



February 5, 2021

Ms. Vanecia Kerr, Chairperson
Colorado Commission on Higher Education
c/o Colorado Department of Higher Education
1600 Broadway, Suite 2200
Denver, CO 80202

RE: Response to Invitation to Prepare a CCHE Policy Innovation for Financial Aid

Dear Chair Kerr and Executive Director Paccione,

Pursuant to the invitation extended to Colorado Mountain College and the Colorado Community College System on November 9, 2020 concerning the development of “innovation” procedures to allow concurrent enrollment students with demonstrated financial need to benefit from state need-based financial aid, enclosed are (a) responses to questions posed by the CCHE concerning the proposed innovation as well as (b) a draft policy, modeled on the existing CCHE financial aid allocation policy (CCHE Policy VI:F) and co-developed by financial aid and concurrent enrollment directors at CMC and the CCCS.

The enclosed proposed policy answers many of the questions presented in the CCHE innovation policy. However, answers to other questions appear below.

1. *Proposed length of innovation (including start and end dates):*

Colorado Mountain College and the Colorado Community College System (hereafter “the applicants”) propose to pilot the enclosed financial aid policy for a period of two fiscal years, from July 1, 2021 to June 30, 2023.

2. ***Proposed data collection and evaluation process:***

The applicants propose to gather the following data concerning the pilot program: academic, demographic, and financial information of participating concurrent enrollment students; complete information about the academic and enrollment profiles of participating high schools and districts; award amount per student, by school, and by college campus; academic performance of participating students; longitudinal information concerning the program participants' academic and post-high school outcomes. These data will be gathered by the applicants in collaboration with the Department of Higher Education, as necessary.

3. ***Assurances that proposed innovation does not violate current state or federal law and is in compliance with all relevant governing board policies (proposals that require legislative action may be considered, but will require additional review)***

The applicants are unaware of any federal laws that prohibit states from allocating need-based financial assistance to concurrent enrollment students. In fact, current ESSA law explicitly permits high schools to use federal Title I funds for concurrent enrollment tuition, books, and fees. At the state level, the applicants believe the proposed plan conforms to extant law, as funding is awarded to students based on demonstrated need. The financial benefit is awarded to students who are considered both college and high school students under the Concurrent Enrollment Programs Act. Moreover, the funds would be used to support students' unmet needs and would be used like other external grant aid for school supplies and materials, which is permitted under current law. If approved by the CCHE, the applicants are willing to submit the proposed policy to the Office of the Colorado Attorney General for its review and opinion.

4. ***Assurances that the proposed innovation will not negatively impact student success (e.g., time to degree, ability to transfer, detrimental effects on financial aid eligibility, Student Bill of Rights).***

The proposed rules would likely dramatically expand student access and success, as direct costs for college textbooks and materials are not funded under current law. This expanded access would specifically target low income students who remain underrepresented in both concurrent enrollment and post-secondary participation, as recognized in the state's Higher Education Master Plan. The proposed plan could reduce the overall amount of financial aid available to enrolled students at a participating college, but this effect is already commonplace in higher education. That is, under current law and practice, colleges in Colorado receive a flat financial aid allocation from the CCHE, which is to be awarded by colleges to enrolled students. If, in a particular year, the number of enrolled students exceeds expectations, the college is expected to adjust its awarding practices accordingly to accommodate increased

demand. Nonetheless, the applicants are confident that, given the award limits under the proposed policy, impacts on enrolled students would be minimal.

We are grateful for the invitation to present this proposed policy for consideration by the Colorado Commission on Higher Education and look forward to working with the commissioners and Department staff to implement this ground-breaking, first-in-the-nation policy.

Sincerely,



Joe Garcia
Chancellor
Colorado Community College System



Carrie Besnette Hauser
President & CEO
Colorado Mountain College

CC: Matt Gianneschi, Chief Operating Officer, CMC
Landon K. Pirus, Vice Chancellor, CCCS
Beth Bean, Office of Governor Jared Polis
Allie Kimmel, Office of Governor Jared Polis
Ben Boggs, Colorado Department of Higher Education
Jason Schrock, Colorado Department of Higher Education
Kim Poast, Colorado Department of Higher Education
Julie McCluskie, State Representative
Bob Rankin, State Senator
CMC Board of Trustees
State Board for Community Colleges and Occupational Education

Draft: February 5, 2021

Proposed Policy Amendment to CCHE Policy VI:F

Financial Aid for Concurrent Enrollment Students

1.00 Introduction

This amendment to CCHE policy VI:F (State Financial Aid) and creates framework for public higher education institutions of higher education to award need-based financial aid to high school students participating in concurrent enrollment programs as defined in 22-35-101 (6)(a) C.R.S. This amendment is permissive and is intended to allow eligible colleges and universities to elect to use a portion of the need-based grant aid they receive from the state to offset direct costs of enrollment

This policy amendment will be effective on or after July 1, 2021 and shall remain in force until such time that it is amended, withdrawn, or replaced by official action from the Commission.

2.00 Authority

C.R.S. 23-1-108(1). The commission, after consultation with governing boards of institutions and as a part of the master planning process, shall have the authority to: (a) Establish a policy based and continuing system-wide planning, programming and coordination process to effect the best use of available resources;”

Statutory authority for the Colorado Student Grant program is found in 23-3.3-501, C.R.S.:

The Commission shall use a portion of any moneys remaining after meeting the requirements of parts 2 and 3 of this article to provide other programs of financial assistance based upon financial need, merit, talent, or other criteria established by the Commission for students enrolled at institutions.

3.00 Goals, Principles and Definitions

3.01 Policy Goals for State-Supported Financial Aid

CCHE’s Financial Aid Policy is designed to facilitate access for Colorado residents and provide academic incentives that promote greater access and academic achievement in college. This

proposed procedure expands upon this goal by providing state resources to cover expenses not otherwise covered by the Concurrent Enrollment Programs Act.

3.02 Principles

3.02.01 High school financial aid should afford resources necessary to allow concurrent enrollment students with demonstrated financial need to earn college credits without direct, out-of-pocket expenses.

3.02.02 The Colorado constitution requires that education at the K-12 level be a “thorough and uniform system of free public schools throughout the state, wherein all residents of the state, between the ages of six and twenty-one years, may be educated gratuitously.” Therefore, need-based financial aid for high school concurrent enrollment students aligns with the expressed goals of the state constitution.

3.02.03 The state and the institutions, including participating high schools, are co-responsible for ensuring student access to higher education. The state’s role is to provide leadership – by defining the operating values, specifying the statewide goals, and allocating the funds. The institutions—colleges and high schools—are responsible for creating policies and programs that meet the statewide policy goals by developing the procedures, administering the programs, and making the appropriate decisions to assist individual students in achieving their educational goals.

3.02.04 State financial aid need-based dollars should be directed toward the students with the least ability to pay the cost of higher education.

3.03 Definitions

Award Year begins July 1 and ends June 30. All funds appropriated for a particular fiscal year are awarded to students enrolled during the award year.

Eligible Student is a student who is enrolled in a concurrent enrollment program as defined by 22-35-101 and has demonstrated financial need. Students enrolled in dual enrollment, AP/IB, or dual credit programs ineligible for the College Opportunity Fund or state grant funding are not considered eligible students. Eligible high school concurrent enrollment students may receive need-based financial aid for any college credits for which the student is enrolled. Minimum credit hours shall not apply to concurrent enrollment students.

Demonstrated Need for high school concurrent enrollment students shall be determined by the student's participation in Free or Reduced Lunch programs (Title I), classification as 'independent student' such as in foster care, in state custody or 'homeless', pursuant to Colorado Department of Education guidelines, or professional judgement from a financial aid administrator. When professional judgement is exercised, the student's high school counselor must sign an affidavit certifying the reliability of the evidence used in determining the students' financial need.

Professional Judgment within the State of Colorado aid programs is the authority delegated to the Colorado financial aid administrators to exercise judgment in special circumstances when a student has substantively met the state eligibility parameters but circumstances beyond the student's control make the student technically ineligible for state financial aid. The state relies on the financial aid administrator to make such decisions that are in the best academic interest of the student. Because professional discretion provides limited flexibility to be exercised only in special circumstances, the financial aid administrator is solely responsible for ruling on the exception and the decision will be based on the affidavit submitted by the high school counselor.

Cost of Attendance in the context of concurrent enrollment programs includes only those costs directly associated with college enrollment but not otherwise covered by participating high schools or college subsidies, either state or local or both. These costs include books and supplies, fees, and transportation. Costs of attendance for concurrent enrollment students excludes tuition and room and board.

Eligible Institution is an educational institution operating in Colorado, which meets requirements, specified in 23-3.3-101, C.R.S., and can document that it has a governance structure and institutional capability to administer a student aid program.

4.00 Allocation Method

Eligible high school students may be receive need-based financial assistance in the form of Colorado Student Grants, Colorado Opportunity Scholarship Initiative grants, or institutional aid.

Eligible colleges and universities shall allocate need-based financial aid funds to participating eligible high schools in accordance with the procedures found in section 5.00 below. Eligible high schools must agree to adhere to the official business practices adopted by the Board of Directors of the Local Education Agency and provide an auditable record of all awards to the eligible college of university from which it received the initial allocation.

5.00 Procedures

- (1) On or before February 1 in a given year, participating high school will submit names of eligible concurrent enrollment students to the eligible college or university with which the school has a cooperative agreement for concurrent enrollment programs in the proceeding academic year.
- (2) On or before April 1 of the year in which the names of eligible concurrent enrollment students are provided by participating high schools, eligible colleges or universities may award need-based financial aid funds to participating high schools on behalf of eligible concurrent enrollment students.
- (3) Eligible colleges and universities may award funds for eligible students' books and supplies, fees, and transportation. Award amounts will follow official guidelines adopted by the college or university, but shall not exceed the CDHE upper budget limit for Books and Supplies. CCHE approves fiscal year student budget parameters annually for the upcoming aid year. The maximum annual budget amount for the 2021-2022 aid year is \$1,460.
 - a. In no instance shall funds be awarded directly to students. Participating eligible school districts may purchase books and supplies, personal expenses, or transportation (transit) services on behalf of eligible students or reimburse students for such expenses pursuant to the official business procedures in the local education agency.
- (4) By May 1 of each year following the original award, participating high schools must return all unused or unencumbered funds held by the participating high school to the participating college or university that had awarded the funds.
 - a. Note: Participating high schools may encumber funds on behalf of eligible students registered for eligible concurrent enrollment courses that will commence in the summer academic term.

First & Last Name	Job title	Institution	Email address	Proposed start d	Proposed end da
Landon K. Pirius	Vice Chancellor	Colorado Community Col	landon.pirius@cccs.edu	7/1/2021	6/30/2023

Overview of proposed innovation (paragraph description):	Specific policy name and number to which the innovation is aligned (and statutory reference, if applicable):	Goals the policy innovation is intended to address (including alignment with the State Master Plan for Colorado, benefits to the students, the institution, community, etc.):
<p>An amendment to CCHE policy VI:F (State Financial Aid) that creates framework for public higher education institutions of higher education to award need-based financial aid to high school students participating in concurrent enrollment programs as defined in 22-35-101 (6)(a) C.R.S. This amendment is permissive and is intended to allow eligible colleges and universities to elect to use a portion of the need-based grant aid they receive from the state to offset direct costs of enrollment.</p>	<p>CCHE policy VI:F (State Financial Aid)</p>	<p>The proposed rules would likely dramatically expand student access and success, as direct costs for college textbooks and materials are not funded under current law. This expanded access would specifically target low income students who remain underrepresented in both concurrent enrollment and post-secondary participation, as recognized in the state’s Higher Education Master Plan. The proposed plan could reduce the overall amount of financial aid available to enrolled students at a participating college, but this effect is already commonplace in higher education. That is, under current law and practice, colleges in Colorado receive a flat financial aid allocation from the CCHE, which is to be awarded by colleges to enrolled students. If, in a particular year, the number of enrolled students exceeds expectations, the college is expected to adjust its awarding practices accordingly to accommodate increased demand. Nonetheless, the applicants are confident that, given the award limits under the proposed policy, impacts on enrolled students would be minimal.</p>

What problem(s) is this innovation attempting to solve?	Existing research or evidence base for proposed innovation:	Proposed data collection and evaluation process:
<p>CCHE’s Financial Aid Policy is designed to facilitate access for Colorado residents and provide academic incentives that promote greater access and academic achievement in college. This proposed procedure expands upon this goal by providing state resources to cover expenses not otherwise covered by the Concurrent Enrollment Programs Act. 3.01 High school financial aid should afford resources necessary to allow concurrent enrollment students with demonstrated financial need to earn college credits without direct, out-of-pocket expenses. 3.02.02 The Colorado constitution requires that education at the K-12 level be a “thorough and uniform system of free public schools throughout the state, wherein all residents of the state, between the ages of six and twenty-one years, may be educated gratuitously.” Therefore, need-based financial aid for high school concurrent enrollment students aligns with the expressed goals of the state</p>	<p>CCHE’s Financial Aid Policy is designed to facilitate access for Colorado residents and provide academic incentives that promote greater access and academic achievement in college. This proposed procedure expands upon this goal by providing state resources to cover expenses not otherwise covered by the Concurrent Enrollment Programs Act.</p>	<p>The applicants propose to gather the following data concerning the pilot program: academic, demographic, and financial information of participating concurrent enrollment students; complete information about the academic and enrollment profiles of participating high schools and districts; award amount per student, by school, and by college campus; academic performance of participating students; longitudinal information concerning the program participants’ academic and post-high school outcomes. These data will be gathered by the applicants in collaboration with the Department of Higher Education, as necessary.</p>

Assurances that proposed innovation does not violate current state or federal law and is in compliance with all relevant governing board policies (proposals that require legislative action may be ...	Assurances that the proposed innovation will not negatively impact student success (e.g., time to degree, ability to transfer, detrimental effects on financial aid eligibility, Student Bill of Rig...	I have additional documentation to email to the CDHE for this proposal (is yes, email any additional documents critical to
<p>The applicants are unaware of any federal laws that prohibit states from allocating need-based financial assistance to concurrent enrollment students. In fact, current ESSA law explicitly permits high schools to use federal Title I funds for concurrent enrollment tuition, books, and fees. At the state level, the applicants believe the proposed plan conforms to extant law, as funding is awarded to students based on demonstrated need. The financial benefit is awarded to students who are considered both college and high school students under the Concurrent Enrollment Programs Act. Moreover, the funds would be used to support students' unmet needs and would be used like other external grant aid for school supplies and materials, which is permitted under current law. If approved by the CCHE, the applicants are willing to submit the proposed policy to the Office of the Colorado Attorney General for its review and opinion.</p>	<p>The proposed rules would likely dramatically expand student access and success, as direct costs for college textbooks and materials are not funded under current law. This expanded access would specifically target low income students who remain underrepresented in both concurrent enrollment and post-secondary participation, as recognized in the state's Higher Education Master Plan. The proposed plan could reduce the overall amount of financial aid available to enrolled students at a participating college, but this effect is already commonplace in higher education. That is, under current law and practice, colleges in Colorado receive a flat financial aid allocation from the CCHE, which is to be awarded by colleges to enrolled students. If, in a particular year, the number of enrolled students exceeds expectations, the college is expected to adjust its awarding practices accordingly to accommodate increased demand. Nonetheless, the applicants are confident that, given the award limits under the proposed policy, impacts on enrolled students would be minimal.</p>	<p>Yes</p>

Responses to CCHE Questions Concerning the Proposed Financial Aid Innovation Pilot

Prepared by Matt Gianneschi of Colorado Mountain College and Landon Pirius of the Colorado Community College System.

Date: April 28, 2021

1. Area 1: Scope & Fiscal Impact to Current/Future Students

- a. Please articulate how you will ensure that there will be no negative impacts to traditional undergraduates currently eligible for funds (since no additional monies will be added to current resources)?

Each year, there are more students eligible for state financial aid than there are resources available for allocation. Though our plan would add eligible students to the overall pool of potential beneficiaries, our plan would not change the fundamental discrepancy that already exists. In addition, under current rule, colleges and universities are allowed to create their own allocation plans at the campus level, prioritizing award amounts to certain students. Again, our plan would not change this practice, but would allow colleges to consider the advantages or disadvantages of applying funds toward one group of students or another, based on their expertise and knowledge of their students. Don't forget that most colleges have additional sources of aid from HEERF and many have foundations, resources from which can be used to offset/augment financial aid for traditional students (i.e., not those in high school).

- b. Please provide a per student estimate of funding that you anticipate allocating.

Allocations would be capped at the current statewide limit for books and instructional materials, approximately \$675.

- c. Please provide a total estimated expenditure that you anticipate for the innovation project.

This will depend from college to college. A reasonable estimate might be \$100,000 per college, per year.

- d. Are there other strategies (in addition to utilizing state financial aid) to address affordability with this innovation project that you intend to leverage to maximize student opportunities and minimize costs?

For years, access colleges throughout Colorado have applied a number of different strategies to reduce costs to students and K12 partners. These include investing foundation and other "extramural" sources of revenue, using digital or open source materials, waiving fees for concurrent enrollment students, coordinating the purchasing of required materials, and using K12 instructors for college-level courses.

- c. We recommend that the proposal limit the scope to specific district and/or school partners, rather than implementing a system wide strategy. Please identify districts and/or schools that you intend to partner with.

While we would support a limited approach to this program, our recommendation would be to restrict the total allocation by college, rather than by school district. In some districts, concurrent enrollment is not uniformly available to students based

on the preferences of building leaders (principals). We think a more effective strategy would be to place limitations on participating colleges, as this would force them to identify high priority populations at the school level, rather than the district level.

2. Area 2: Data, Analysis and Articulation of Specific Goals

b. Please detail the type of data you will be collecting throughout the project Specifically:

i. What data elements will you utilize to demonstrate success (course completion, credits earned, utilization of state dollars, demographics, etc.)?

As a rule, comprehensive data on concurrent enrollment participants are collected by enrolling colleges. These data parallel those gathered for “traditional” students, with the exception of tuition classification, including parents’ domicile and tax status, social security numbers, and, if provided, financial aid information. As a result, participating colleges will have near complete “SURDS” information on beneficiaries, which will allow for robust analyses on the impact of the pilot program, including the effect of aid use on course completion, enrollment intensity, grades, credit accumulation, persistence, time to degree, overall debt, and degree completion. Colleges will also be able to compare these outcomes across students, by type, and within and among high schools and different colleges. Also, because these data can be matched with those collected by CDE, participating colleges will also be able to isolate the effect of financial aid for concurrent enrollment on traditional “high school” indicators, such as graduation

ii. How will project outcomes will be assessed/measured?

See the information above. Participating institutions agree to prepare and publish annual reports concerning the effects of financial aid for concurrent enrollment students.

iii. What measures will this project utilize that indicate either a successful or unsuccessful implementation? How will you know this project is successful? What outcomes will help determine whether or not to continue the innovation?

Participating colleges have not prepared a comprehensive list of hypotheses to test, but, at a minimum, we expect to evaluate the extent to which financial aid for high school students increased concurrent enrollment participation, course intensity and type (i.e., courses with traditionally high “materials” costs), overall credit production, high school graduation, and college enrollment.

d. Please provide more detail regarding the number of students that you anticipate being eligible and/or impacted by this project.

The number of eligible students supported by the project will be determined to large degree by the limitations, if any, imposed by the CCHE. In general, we might anticipate serving 1 student for every \$200 allocated, per course, per term. So, an allocation of \$100,000 might reasonably be expected to support 500 students taking one course, or 250 students taking 2 courses, and so on.

e. Provide more specifics on measurable goals and metrics.

- i. For example, are goals to: grow concurrent enrollment? If so why and by how much? Save students money? How much? Expand access? To whom?

The primary purposes of this program are to (a) grow concurrent enrollment participation among low-income students (access) that may not have been able to benefit from such courses due to the costs of course materials, and (b) to create more equitable outcomes within high schools or across schools. Importantly, concurrent enrollment is hugely popular in Colorado, with more than 27% of all students earning college credit in high school (Community College Research Center, 2021). However, access to these courses is not equitable for low income populations. By allowing colleges to direct existing resources to high need students in high school, participating colleges expect to materially improve the state's goals of college access and completion, while reducing costs to the lowest income students in our K12 system.

e. Can the proposal detail specific populations that would benefit?

- i. What specific populations would benefit from this implementation? What populations would not benefit?

This program, if implemented, would allow the lowest income students in high schools—those eligible for free and reduced lunch programs—to increase their participation in college-level courses in high schools across the state.

- ii. How is this proposal pursuing equity?

In Colorado, high schools are required to pay concurrently enrolled students' tuition, but not their books or materials fees. At many institutions, book and materials fees far exceed the costs of tuition. For example, at Colorado Mountain College in Edwards, tuition for a 3-credit hour culinary arts course is \$270. The course fees for culinary arts at this campus range from \$50 to \$300 per course, per semester. The same is often true for, say, introductory biology (BIO 111), which has textbook costs of \$140 and course materials fees of \$40. These additional costs are not typically covered by high schools, resulting in inequitable access and program outcomes among the lowest income students. By providing existing financial aid to these students, the CCHE can enable colleges across the state to specifically reach high need populations and allow these students to pursue their academic dreams, regardless of program or degree type.