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November 16, 2018

Mr. Leroy Wade
Assistant Commissioner
Financial Assistance and Proprietary Certification
Missouri Department of Higher Education
P.O. Box 1469
Jefferson City, MO 65102

Dear Leroy:

While we appreciate the opportunity to submit comments on the draft recommendations on state student aid programs, we are disappointed with the recommendations presented that are unclear and detrimental to students who are low-income and students of color.

These recommendations are not fundamental changes, just a more complicated version of what exists. They fail to address the policy recommendations of the task force convened earlier this year which prioritized students with financial need and sought more equitable outcomes in state higher education.

Two overarching concerns comprise our response to the proposed Missouri First program.

1. Financial Need is Not the Driving Consideration

In contrast to the policy recommendations, financial need is relegated to one of multiple criteria for award eligibility – and only on some programs.

We suggest:

- Adding financial need as a criterion of all state aid programs, including the Early Awareness (revised A+) and Merit (Bright Flight) programs.
- Adjusting the income cap for eligibility to \$75,000. Students in income groups above \$75,000 have little to no unmet need unless they are attending very high cost schools. This is a more appropriate threshold for state aid consideration. \$150,000 AGI is a much too high ceiling, especially with increasing numbers qualifying and individual awards declining. A cap in award amount is insufficient; the awards should be driven by financial need.
- Clarifying what is meant by an “approved” institution and what is included in “all other aid”.
- Articulating the proposed budget for each program. If the expansion of

existing programs and addition of new components will be funded through existing resources, then resource allocation for need-based aid is likely to decrease.

2. Perpetuation of Inequities

While the policy task force recommendations sought to increase equity, the proposed Missouri First program instead perpetuates inequities.

Implicit bias exists throughout the recommendations (rewarding for parent compliance, rewarding for high test score, rewarding for attendance) that will not yield any more equitable outcomes in the new program than in the existing ones.

We suggest:

- Removing citizenship as a requirement.
- Emphasizing GPA over ACT score in awarding merit-based aid. While GPA has been added to the Merit structure for eligibility, the award amounts are still contingent on ACT score. The fact that you can receive the same award with a 27-31 ACT in the 3.5-3.9 GPA range as with ACT of 32-36 and GPA 3.0-3.49 is curious. The data indicate high GPA is a greater predictor of academic performance in college than ACT yet the incentive for state merit awards is still on ACT score.
- Removing any requirement for parental signature or involvement of parents or students in a “contract”.
- Allowing for a substitute or similar engagement (or better define) “tutoring/mentoring/community service/postsecondary preparation requirement”.
- Reducing the attendance goal OR account for contested suspensions and absences due to illness.
- Clarifying what is meant by “meets regularly with a mentor”, including who is a qualified mentor and how this will be verified.
- Clarifying what is meant by “high demand and/or high need” programs eligible for the Workforce Incentive scholarship.

While these suggestions are pointed, they are offered in the spirit of wanting to create the most impactful and most equitable state student aid program possible for Missouri. We would be happy to meet with you, members of the State Student Financial Aid Committee, or members of the Coordinating Board for Higher Education to discuss these ideas further.

Sincerely,

St. Louis Graduates Advocacy Committee

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