

**SC National Guard College Assistance Program (SCNG CAP)
Review/Evaluation Committee Meeting
Main Conference Room
February 16, 2016
10:00 a.m.**

SC Army National Guard

Lt. Colonel Sean Egnew

Guests

Ms. Julie Frick, USC Columbia

Dr. Jennifer Settlemyer, Commissioner

Institutional Representatives

Mr. Jeff Dennis, Greenville Technical College

Ms. Kim Ellisor, Francis Marion University

Ms. Cindy Peachey, USC Columbia

CHE Staff

Ms. Lorinda Copeland

Dr. Karen Woodfaulk

1. Introductions and Approval of Minutes

Introductions were made by everyone in attendance. Dr. Karen Woodfaulk asked for a motion to approve the minutes from the October 21, 2015, meeting. The motion was made (Egnew) and seconded (Peachey) to accept the minutes as written. The minutes were accepted as written.

2. SCNG CAP Application Window 2016-2017 – Update

- Early and Late Awards

Dr. Woodfaulk stated the recruitment efforts of the Air and Army Guard were discussed during the last meeting. It was anticipated there would be 600 eligible members for academic year 2015-16, but the number exceeded 1,000. Due to limited funding, there was concern that all eligible members would not be funded. Expenditures were budgeted at \$2 million for fall and \$2 million for spring. The fall awards did not reach \$2 million. Therefore, the budget should meet every recipient's request for spring and summer.

There was discussion about an early and a late awards process similar to the Palmetto Fellows Scholarship program. Members who submit their applications early will be notified that they will receive funding. Members who submit their applications late will be notified that funding might not be available. Instead of an early and a late awards process, the Army Guard suggested the approval email language be revised so members understand that awards are contingent upon General Assembly and institutional approval.

During the last application window, there were members who had not completed the required training. Dr. Woodfaulk stated the concern was that members who had not completed the required training could receive eligibility ahead of a member that had completed the required training. Lt. Colonel Egnew responded that concessions were made during the last application window for members who were going to complete training after the application deadline. These members were coded eligible in the database before training was completed. Lt. Colonel Egnew stated this would not happen again. Dr. Woodfaulk stated moving forward only members who have completed the required training will be coded eligible. Members who have not completed the required training can apply during the next application window.

Dr. Woodfaulk stated CW2 Deborah Glenn was planning to revise the approval email language for the Army Guard. Lt. Colonel Egnew responded that he anticipated using the same approval language that his predecessor used which was clear, concise, and had no ambiguity. Ms. Lorinda Copeland responded that the clarification was going to be that the approval was for Guard eligibility and that the member still has to receive institutional eligibility. Lt. Colonel Egnew stated he would review their approval email.

Dr. Woodfaulk asked if there were questions regarding the application window and asked the institutional representatives how things were going. Ms. Peachey responded the application window was fine but students needed to know that their institution and others are implementing earlier fee deadlines. Ms. Peachey stated their institution does not award CAP until August 1st. There is concern that CAP funds may not be awarded by the fee deadline and that members will have to be reimbursed. Ms. Peachey stated there is not ample time between receiving the list of eligible students and the fee deadline. Each student has to be manually reviewed due to the 130 hour maximum. Dr. Woodfaulk stated this also occurs with the scholarship late awards process. Ms. Peachey responded that with their Palmetto Fellows Scholarship students, she generates a report and the funds are awarded. However, the 130 hours for CAP students has to be manually processed. Ms. Kim Ellisor stated her institution has an extended fee deadline. Their CAP students are placed under the extended deadline with the hope that funds will be awarded by the deadline. Ms. Ellisor has not had any problems with their CAP students and the extended deadline and agrees the process is manual. Mr. Jeff Dennis stated he is not experiencing any of these issues due to the fact that his institution is a technical college and due to their disbursement schedule. Dr. Woodfaulk stated we do not want a member to be dropped from their classes and suggested the approval email also state that a member may have to be reimbursed due to their institution's fee payment deadline.

Dr. Woodfaulk stated there had been discussion regarding extending the application window, but there was no indication from the Guard that the window needed to be extended. Lt. Colonel Egnew responded the deadline should be August 1st. However, the window can open as early as March. Ms. Peachey responded there is no reason to extend the application window because June 1st allows determination for summer eligibility. Ms. Peachey stated USC Columbia will add additional steps to close the gap because their summer term has not ended by the August 1st deadline. There was an issue with a student who took 12 hours during the summer which took the member over the 130 hour maximum.

3. Initial Eligibility (130 attempted hours)

- Section 62-252 B. of the SCNG CAP Regulations

- Initial Eligibility Date

- Beginning of Academic Year

Dr. Woodfaulk asked if a student earns credit toward their 130 hour maximum if they take a class during the summer immediately after initial approval for CAP awards. The initial eligibility date processed during the summer is for the upcoming academic year. Dr. Jennifer Settlemeyer stated the regulations state academic year. Dr. Woodfaulk responded that the term "academic year" is not reflected in section 62-252 B of the SCNG CAP Regulations. Dr. Woodfaulk stated we do not want to penalize the member for taking a class during the summer. The clock could start at the beginning of the academic year which is the fall term. Dr. Woodfaulk fears a student who receives eligibility during the summer is having summer hours included in the 130 hour maximum. Dr. Woodfaulk asked the institutional representatives if

they are determining students to be eligible in the fall or at the initial eligibility date which is the application/processing date.

Lt. Colonel Egnew responded he had an opinion which he did not think was in line with the current process. If the member is not eligible until the completion of Basic Combat & AIT training, then the initial eligibility date should be consistent with GI Bill procedures which is the completion of Basic Combat & AIT training plus one day. The completion of Basic Combat & AIT training plus one day would be the initial eligibility date regardless of when CAP is started. Dr. Woodfaulk stated if a member has completed Basic & AIT training, and has an application/processing date of June 1st, the fall term is the first time hours should be counted. Lt. Colonel Egnew responded he understood Dr. Woodfaulk's view point because the completion of Basic Combat & AIT plus one day eligibility date would count hours before a member enters the CAP program.

Dr. Settlemyer stated she thought the 130 hour maximum is cumulative towards the degree. Ms. Peachey responded the 130 hour maximum is not cumulative towards the degree. The 130 hours starts with the eligibility date and if the student takes a class during the summer it counts towards the 130 hour maximum. Dr. Settlemyer stated the 130 hour maximum is defined as cumulative in the SCNP CAP Regulations. Ms. Peachey responded cumulative is not the interpretation and that the 130 hour maximum has changed several times (130 hours regardless of the eligibility date, students could appeal if over 130 hours, and attempted hours which made the process manual and prone to errors). Dr. Settlemyer stated she did not know when the change occurred because from the beginning the 130 hour maximum was cumulative. Ms. Lorinda Copeland responded the 130 cumulative hours was during the time Dr. Settlemyer was the Education Services Officer with the Army Guard. The change occurred with leadership beyond the Education Services Office and currently the clock starts with the eligibility date. Ms. Copeland also stated the mindset was if a member is progressing, the member will probably graduate before reaching the \$18,000 maximum.

Ms. Peachey stated that all students are not graduating after the 130 hours. If students take classes in the military, these classes may not count towards the degree at USC Columbia. Ms. Peachey thinks the process changed when students reached the 130 hour maximum but could be approved by an appeal. Ms. Peachey stated the clock should start when the member becomes eligible for CAP. Dr. Woodfaulk stated her interpretation when she came aboard was that the 130 hours is from the time of initial eligibility. Dr. Woodfaulk stated a member needing more than 130 hours to graduate is a concern. Ms. Ellisor stated she has had two students to reach the 130 hour maximum and had a semester remaining. These students did not question her and did not appeal.

Dr. Woodfaulk stated the regulations would have to be changed or language could be disseminated to clarify intent. The question is whether the 130 hours are cumulative from the time of initial eligibility. Ms. Peachey responded the determination would be the Guard's decision. Lt. Colonel Egnew responded he would like to eliminate the 130 hour maximum which should not be an issue because there is an \$18,000 maximum. Ms. Ellisor agreed with eliminating the 130 hour maximum. Ms. Peachey stated she could also agree with the suggestion. Lt. Colonel Egnew stated if an eligibility date cannot be agreed upon, how complicated would it be going forward to determine the 130 hour maximum. Lt. Colonel Egnew stated he knows it would be a regulatory change. However, Federal Tuition Assistance also limits members to a 130 hour maximum. Lt. Colonel Egnew stated he attended the Citadel and it is easy to exceed the 130 hour maximum which he thinks should be eliminated. Ms. Peachey stated if USC Columbia was not having to calculate hours, CAP could be awarded with no

problem. Ms. Peachey stated they will communicate to their students processes that are in place. These processes will help eliminate awarding students who may have reached the 130 hours because they took classes at another institution. Ms. Peachey stated her institution cannot continue covering students with institutional funds.

Dr. Settlemyer stated initially CAP was administered consistent with the Federal Tuition Assistance guidelines. The intent was due to students who may be “career” students, wanting to be a steward of resources, and to be mutually beneficial for the institutions and the National Guard. SAP was included to prevent the student from earning so many hours, but not performing well academically, and yet still receiving the funds. Dr. Settlemyer stated the Commission is having discussions regarding student success and wants programs that will allow students to obtain the degree needed to gain employment. Dr. Settlemyer stated if criteria is in place that is only effecting a small percentage of students in the program, is it worth having the 130 hour maximum. Dr. Woodfaulk stated the student still has to meet the institution’s eligibility requirements. Ms. Peachey responded SAP is a federal requirement and USC Columbia has Palmetto Fellows Scholarship students who have more than 130 hours and are receiving the scholarship because they have not met the 8 semester requirement.

Ms. Ellisor asked if the 130 hours was cumulative, although easier on the institution, would this hurt the student. Some students have been enrolled before an eligibility date was established. Dr. Woodfaulk responded if a student exceeds the 130 hours, the student can appeal to the Guard. Lt. Colonel Egnew stated he would review the appeals process and determine why the 130 hour maximum was included. Ms. Peachey stated a student can exceed the 130 hour maximum easily if the student changes their major. Ms. Ellisor stated if the 130 hour maximum is maintained, it would be helpful if the uploaded file for CAP eligible students has a column to capture the hours. Ms. Copeland responded she would speak with CHE’s Chief Information Officer because there have been previous discussions as to why this information is not captured. Ms. Peachey stated the institutions are required to list the credit hours for each student on the invoice. Ms. Copeland responded she currently cannot enter the credit hours into the CAP database.

Dr. Woodfaulk stated there are students who are enrolled under the current interpretation Of 130 credit hours from the date of initial eligibility. If the new interpretation is implemented, it would have to be phased in because we cannot have some members under one process and others under another. Dr. Woodfaulk stated the effective date of the new language would be after the regulatory process which may take 1 -2 years. Lt. Colonel Egnew asked to table the discussion. Ms. Peachey did not think a decision could be made during the meeting but she would like for the Guard to revisit the initial process and the current process. The current process of counting the 130 from initial eligibility date or, 130 total hours and not having to count from an eligibility date which is a manual process. Mr. Dennis asked why there would be two groups. Dr. Woodfaulk responded some students may be harmed automatically because they may have hours which may not have been counted because the initial date of eligibility was used. Ms. Julie Frick asked what the final determination was regarding a summer initial eligibility date and the clock starting with this date. Dr. Woodfaulk responded most institutions are looking at the initial eligibility date and there is nothing in the regulations to prevent using the initial eligibility date. Dr. Woodfaulk stated we will wait for the Guard to let us know if there will be a change.

4. Prorated Awards for Less Than Full-Time Students (Pell Grant Model) - Section 62-252 G. of the SCNG CAP Regulations

Dr. Woodfaulk stated that it is CHE staff's understanding from institutions that awards are not prorated for enrollment less than $\frac{1}{4}$ time. Dr. Woodfaulk asked if the Pell Grant can be prorated for enrollment less than $\frac{1}{4}$ time using the Pell Grant methodology. Mr. Dennis responded there are four Pell Grant calculations (full time, $\frac{3}{4}$ time, $\frac{1}{2}$ time, and less than $\frac{1}{2}$ time). Ms. Ellisor stated a Pell Grant can be awarded for one hour which typically does not happen because a course is usually three hours. Dr. Woodfaulk responded an award for one hour is less than $\frac{1}{4}$ time. Ms. Ellisor responded yes. Dr. Woodfaulk asked if the less than $\frac{1}{2}$ time proration was a concern. An institution communicated they do not award less than $\frac{1}{4}$ time based on the Pell Grant methodology. Mr. Dennis stated if the Expected Family Contribution (EFC) is high enough, a student may not receive a Pell Grant for less than $\frac{1}{2}$ time. Mr. Dennis thought a percentage was used for the model, not actual numbers for the EFC. Ms. Peachey stated the EFC determines if the student can receive a $\frac{1}{2}$ time or less than $\frac{1}{2}$ time award. Dr. Woodfaulk asked if the Pell Grant methodology allows for less than $\frac{1}{4}$ time. Ms. Peachey responded the methodology states less than $\frac{1}{2}$ time. An institution stated at their institution they do not calculate less than $\frac{1}{4}$ time. Dr. Woodfaulk asked if the Pell Grant model, which allows for a less than $\frac{1}{2}$ time proration, which would include less than $\frac{1}{4}$ time, an issue. Ms. Peachey stated a student can be awarded for one hour and the issue is probably how many institutions have awarded for one hour. Ms. Peachey stated a course is usually three hours.

Ms. Frick stated their institution ran into the issue when the student was close to the 130 hour maximum. There were two students who had earned 128 credit hours and were not awarded the two additional hours of funding due to their interpretation of the regulations. Dr. Woodfaulk stated if a student has 128 credit hours, the award can be prorated for less than $\frac{1}{4}$ time. Mr. Dennis stated his interpretation would have been to award the student until the 130 hours had been exceeded. Ms. Peachey responded they had done that previously and had to recoup funds. Ms. Peachey stated the issue is how many hours up to the 130 is the student eligible. Once the 130 hours are clarified, CHE needs to clarify prorating the award. Dr. Settlemyer stated initially schools did not communicate and asked if communication was better. Ms. Peachey responded if a student is state scholarship and grant eligible, the student is required to send all transcripts to all institutions. However, there is nothing to guarantee this has been done because some students will notify an institution only if it will benefit them. Dr. Settlemyer asked if CHE was better at collecting and if online transcripts were implemented. Ms. Copeland responded discussion may have occurred but online transcripts were not in place. Dr. Woodfaulk stated it did not appear to be a problem prorating awards using the Pell Grant methodology. Mr. Dennis asked Ms. Peachey if she was calculating $\frac{2}{12}$ or less than $\frac{1}{2}$ time for the students who had 128 hours. Ms. Peachey responded they did not award the students because the students did not have three hours of eligibility. CHE notified them that the students were eligible for two hours of funding. Ms. Copeland stated that the concern is whether the award should be $\frac{1}{4}$ time or less than $\frac{1}{4}$ time.

5. Graduation Data (SCNG CAP Program Evaluation)

A program evaluation for CAP was discussed during the last meeting. However, determining an on-time graduation rate may be an issue because members can start and stop enrollment. Dr. Woodfaulk asked the institutional representatives if graduation data could be collected to reflect program success. Ms. Peachey responded graduation data would be an additional report. When their disbursement report is submitted, the institution would not know at that time if the student has graduated. Dr. Settlemyer responded graduation data was a

requirement when CAP was implemented because CAP only funds an undergraduate degree. Graduation data was to be collected by the SC National Guard because CAP was not the only program for its members and the Army Guard wanted to know when the member exited the program with a degree. Ms. Peachey stated one problem with collecting graduation data is that an Air Guard student may use their funding in two years and will no longer be tracked. Ms. Peachey can provide the graduation status of current students, but cannot collect data for students who no longer have eligibility. Dr. Woodfaulk stated we should know if the Air Guard student graduated from their program. Although members start and stop enrollment along with other variables, the goal is to show the number of students who have graduated from the program. Dr. Woodfaulk would like an evaluation tool demonstrating the program is successful. The program is receiving millions of dollars in funding and there should be an evaluation to show Air and Army Guard members use the funds and graduate.

Dr. Woodfaulk stated an additional column could be added to the database to capture the graduation date. In addition to the eligibility date, there would be a graduation date. Dr. Woodfaulk asked Lt. Colonel Egnew if the Army Guard collects graduation data. Lt. Colonel Egnew responded the civilian education level is updated when the member provides an update. Officers are more prone to provide an update of their civilian education versus a Non Commissioned Officer (NCO) because of the impact on their career. Updating their civilian education helps the NCO. However, the NCO does not always provide an update. Lt. Colonel Egnew will update a member to an ineligible status as necessary when he receives a transcript. Lt. Colonel Egnew stated that he does not have a methodology to collect graduation data. Lt. Colonel Egnew stated that he understands Ms. Peachey's concern regarding the Air Guard data because the graduation data could be skewed. Lt. Colonel Egnew asked if the members would be grouped in cohorts. Ms. Peachey responded the students are not in cohorts. Lt. Colonel Egnew stated the collection of graduation data is doable, but the collection would be a tremendous amount of work for someone.

Dr. Settlemyer stated showing success by the members who have graduated is one component. The other component is comparison to peers who did not receive additional funding and how this will show success. Dr. Settlemyer stated there would probably be similarities with CAP and typical graduation rates. Dr. Woodfaulk stated during the last discussion regarding graduation rates, the issue was cohorts and on time graduation. Funding for Air Guard members is typically two years and funding for Army Guard members is typically four years. Perhaps a column could be added to indicate when a student graduated.

Ms. Peachey stated institutions are reporting graduation data to CHE and asked if identifiers are reported. If identifiers are reported, a true picture could be obtained. If identifiers are not reported, the data would be skewed. Ms. Peachey stated that she could report in May which CAP students graduated. This reporting is done for the Palmetto Fellows Scholarship for a cohort of students. If the student loses their Palmetto Fellows Scholarship eligibility, they are no longer tracked. Dr. Woodfaulk will speak with Ms. Camille Brown of CHE to inquire whether identifiers are collected. Dr. Settlemyer found this interesting as a taxpayer. Dr. Settlemyer thinks graduation rates should be known because we know the name of recipients. If identifiers are captured for CAP students, we would know when the member enters the program and when the member graduates. Dr. Woodfaulk stated the additional column in the database for the graduation date should not compare the member with a cohort. The data captured from the additional column would allow for the graduation date to be reported. Dr. Woodfaulk asked the Committee to think about a process to evaluate the program if it is not using the graduation rate. Dr. Woodfaulk knows the program is successful but we should have data to demonstrate it's success.

6. SC National Guard College Assistance Program Regulations

- **To Be Published in the State Register 2/26/16**

- **Federal Student Loan Default Language Removed**

Dr. Woodfaulk stated the SC National Guard College Assistance Program Regulations will be published in the State Register on February 26, 2016. Dr. Woodfaulk noted that with other state scholarship and grant programs, a student cannot receive the scholarship if he/she is in default of a federal student loan. However, students can receive CAP if they are in default of a federal student loan.

7. Other Business, Comments, or Concerns

Dr. Woodfaulk asked the institutional representatives if there were issues or concerns regarding the CAP program. Mr. Dennis and Ms. Ellisor responded they did not have any issues or concerns.

Ms. Copeland will contact the Committee members to schedule the next meeting.

Respectfully submitted,

Lorinda Copeland
Recording Secretary