC) alerts Educational Excellence Award (EEA) recipients that they are in danger of losing their award, as all segments are showing signs of increasing populations of students not meeting the 24-credit hour minimum. The report should identify the updated funding disbursement, by EEA award type and by total credit attainment grouping, for the students from the most recent review cycle as well as what the total funding amount was, by EEA award type, prior to those students having their award funding amounts revised.

Information Request	Author	Due Date
Report on impact of credit completion requirement on financial aid awards	MHEC	December 11, 2023

MHEC Response: MHEC's Office of Research and Policy Analysis (ORPA) is best positioned within the agency to perform analysis on the effects of the credit completion requirements. Yet, the ORPA cannot perform the request as outlined in the reporting requirement for the 2022-23 academic year due to the nature of the policy and the timing of the credit completion requirement. Students entering college in 2022-2023 who receive the EEA will not have not been impacted by the credit completion requirements because the credit completion requirement is tied to the 2nd renewal/their 3rd award. MHEC would need to wait until the students' third awards (second renewals) to study the effect of the policy. MHEC's Office of Research and Policy Analysis can provide an analysis of the effects of the study on earlier academic years, specifically students entering college between AY 2016-17 and AY 2019-20.

Tracking the graduation rate of students who completed 30 credit hours compared to those who completed fewer than 30 credit hours cannot provide information on the effectiveness of the credit completion policy. Analysis has shown that students who earned more than 30 credits annually have a higher graduation rate than their counterparts who did not earn 30 credits, with or without a credit completion policy.

2. Adopt the following narrative: Next Generation Scholars (NGS) Postsecondary

Outcomes: The 2020-2021 academic year was the first academic year with a cohort of grade 12 students in the NGS program. The committees remain interested in determining how many NGS students met the eligibility requirements and later enrolled in a postsecondary institution. The report should identify the number of NGS seniors for the 2021-2022 and 2022-2023 academic years, the number of NGS seniors who successfully met all of the eligibility requirements, the number of eligible NGS seniors receiving a guaranteed access award, and the number of seniors who later enrolled in a postsecondary institution of higher education in either the summer session or the fall semester and identify to which higher education segment those students enrolled.

Information Request	Author	Due Date
Report on postsecondary outcomes for NGS senior students	Maryland Higher Education Commission	December 1, 2023

MHEC Response: MHEC concurs with the recommended action.