



South Carolina
Higher Education
Tuition Grants Commission

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EARL L. MAYO, JR.
DIRECTOR

February 24, 2016

The Honorable Ted Mitchell, Under Secretary
United States Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Under Secretary Mitchell:

On behalf of over 13,000 undergraduate students from the State of South Carolina who are eligible recipients of the South Carolina Tuition Grant for the current academic year, we are writing in support of the February 12, 2016 letter written by the National Association of State Student Grant and Aid Programs (NASSGAP) requesting that the Department reconsider its proposed policy change concerning the randomization of students' Free Application for Federal Student Aid (FAFSA) school list order, which we agree will result in the unintended consequences of increased confusion and burden to students and families, as well as an administrative and financial burden on state grant agencies.

The South Carolina Tuition Grants Program was established in 1970 with the passage of Act 1191 by the SC General Assembly. The act became law on May 1, 1970, and is governed by provisions contained in Section 59, Chapter 113 of the South Carolina Code of Laws.

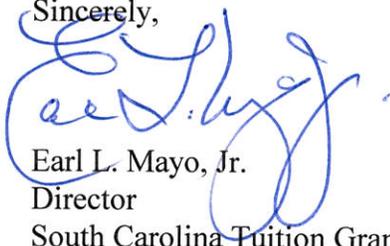
Since the 1994-1995 academic year, the South Carolina Tuition Grants Commission has, in partnership with the Department, successfully utilized the FAFSA as the electronic application for the Tuition Grant. Allowing students to apply for the state grant program automatically by completing the FAFSA has resulted in a simplified, streamlined process for our state's residents who are eligible for the Tuition Grant based on demonstrated financial need and who enroll in an eligible participating institution. Many of these applicants are first-generation college students; therefore, we believe simplicity and clarity are key factors in assuring access to educational opportunities, as well as promoting success and persistence as our program's grant recipients progress toward graduation.

Because of the centralized nature of the Tuition Grants Program and the need for the Commission to accurately predict annual funding allocations and State budget requests, the Tuition Grants Commission tentatively awards the Tuition Grant for the student's attendance at the first eligible college listed on the student's FAFSA, based on the order in which the colleges were listed by the student. Should the student choose to transfer to another participating institution, the Commission allows, and has always allowed, the student to do so in writing. After a thorough analysis of our Fall 2015 grant recipients, the Commission determined that **less than 4% of all Tuition Grant recipients were required to transfer their grant award from one institution to another**. While neither South Carolina, nor any other state, has ever asked students to rank order their schools on the FAFSA, our analysis shows that over 96% of students receiving the grant accurately listed the institution where they ultimately enrolled ahead of other institutions during the completion of the FAFSA.

The Tuition Grants Commission believes that receiving the school list in a randomized order would unequivocally hamper our efforts to provide timely and accurate award notifications to eligible students. The best case scenario is an increased burden on our limited resources as Commission staff members field an unknown increase in inquiries from students and parents who are confused by being initially awarded the grant for attendance at a college where they do not plan to enroll. The worst case scenario involves the development of a completely new awarding system that would integrate a secondary, stand-alone confirmation process in addition to the FAFSA, creating an additional and, until now, unnecessary step for students. The development of such a system would require a substantial amount of funds, which are currently unbudgeted and unavailable to the Commission; in fact, the cost of such an endeavor would likely reduce the currently allocated resources available for grants. In other words, we could very well be put into a position of having to reduce grant amounts to over 13,000 students annually in order to pay for the development of a new system, which will ultimately cause an additional step in the application process and potentially delay awards being sent on behalf of those students.

Thank you for this opportunity to express our concerns and to explain the importance of the school list order to the administration of the South Carolina Tuition Grants Program. We look forward to continuing our partnership with the Department so that we can continue to serve the needs of college students in South Carolina. If you need any additional information, please feel free to contact Earl Mayo at (803) 896-1122 or earl@sctuitiongrants.org.

Sincerely,



Earl L. Mayo, Jr.
Director
South Carolina Tuition Grants Commission



Elizabeth A. Dinndorf
President, Columbia College
Chair, South Carolina Tuition Grants Commission

cc: The Honorable Nikki Haley, Governor, State of South Carolina
The Honorable Lindsey Graham, United States Senator
The Honorable Tim Scott, United States Senator
The Honorable Mark Sanford, United States Congressman, SC District 1
The Honorable Joe Wilson, United States Congressman, SC District 2
The Honorable Jeff Duncan, United States Congressman, SC District 3
The Honorable Trey Gowdy, United States Congressman, SC District 4
The Honorable Mick Mulvaney, United States Congressman, SC District 5
The Honorable James Clyburn, United States Congressman, SC District 6
The Honorable Tom Rice, United States Congressman, SC District 7
Roberto Rodriguez, Deputy Assistant Secretary to the President, The White House
James Kvaal, Deputy Director, Domestic Policy Council, The White House
Ajita T. Menon, Senior Policy Advisor for Education, Domestic Policy Council,
The White House
Spiros Protopsaltis, Deputy Assistant Secretary, United States Department of Education
Jeff Appel, Deputy Under Secretary of Education, United States Department of Education
Jeff Baker, Director, Policy Liaison and Implementation, United States Department of
Education
Kathleen Smith, Education Policy Advisor, HELP Committee, Office of Senator Lamar
Alexander
Katie Harrison, Deputy Director, South Carolina Tuition Grants Commission