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Interim Project Report 2004-131

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Committee on Education

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REVIEW THE IMPACT AND IMPLEMENTATION OF THE ACCESS TO BETTER LEARNING AND EDUCATION (ABLE) GRANT PROGRAM

SUMMARY

The 2003 Legislature created the Access to Better Learning and Education (ABLE) Grant Program to provide tuition assistance for Florida resident, full-time, baccalaureate degree seeking students attending certain types of for-profit and nonprofit secular institutions. However, no funding was included for the Program in the fiscal year 2003-04 budget.

The interim project identifies institutions which may potentially participate in the program; estimates the potential number of qualifying students; provides a cost estimate for each institutional group; and recommends changes to the Florida Statutes which might be considered by the 2004 Legislature.

BACKGROUND

Florida has had two need-based student financial assistance programs and one non-need-based tuition assistance grant program which have targeted students attending private in-state postsecondary institutions. The two need-based programs are the Private Student Assistance Grant and the Postsecondary Student Assistance Grant Programs. The non-need-based program is the Florida Resident Assistance Grant. In addition, students receiving the Florida Bright Futures Scholarship may choose to attend nonpublic institutions in Florida.

Private Student Assistance Grants: Private Student Assistance Grants are need-based awards provided to full-time students of a baccalaureate-degree-granting independent nonprofit Florida college or university accredited by the Commission on Colleges of the Southern Association of Colleges and Schools (SACS), and located in and chartered as a domestic corporation by the state. A requirement for eligible students to attend a secular institution is not included. In the 2003-2004 Fiscal Year, \$10.7 million was appropriated for the program.

Postsecondary Student Assistance Grants: The Postsecondary Student Assistance Grant Program provides need-based financial assistance to full-time students accepted at a private postsecondary institution located in Florida; which is either a private nursing diploma school approved by the Florida Board of Nursing, or an institution licensed by the Commission for Independent Education. A requirement for eligible students to attend a secular institution is not included. In the 2003-2004 Fiscal Year, \$7.4 million was appropriated for the program.

Florida Resident Access Grants: The Florida Resident Access Grant (FRAG) Program offers access grants to resident students who attend private nonprofit colleges and universities. For Fiscal Year 2003-2004, the total funding for the FRAG Program in the General Appropriations Act was \$79,841,350. This amount was to support 35,468 students at \$2,251.08 per student. For the 2003-04 academic year, the Department of Education has identified 28 institutions as eligible to accept FRAG recipients.

To participate in FRAG, a student must be a full-time degree-seeking undergraduate student registered at an independent nonprofit college or university located in and chartered by the state. The institution must be accredited by the Commission on Colleges of the Southern Association of Colleges and Schools, grant baccalaureate degrees, may not be a state university or state community college, and have a secular purpose, so long as the receipt of state aid by students at the institution would not have the primary effect of advancing or impeding religion or result in an excessive entanglement between the state and any religious sect.

Currently, only one of the 28 FRAG institutions is registered to participate in the common course numbering system. However, that institution presently has no courses approved for inclusion in the system. There is an articulation agreement between the state's public community college system and, except for the University of Miami, all of the FRAG institutions. The agreement provides that FRAG institutions will accept the credits of community college students who transfer with an Associate in Arts degree. The agreement does not guarantee acceptance of credit for non-

degree holders transferring to a FRAG institution. The agreement does require the development of:

...course equivalency tables, specifically for program prerequisites and course requirements, insofar as it is reasonable and necessary to do so. Courses that are designated as equivalent must be treated as equivalent for all community colleges.¹

FRAG Student Eligibility Criteria: In addition to institutional criteria for participation in the tuition assistance program, students must also meet certain eligibility standards. These include: the student is in compliance with the general requirements and residency requirements of section 1009.40, Florida Statutes, is enrolled at an eligible institution as a full time undergraduate student, is not enrolled in a program of study leading to a degree in theology or divinity, and is making satisfactory academic progress as defined by the institution in which the student is enrolled.

Florida Bright Futures Scholarship Program: Students receiving a Florida Bright Futures Scholarship may choose to attend in-state institutions which meet a variety of requirements. Among the commonalities of the requirements for eligible non-public institutions are the institution: has operated in the state for at least 3 years; meets standards required to operate an institution in Florida as determined by rules of the Commission for Independent Education; is accredited by an agency recognized by the United States Department of Education; and, for some institutions, that the institution demonstrates a sound financial condition. A requirement for eligible students to attend a secular institution is not included.

The Access to Better Learning and Education (ABLE) Grant Program: The Access to Better Learning and Education Grant Program was enacted by the 2003 Legislature. The program targets students attending both for-profit and certain nonprofit institutions. The tuition assistance grant program is limited to Florida residents seeking a baccalaureate degree from a for-profit college or university accredited by the Commission on Colleges of the Southern Association of Colleges and Schools, granting baccalaureate degrees, located in and chartered by the state, and has a secular purpose, or: is a nonprofit college or university chartered out of the state, has been located in Florida for 10 or more years, is accredited by one of four Regional Accrediting Associations of Colleges and Schools identified in section 1009.891 (3), Florida Statutes, grants baccalaureate degrees, is not a state university or state community college, and has a secular purpose, so long as the receipt of state aid by students at the institution would not

have the primary effect of advancing or impeding religion or result in an excessive entanglement between the state and any religious sect.

Florida has not previously offered student tuition assistance grants to attend for-profit colleges and universities or to attend a nonprofit college or university that is chartered out of the state. As the ABLE law was initially drafted, students attending three institutions would have qualified: South University in West Palm Beach, Ai Miami International University of Art and Design, and Keiser College with 8 sites around the state. Keiser has not yet awarded any baccalaureate degrees, but has juniors and seniors in a baccalaureate degree program.

Of the approximately 400 full time students at South University, the number of Florida resident, full time students seeking a baccalaureate degree was estimated at 127 for the 2002-03 academic year. Of the approximately 3,000 full time students at Keiser College, the estimate was 64 full time baccalaureate degree seeking students of which 48 were Florida resident students. Of the approximately 1,300 full time students at Ai Miami International University of Art and Design, the estimate was 154 full time baccalaureate degree seeking Florida resident students. If these estimates were correct, at the current level of support for the Florida Resident Access Grant of \$2,686 per student, the cost to the state to implement the program in the 2002-03 academic year for 329 students would have been \$908,894.

As passed, the law includes certain additional nonprofit institutions which are accredited by one of four regional accrediting associations listed in the statutes. Those institutions currently offer baccalaureate degrees at 29 sites. No information was available on the potential number of students or cost at the time the law was approved.

Although no funds to implement the ABLE Grant Program were included in the 2003-04 General Appropriations Act, section 1009.891, Florida Statutes, provides that the total funding level and the grant amount per student are to be specified in each year's General Appropriations Act. The law further states that in the first year in which funds are appropriated, only students at the for-profit institutions would be eligible for funding. Students at nonprofit institutions would become eligible for funding in the second year in which funds are provided.

ABLE Student Eligibility Criteria: In addition to institutional criteria for participation in the tuition assistance program, students must also meet certain eligibility standards. These include: the student is in compliance with the general requirements and residency requirements of section 1009.40, Florida Statutes, is enrolled at an eligible institution as a full time student in a program leading to a baccalaureate degree, is not enrolled in a program of study leading to a degree in theology or divinity, and is making satisfactory academic progress as defined by the institution in which the student is enrolled. This criterion differs from

¹ 1. Draft of Updated Agreement for Review, Articulation Agreement between the Independent Colleges and Universities of Florida and the Florida State Board of Education, page 2, IV.

the FRAG language in that a student must be enrolled in a program leading to a baccalaureate degree, not just be a full-time undergraduate student.

Institutional Accreditation: As enacted, the ABLE program recognizes certain accrediting organizations but not others.

In general, there are three types of accrediting organizations: regional accrediting organizations, e.g., Southern Association of Colleges and Schools, (SACS), national accrediting organizations, e.g., Accrediting Council for Independent Colleges and Schools, (ACICS), and specialized/professional accrediting organizations, e.g., Commission on Collegiate Nursing Education, (CCNE).

Accrediting organizations serve two major purposes. The first is to allow an institution to participate in federal financial aid programs. Under current practice, only students attending an institution which is accredited by an agency recognized by the United States Department of Education may participate in or receive federal financial aid.

The second purpose is to have certain standards against which an institution is evaluated. An accredited institution has met the standards of the accrediting agency by which it chooses to be accredited. Standards vary by accrediting agency and usually reflect an emphasis on different eligibility criteria.

As of September, 2003, the United States Department of Education recognized 8 regional accrediting organizations, six of which are primarily for baccalaureate degree granting institutions, 6 national accrediting organizations, and 44 specialized/professional accrediting organizations. In turn, these organizations have granted accreditation to approximately 6,300 institutions and 17,500 programs.

Accrediting organizations have only recently begun to include performance or accountability measures which emphasize outcomes as opposed to inputs. The demand for this change has primarily come from the federal government and reflects the increased emphasis on accountability in government activities.

Transfer of Credit/Common Course Numbering: When a student transfers between institutions, the acceptance of credit earned at the first institution by the second institution is not guaranteed even if both institutions are accredited by the same accrediting organization. Most accrediting organizations leave the evaluation of the quality of a course, and the acceptance of transfer credit, to the receiving institution. Because of Florida's history of reliance on the community college system to provide the first two years of a baccalaureate degree, the state developed its own methodology to guarantee the transferability of credit earned at its public institutions. This approach is based on the Common Course Numbering procedure as described in Chapter 1007.24, Florida Statutes, and involves evaluating the content of each college level course and assigning a

common number to courses that have the same content. Students are guaranteed that courses with the same number will be accepted by all other public institutions that teach that course. The law allows accredited nonpublic colleges and schools to participate in the common course numbering system and, for those institutions choosing to participate, guarantees transferring students the acceptance of course credit toward a degree.

Nonprofit institutions may become participating members of the common course numbering system at no cost. For-profit institutions are charged a one time application fee of \$1,000 and thereafter, pay a yearly maintenance fee of \$1.00 per approved institutional course included in the common course numbering system. The charge to evaluate courses for inclusion is \$40.00 per course. An institution may be designated as an active participant, however, and not have any approved courses included in the common course numbering system. Currently, 31 private institutions participate but 16 of the institutions have fewer than 10 courses in the system.

A major reason to participate in the common course numbering system is the Florida Academic Counseling and Tracking System (FACTS) student advising system. For each degree offered by a participating institution, all required courses and options are listed. These courses are coded and interpreted by counselors and the computerized counseling system using the assigned common course number. Students attending or transferring between institutions that participate in the FACTS system can tell which courses must be taken to enter each degree program and are assured that the courses taken will be accepted at all participating institutions. This provides students a clear degree course outline, saving both the state and student unnecessary expense and time to degree.

The private institutions participating in the articulation agreement have developed manuals that provide course equivalency guidelines for transferring students but which are not integrated with the FACTS system.

Florida Residency for Tuition Purposes: Chapter 1009.40, Florida Statutes, identifies the basis for determining residency for tuition purposes. Recent studies by the Office of Program Policy Analysis and Government Accountability (OPPAGA) have found that institutions in both the public and private postsecondary sectors determine residency for tuition purposes in different ways. Residency determinations affect the amount of tuition and matriculation fees collected by an institution, affect student eligibility to participate in state funded financial aid programs, and also affect student eligibility to participate in tuition assistance programs. In public institutions, the less a student pays of the educational cost, the more the state pays.

Secular and non-secular institutions: Statutory language in both the Florida Resident Access Grant (FRAG) Program

and the Access to Better Learning and Education (ABLE) Grant Program requires participating institutions to have:

...a secular purpose, so long as the receipt of state aid by students at the institution would not have the primary effect of advancing or impeding religion or result in an excessive entanglement between the state and any religious sect.

In interpreting the statutory language, similar institutions offering secular degrees, e.g., elementary education, business administration, nursing, etc., have self-identified themselves as non-secular and, therefore have not participated in FRAG, and probably would not participate in ABLE. Others have self-identified as secular institutions and would participate in the programs even though they might clearly state in their catalogs an association with a religious group, or include a course in theology or religion within each degree's requirements.

Constitutional Provisions: Article 1, Section 3 of the Florida Constitution states:

No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution.

METHODOLOGY

Working in conjunction with the Commission for Independent Education and the Bureau of Student Financial Assistance, both of which are within the Florida Department of Education, a list of the private for-profit and nonprofit institutions offering baccalaureate degrees in Florida was developed. Information about each institution was compared to the criteria identified in statutory language for participation in the ABLE Grant Program. Other institutions were identified which would have met criteria contained in any of three floor amendments offered during the 2003 regular Legislative Session, each of which were withdrawn from consideration. The first amendment would have expanded the ABLE program to allow participation by students at any independent institution located in Florida, accredited by an agency recognized by the United States Department of Education and which has participated in common course numbering for at least 5 years. A second amendment would have required that in addition to the criteria in the first amendment, the institution must be both located and chartered in Florida. A third amendment would have specified that students attending Jones College, Everglades College, Florida Metropolitan University, Webster College, and the University of Phoenix could participate in ABLE. Based on an assessment of these criteria, a survey questionnaire was mailed to 35 institutions.

Responses were received from 30 or approximately 85% of the institutions surveyed.

The questions on the survey focused on which, if any, of the participation criteria each institution identified itself as meeting, the number of students enrolled at each institution, and the degree programs offered at each institution. When necessary, clarifying follow-up questions were asked. For reference purposes, each college was asked to provide a copy of its catalog and the institution's website was visited.

Additionally, the Commission for Independent Education and the Bureau of Student Financial Assistance were asked to jointly evaluate the eligibility of each of the institutions based on the questions in the survey, using information the institutions routinely submitted to the Department of Education. Student enrollment data supplied to the Department was compared to data submitted in the survey response.

Reports from the Office of Program Policy Analysis and Government Accountability were reviewed. Of particular interest were recommendations relating to the determination of residency for tuition purposes.

Research to identify accrediting agencies approved by the United States Department of Education was undertaken in early July through the use of the Internet. Websites of such accrediting agencies were viewed and on-line data describing the criteria for accreditation was examined. Various articles and reports about the accreditation process and the value of accreditation were also examined.

In addition, contacts were made with national agencies and with agencies in other states to determine if Florida's tuition assistance program in support of students at private for-profit and nonprofit institutions was unique.

FINDINGS

Common sense would indicate that the greater the restrictions or conditions which must be met to participate in a program, the fewer participants will qualify. Conversely, the reduction or removal of such constraints will increase the number of participants. In the case of the ABLE Grant Program, the greater the number of participants, the higher the state's cost to fund the program.

Residency for Tuition Purposes: In report number 03-70, Justification Review of the Private Colleges and Universities Program, OPPAGA states:

Private institutions are not required to follow the same residency determination process as public institutions. As a result, private institutions do not collect adequate information to determine residency status, which creates the

potential for state financial aid to be awarded to non-resident students. We recommend that private colleges and universities be required to follow Rule 6C-7.005, Florida Administrative Code, when making residency decisions and that the clarifying options suggested by our public institution residency report be applied to private institutions.²

In general, private institutions do not have a differentiated tuition or fee structure based on the residency status of a student. Therefore, the institutions do not collect specific enough information to correctly classify students as Florida residents or non-residents for tuition purposes and therefore, may be unable to determine the exact number of students who would qualify for an ABLE Grant Award. The institutions indicate the primary source of current information is the student's residence address listed on the Free Application for Federal Student Aid (FAFSA) for those students who apply for financial aid.

Year One Institutions: Three institutions meet all of the current criteria to be eligible to enroll grant recipients in the first year the Legislature provides funding for the ABLE Grant program. These institutions are: Ai Miami International University of Art and Design, Keiser College and South University. Each of the institutions is: a for-profit college or university, chartered and located in Florida, offering the baccalaureate degree, accredited by the Southern Association of Colleges and Schools (SACS), not a state university or community college, and has a secular purpose. Of the three, only Keiser College presently participates in the statewide common course numbering system. All three institutions have students attending on a Bright Futures Scholarship.

The baccalaureate degrees offered by these three institutions include:

Bachelor of Fine Arts in: Computer Animation, Graphic Design, Film, Interior Design, Visual Effects & Motion Graphics, and Visual Arts (Painting).

Bachelor of Arts in Business Administration, Bachelor of Science in Management Information Systems (MIS), Nursing, Legal Studies, and Information Technology.

Keiser College began to offer a baccalaureate degree in the 2002-03 academic year. The majority of its students are enrolled in what have traditionally been terminal associate degrees at that institution. Unless a student declares an intent to pursue a baccalaureate degree or is enrolled as an upper division student, the institution did not identify the

student as being eligible to participate in the ABLE Program.

The three institutions estimate that 1,515 of their 4,600 full-time students are currently full-time baccalaureate degree seeking. Of that number, the institutions estimate that 329, or about one-fifth, are Florida residents. If those estimates are correct, for every \$1,000 in ABLE grant tuition assistance provided by the state, the total first year cost would be \$329,000.

If the ABLE law were amended to allow participation of for-profit institutions accredited by an agency recognized by the United States Department of Education, and who have participated in the common course numbering system for at least five years, these five additional institutions would be eligible: The Art Institute of Ft. Lauderdale, the nine campuses of Florida Metropolitan University, Schiller International University, the three campuses of Webster College, and the two campuses of International Academy of Design and Technology are accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). All five of the institutions are chartered and located in Florida and will have participated in the statewide common course numbering system for five years by the 2004-05 academic year. Schiller and International Design each have only 2 courses currently on the common course numbering system.

If the ABLE law were amended to allow participation of for-profit institutions accredited by one of the six college and university regional accrediting organizations recognized by the United States Department of Education, located in Florida and who have participated in the common course numbering system for at least five years, and if the requirement to be chartered in Florida was repealed, the University of Phoenix would be eligible. It is accredited by the North Central regional accrediting association which is one of the regional accrediting organizations listed in current statute as acceptable for nonprofit institutional accreditation. It is not chartered in Florida and has only been located in-state for seven years. Although the University of Phoenix will have been a participating institution in the statewide common course numbering system for five years by the start of the 2004-05 academic year, it currently has no courses registered in the system.

Florida Metropolitan, Schiller, Webster College and Phoenix currently have students attending on a Bright Futures Scholarship.

If amendments were adopted to allow participation by all six institutions, the number of eligible full-time, baccalaureate degree seeking students is estimated as follows: Art Institute of Ft. Lauderdale, 861 Florida residents; Florida Metropolitan University, 8,100 of which 4,500 would be Florida residents; Schiller International University, 94; Webster College, 574 Florida residents; International Academy of Design, 363 Florida residents; and the

² OPPAGA Executive Summary, "Justification Review of the Private Colleges and Universities Program," December 2003, Report No. 03-70, page 3.

University of Phoenix, 7,665, of which 4,965 would be Florida residents. If those estimates are correct and all six institutions became eligible for funding as first year institutions, 11,057 Florida residents would qualify. If the state provided \$1,000 in ABLE grant tuition assistance to every eligible student, the total additional first year cost would be \$11,057,000.

Second Year Institutions: Current statutory language states that in the second year that the Legislature provides funding for the ABLE Grant Program, a student who is registered at a nonprofit college or university that: is chartered out of the state, has been located in the state for 10 years or more, and is accredited by any one of four listed regional accrediting agencies; grants baccalaureate degrees; is not a state university or community college; and has a secular purpose, would be eligible to receive funding from the ABLE Grant Program. Two regional accrediting organizations for baccalaureate degree granting institutions, the Northwest Association of Schools, Colleges and Universities and the Western Association of Schools and Colleges, are not listed and including them in the statutory listing would not increase the number of eligible institutions at the current time. The reference to the New England Association of Schools and Colleges incorrectly names the organization.

Eight institutions appear to meet these criteria. The institutions are Carlos Albizu University, Columbia College, Johnson and Wales University, National Louis University, Northwood University, Union Institute and University, University of St. Francis, and Webster University.

Five of the eight institutions currently enroll students on a Bright Futures Scholarship. None of the institutions currently participate in common course numbering.

The baccalaureate degrees offered by these eight institutions include:

Bachelor of Arts in: Elementary Education, Business Administration, Criminal Justice Administration, History, Political Science, General Studies, Psychology, Applied Behavioral Sciences, Health Care, Human Resource Management, and Management.

Bachelor of Science in: Psychology, Business Administration, Computer Information Systems, Food Service Management, Hospitality Management, Hotel Management, Marketing, Culinary Arts, Accounting, Management, Sports/Entertainment/Event Management, Health Care Leadership, Public Administration, Sociology/Social Work, Counseling, Nursing, and Health Arts.

Estimates are that the eight institutions have about 4,700 full-time baccalaureate degree seeking students. Of that number, with six of the eight institutions responding, the institutions estimate that about 1,650 students, or about one-third, are Florida residents. If those estimates are correct,

then for every \$1,000 in ABLE grant tuition assistance provided by the state to eligible students, the total initial year cost would be \$1,650,000 (i.e., the second year that the ABLE Grant Program itself is funded).

There are three additional institutions that meet some of the requirements to participate in the ABLE Grant Program. These institutions are: City College with three locations in Florida; Everglades College; and Jones College. Jones College and City College are accredited by ACICS. Everglades is accredited by the Accrediting Commission of Career Schools and Colleges of Technology (ACCSC).

Each of the three institutions is not-for-profit, chartered and located in Florida, secular, and has been in operation for more than 10 years. Each participates in the common course numbering system and each currently enrolls students on Bright Futures Scholarships.

Degrees awarded by the institutions include the Bachelor of Science in: Business Administration, Information Technology, Applied Management, Alternative Medicine, Professional Aviation, Aviation Management, Allied Health, Computer Accounting, Computer Information Systems, Legal Assisting, and Interdisciplinary Studies.

The number of full-time, baccalaureate degree seeking students in these institutions is estimated as follows: Jones College, 318 with approximately 250 Florida residents; City College, 505 students with 221 Florida residents; and Everglades College, 268 with 202 Florida residents. If those estimates are correct and an amendment were adopted to allow all three institutions to become eligible for funding as second year institutions, 673 Florida residents would qualify. For every \$1,000 in ABLE grant tuition assistance provided to eligible students by the state, the total initial year cost would be \$673,000 (i.e., the second year that the ABLE Grant Program itself is funded).

Troy State University: Troy State presents a unique mix of qualifications to participate in Florida's tuition assistance programs. Troy State receives no Florida tax revenue to support its educational offering, is required to be licensed by the Commission for Independent Education and operates like a private institution. Troy State is accredited by SACS, is chartered out of the state; has been in the state for more than 10 years, is secular and not-for-profit which are the primary qualifications for participation in the ABLE Program. Troy State has only been a participating member of the common course numbering system for two years, but has no courses in the system. Tuition at Troy State is reported as \$125/semester hour. This compares to the \$58.45/credit hour rate for the Florida State University System for the 2003-2004 fiscal year.

Except for being treated as a Florida public institution, Troy State meets all of the requirements for a nonprofit institution to participate in the ABLE Grant Program in the second year of funding.

The Florida Statutes identify Public Postsecondary Educational Institutions as “state-supported postsecondary educational institutions that are authorized and established by law,” referring to the Florida Constitution and Statutes. In its home state of Alabama, Troy State is a public state university. In Florida, it is neither a public community college nor a public state university.

Troy State offers baccalaureate degrees in Applied Science in Resources Management, Accounting, Computer Science, Criminal Justice, Management, Political Science, and Social Science.

Troy State reports it has 1,785 full time students of which 1,337 are reported as Florida residents. If those estimates are correct and the institution became eligible for funding, 1,337 Florida residents would qualify. For every \$1,000 in ABLE grant tuition assistance provided to eligible students by the state, the total initial year cost would be \$1,337,000 (i.e., the second year that the ABLE Grant Program itself is funded).

Accountability: The Legislature is actively endeavoring to require accountability in the expenditure of public funds. At the public school level, this effort has included private educational agencies which receive state funds or who enroll students receiving state funds. There is no reason to believe that the students attending institutions participating in the financial assistance, FRAG and ABLE Grant Programs might not be expected to meet certain accountability criteria. These criteria will probably be outcome based.

Student Data: In trying to determine the number of eligible students at the various institutions who might participate in the ABLE Grant Program, and thereby better identify the program cost, it was found that student enrollment data submitted to the Department of Education for other reports and purposes did not match the numbers reported by the institutions in response to the Senate Education Committee Interim Project Survey. In general, the number of students reported on the survey was lower than numbers reported on other forms. One possible reason is that full-time students in an associate degree program may be viewed by the reporting institution as not enrolled in a baccalaureate degree program. If the institution does not offer a baccalaureate degree into which the students could transfer, then indeed those students may not be eligible to participate in ABLE at that institution. Other institutional reports may include students enrolled in degrees at the masters and doctorate level.

Because data is not currently reported at an appropriate level of detail, in the future certain new data and data reports will be required to insure that the state is paying for eligible students and that eligible students are able to participate. The Department of Education will need to determine how such data on student eligibility and institutional qualifications will be collected.

Data details about the fiscal impact of the ABLE Grant Program will need to be addressed for the program’s Legislative Budget Request to be based on up-to-date data. Currently, estimates of the number of FRAG Program participants are developed through the education estimating conference. Similar data for the ABLE Grant Program is not currently included within the scope of the conference.

In summary, the state has identified a variety of acceptable criteria private institutions might be required to meet in order to participate in state financial aid and tuition assistance programs. Individual programs have a different mix of such acceptable criteria and the selected combination acts to limit or broaden the number of participants. The criteria utilized include: 1) accreditation by a United States Department of Education recognized accrediting organization, with the most common being regional accrediting organizations, usually SACS, 2) be either a for-profit or nonprofit organization, 3) be chartered either in-state or out-of-state, 4) be located in Florida, 5) be licensed to offer certain degrees through the Commission for Independent Education, 6) be in business in Florida for some period of time including 3, 5 or 10 years depending on the program, 7) demonstrate the institution’s financial soundness, 8) have a secular purpose, and 9) not be a state university or state community college.

RECOMMENDATIONS

Tuition assistance programs are designed to accomplish certain state goals: increase access to specific high demand baccalaureate degree programs, increase access to degree programs in general, provide a more skilled workforce, maximize the use of state funds for education, and encourage development of a public-private partnership to better meet the demands of the populace. In order to effectuate these goals more economically and efficiently, the following improvements to the current system are suggested for consideration.

GENERAL RECOMMENDATION:

Resident Status: To ensure state funds are supporting Florida residents and not students who have come to Florida for educational purposes, statutory language should be clarified for both public and private educational institutions to require the use of Rule 6C-7.005, Florida Administrative Code, when making residency decisions for undergraduate student fee rate, and for undergraduate financial assistance and tuition assistance programs. These changes should include clarifying that undergraduate students do not routinely qualify to become Florida residents for tuition purposes

by living in the state for one year while attending school.

TUITION ASSISTANCE PROGRAMS RECOMMENDATION:

Transfer of Credit: Institutions participating in both the FRAG and ABLE Grant Programs should either be active participants in the Florida common course numbering system or be party to an articulation agreement that guarantees the acceptance of college credit earned at participating institutions.

ACCESS TO BETTER LEARNING AND EDUCATION GRANT PROGRAM RECOMMENDATIONS:

Accreditation Status: Currently, only institutions accredited by four regional accrediting organizations may participate in the ABLE Grant Program. Participation should be expanded to include all six regional organizations which have been recognized by the United States Department of Education to accredit baccalaureate degree granting institutions. The controlling condition should be that the institution is licensed by the State of Florida to award the baccalaureate degree. The correct name of the New England Association of Schools and Colleges should replace existing language.

Optional Eligibility Criteria: In addition to the current statutory criteria to participate in the ABLE Grant Program, new language should be included to allow students enrolled at any non-public institution participating in the Florida common course numbering system to be eligible to receive funding from the ABLE Grant Program. Participation should be defined to mean that all of the institution's courses related to each secular baccalaureate degree, including the general education component and electives, have been properly evaluated, approved and are currently listed in the statewide common course numbering system. The Department of Education should develop procedures and audit student participation to ensure enrollment is in a secular degree program.

Exclusive Funding: Language should be inserted in the ABLE Grant Program to clarify that an institution may not participate in both the FRAG and ABLE Programs.

Estimating Conference: The ABLE Grant Program should be included in the consensus education estimating conferences (s. 216.136 (4) (a), F.S.) in order to base any legislative budget request on as accurate information as is available.

Outcome Accountability: At a minimum, each institution participating in the ABLE Grant Program should report the institution's graduation rate to the Department using the Integrated Postsecondary Education Data System (IPEDS) methodology and procedures. Provisions should be included that other appropriate outcome measures may be required by the Legislature through proviso language in the General Appropriations Act or in implementing legislation.

Troy State University: Troy State University is not a Florida public institution. It should be treated as a private out-of-state non-profit institution in determining student eligibility to participate in the ABLE Grant Program. Language should be amended in the FRAG and ABLE Programs to clarify the prohibition against participation refers to a Florida state university or Florida state community college.