



Tab 1

A+ Dual Credit/Dual Enrollment Administrative Rule

Coordinating Board for Higher Education
July 20, 2021

BACKGROUND

During the 2019 session, the General Assembly passed and Governor Parson signed legislation establishing a dual credit/dual enrollment scholarship program linked to the existing A+ program. The related statutory excerpts are included as Attachment A. Although the program was enacted in 2019, the program was not funded until FY 2022.

The statute requires the department to establish a procedure for the reimbursement of the cost of tuition and fees for any dual credit or dual enrollment course offered to a student in high school who meets the requirements for A+ eligibility immediately before taking the course. The dual credit coursework must be offered by an institution of higher education or vocational or technical school. Private vocational or technical schools must meet certain criteria in order to be eligible. Reimbursements for dual credit or dual enrollment coursework must be made on the basis of financial need.

By department policy established previously, dual credit coursework is a college level course taught by a high school instructor to high school students who are simultaneously earning both high school and college credit for the course. Dual enrollment coursework is a college level course taught by postsecondary faculty to high school students who are earning college credit, and may be earning high school credit, for the course.

CURRENT STATUS

Although the statute was drafted with the intent of using excess A+ money to fund the dual credit/dual enrollment scholarship, that approach is considered problematic as the availability of such funds would not be known until payments to all postsecondary A+ students were completed. Under this approach, the dual credit/dual enrollment payment in many instances would not occur until nearly nine months after the cost was incurred. This approach is inconsistent with the stated intent of the legislation which is to incentivize students to take dual credit or dual enrollment courses who would otherwise be unable to afford to do so. In recognition of that issue, the legislature appropriated \$5 million during the 2021 legislative session using a separate appropriation line dedicated to the dual credit/dual enrollment program.

Given the difference between the \$5 million appropriated and the projected cost of the program at the time of its passage (\$9.9 million) and the short time frame for program implementation, the decision was made to delay the program start until the spring 2022 semester. In order to have an administrative rule in place in time for that implementation, staff is seeking Coordinating Board approval now.

The draft administrative rule is included as Attachment B. Because the intent is for this program to closely mirror the existing postsecondary A+ program, the rule retains as much of the existing program's requirements as feasible. Consequently, the attached draft retains requirements relating to U.S. citizenship, attendance, A+ high school enrollment, grade point average, and the end-of-course mathematics exam requirement. Some of these provisions required modification based on the fact that the recipients for this program will not have graduated from high school.

To help understand the implementation of the proposed program, the following outlines the process DHEWD has proposed for application through payment.

1. The student will complete an application, which will be available on DHEWD's website, and will submit it to DHEWD for review by the established deadline. The application will collect the family's Adjusted Gross Income information to help DHEWD rank the students by financial need, in accordance with the statutory requirements.

2. The high school will provide DHEWD a list of dual credit/dual enrollment students who have met the scholarship's A+ related eligibility criteria (GPA, attendance, good citizenship, End-of-course Exam).
3. DHEWD will match the applications received with the high school's list of dual credit/dual enrollment students. Students who have both applied and appear on their high school's verification list will be processed.
4. DHEWD will rank the matched students first by Adjusted Gross Income and then by earliest application received date. Students will be awarded in rank order starting with the lowest income until all available funds are expended or all eligible students are accounted for, whichever comes first. Students who cannot be funded initially will be considered if funding remains after the dual credit/dual enrollment providers have completed the final eligibility verification and disbursements have been made to all eligible students.
5. DHEWD will provide a certification roster of the potentially eligible students to the dual credit/dual enrollment providers for verification of eligibility and certification of the reimbursement amount.
6. In preparing the attached draft, DHEWD staff solicited comments from several constituent groups. The department received comments from nine individuals, three from the advisory group, five from the Student Financial Aid Committee, and one from department staff. The comments are summarized below in three categories: Concerns, Recommendations, and Questions.

Concerns

Rule Reference	Comment	Department Response
General Concern	The process outlined will create an administrative burden for high school and DHEWD staff.	No changes made. New programs cannot be implemented without additional administrative burden.
(3)(A)3	Institutions rely on the FAFSA to verify citizenship, which is not available for this population of students. Requiring postsecondary institutions to verify this eligibility criterion will create reimbursement delays and will require institutions to notify students of their ineligibility if they do not meet this criterion.	No changes made. It is DHEWD's understanding that high schools cannot ask for students' citizenship status and DHEWD verification of this criterion would delay reimbursement further as we would have to verify this for a much larger pool of students. In addition, this process for treating students who aren't certified is consistent with the other state aid programs.
(4)(A)5	The 95% attendance threshold is too high and will create a barrier for the target population. In addition, it will increase the number of appeals for high schools to process.	No changes made. This requirement is consistent with the legislative intent that students be on track for receiving the A+ Scholarship.
(5)(B)	Not accepting late applications will close the door on potentially eligible students and will limit the department's flexibility in spending any remaining funds after all on-time applicants have been paid.	Revision made to remove the provision that late applications will not be accepted.
(6)(I)	Delivering reimbursement to students at the end of the semester will be difficult if the student is no longer enrolled. It will also create a barrier for the target population.	No changes made. Given the purpose of the program and the target population, the intent is for reimbursement to occur as early in the semester as possible. Also, DHEWD reimbursement would create an additional barrier as students would be required to complete a vendor application to receive funds directly from the state.

Recommendations

Rule Reference	Comment	Department Response
General Recommendation	The scholarship should be awarded after high school graduation to ensure recipients are fully A+ eligible and to allow sophomores enrolled in dual credit/dual enrollment coursework to benefit from the scholarship.	No changes made. Reimbursement after graduation would undermine the purpose of the program and create a barrier for the target population.
General Recommendation	Ensure students and families understand the timing of the reimbursement and any up-front payment expectations. Since the scholarship is a reimbursement and will not cover upfront costs, institutions will have to individually decide whether to “float” the students’ payments.	No changes made. DHEWD will consider this when promoting the program.
General Recommendation	Clarify the statutory payment priority in the rule.	No changes made. The funding structure in place, with separate line items for the A+ Scholarship and Dual Credit/Dual Enrollment Scholarship, makes such a change unnecessary.
(4)(A)3	Clarify whether the agreement in this paragraph refers to the regular A+ agreement or a new agreement specific to the Dual Credit/Dual Enrollment Scholarship.	Revision made. The agreement refers to the regular A+ agreement so a reference to the A+ Scholarship administrative rule was added for clarity.
(6)(B) 2-3	Dropped or withdrawn coursework should not be eligible for reimbursement since they are not eligible for regular A+ reimbursement. Also, incomplete and withdrawn coursework could be reimbursed twice, once when the course is initially taken and again if it is repeated.	No changes made. Allowing for reimbursement of dropped and withdrawn coursework reduces the risk of out-of-pocket expenses for the target population and allows for earlier reimbursement. This offsets the risk of double payment.
(6)(E)	AGI is not the best indicator of need and self-reported information will be inaccurate. The FAFSA 4Caster is recommended as an alternative.	No changes made. The FAFSA 4Caster is no longer available. DHEWD explored a similar tool offered by the College Board but it could easily be falsified; income verification would still be required.
(6)(G)	Allow retroactive fall 2021 payments if funding remains at the end of the fiscal year.	No changes made. DHEWD will consider this approach based on the circumstances at the end of the fiscal year.

Questions

The questions received primarily concerned the high school student eligibility criteria, the need determination, and the process. None of the questions resulted in changes to the rule. Key questions and the department's responses included:

- Is the Algebra I EOC required even if the dual credit/dual enrollment coursework in which the student is enrolled is not math related? Yes. This requirement is included because it is consistent with the legislative intent that students be on track for receiving the A+ Scholarship.
- Is there a maximum number of classes at each institution that will be reimbursed? It is DHEWD's intention that the AGI/application date cutoff will be established at a point that will allow for all of a student's dual credit/dual enrollment coursework to be reimbursed. A student will not receive partial reimbursement. Therefore, there is no limit to the number of classes that will be reimbursed.
- Will the need determination be based on a family's most recent tax information or the prior-prior year information? DHEWD is still considering the answer to this question.
- Will the application be available through the Student Portal? The application will be available only on the website until resources allow for automation of this program. Incorporation of the application into the Student Portal will be a future enhancement.
- What is the timeline for DHEWD's review process? DHEWD is still refining the process and will provide a more detailed timeline as soon as possible.

NEXT STEPS

If approved, the department will begin the rule promulgation process by filing the proposed rule with the Secretary of State. The proposed rule will then be published in the Missouri Register and a 30 day public comment period will commence. Once the comment period has closed, the department will file an order of rulemaking, which will include information about comments received and any resulting revisions to the original proposed rule. The rule becomes effective 30 days after it is published in the Code of State Regulations.

RECOMMENDATION

Staff recommend that the Coordinating Board direct the Commissioner of Higher Education to take all actions necessary to ensure the attached proposed administrative rule becomes effective as soon as possible.

ATTACHMENTS

- A. A+ Dual Credit/Dual Enrollment Scholarship Statutory Provisions
- B. A+ Dual Credit/Dual Enrollment Scholarship Proposed Administrative Rule

Tab 1 Attachment A
A+ Dual Credit/Dual Enrollment Scholarship Statutory Provisions

Excerpts from Section 160.545, RSMo

8. The department of higher education and workforce development shall, by rule, establish a procedure for the reimbursement of the cost of tuition, books and fees to any public community college or vocational or technical school or within the limits established in subsection 11 of this section for any two-year private vocational or technical school for any student:

(1) Who has attended a high school in the state for at least two years that meets the requirements of subsection 2 of this section and who has graduated from such a school; except that, students who are active duty military dependents, and students who are dependents of retired military who relocate to Missouri within one year of the date of the parent's retirement from active duty who meet all other requirements of this subsection and are attending a school that meets the requirements of subsection 2 of this section shall be exempt from the two-year attendance requirement of this subdivision; and

(2) Who has made a good faith effort to first secure all available federal sources of funding that could be applied to the reimbursement described in this subsection; and

(3) Who has earned a minimal grade average while in high school or through the semester immediately before taking the course for which reimbursement is sought as determined by rule of the department of higher education and workforce development, and other requirements for the reimbursement authorized by this subsection as determined by rule and regulation of the department; and

(4) Who is a citizen or permanent resident of the United States.

9. The department of higher education and workforce development shall, by rule, establish a procedure for the reimbursement of the cost of tuition, and fees for any dual-credit or dual-enrollment course offered to a student in high school in association with an institution of higher education or vocational or technical school, subject to the requirements of subsection 11 of this section, for any student who meets the requirements established in subsection 8 of this section immediately before taking the course for which reimbursement is sought.

11. For a two-year private vocational or technical school to obtain reimbursements under subsection 8 or 9 of this section, the following requirements shall be satisfied:

(1) Such two-year private vocational or technical school shall be a member of the North Central Association and be accredited by the Higher Learning Commission as of July 1, 2008, and maintain such accreditation;

(2) Such two-year private vocational or technical school shall be designated as a 501(c)(3) nonprofit organization under the Internal Revenue Code of 1986, as amended;

(3) No two-year private vocational or technical school shall receive tuition reimbursements in excess of the tuition rate charged by a public community college for course work offered by the private vocational or technical school within the service area of such college; and

(4) The reimbursements provided to any two-year private vocational or technical school shall not violate the provisions of [Article IX, Section 8](#), or [Article I, Section 7](#), of the Missouri Constitution or the first amendment of the United States Constitution.

12. The department of higher education and workforce development shall distribute reimbursements in the following manner:

(1) To community college or vocational or technical school students;

(2) After all students from subdivision (1) of this subsection have been reimbursed, to any dual-credit or dual-enrollment student on the basis of financial need.

Tab 1 Attachment B
A+ Dual Credit/Dual Enrollment Scholarship Proposed Administrative Rule

6 CSR 10-2.195 A+ Dual Credit/Dual Enrollment Scholarship Program

PURPOSE: This rule sets forth the policies of the Coordinating Board for Higher Education regarding institutional and student eligibility for student financial assistance under the A+ Dual Credit/Dual Enrollment Scholarship program.

(1) Definitions.

(A) A+ designated high school shall mean a high school that the Department of Elementary and Secondary Education has determined meets the requirements established in section 160.545, RSMo, and has been approved by the Board of Education for participation in the A+ Program.

(B) A+ Dual Credit/Dual Enrollment Scholarship shall mean the tuition reimbursement program set forth in subsection 9. of section 160.545, RSMo.

(C) Approved institution shall mean any institution located in the state of Missouri that meets the requirements set forth in subdivisions 173.1102.1(2), (3), or (4), RSMo, that has been approved under 6 CSR 10-2.140, and that has been approved to participate in the federal student financial assistance programs created in Title IV of the Higher Education Act of 1965, as amended.

(D) Award year shall be from July 1 of any year through June 30 of the following year.

(E) CBHE shall mean the Coordinating Board for Higher Education created by section 173.005.2, RSMo.

(F) Department shall mean the Department of Higher Education and Workforce Development created by section 173.005.1, RSMo.

(G) Dual Credit coursework shall mean college level courses taught by high school instructors to high school students who are simultaneously earning both high school and college credit for these courses.

(H) Dual Enrollment coursework shall mean college level courses taught by postsecondary faculty to high school students who are earning college credit, and may be earning high school credit, for these courses.

(I) Eligible coursework shall mean dual credit or dual enrollment coursework provided by an approved institution.

(J) Eligible student shall mean a student at an A+ designated high school who has applied for the Dual Credit/Dual Enrollment Scholarship program and who has been verified by the A+ designated high school in accordance with subsection (2)(A) of this rule.

(K) Recipient shall mean an eligible student who has been verified by an approved institution in accordance with subsection (3)(A) of this rule and has been paid an award.

(L) Repeat coursework shall be any coursework for which the recipient has been assigned a grade under the institution's standard grading policy, excluding coursework for which the recipient was placed in an incomplete or withdrawn status, in a previous term.

(M) Student shall mean a student attending an A+ designated high school who is applying for, or has applied for, a Dual Credit/Dual Enrollment Scholarship award.

(N) Tuition and fees shall mean any charges to eligible students classified as tuition and any institutional fees charged to all dual credit or dual enrollment students, excluding course-specific fees.

(O) Tuition reimbursement shall mean an amount of money paid by the state of Missouri to an eligible student enrolled in dual credit or dual enrollment coursework under the A+ Dual Credit/Dual Enrollment Scholarship program for costs related to tuition and general fees, subject to state appropriations, after all other sources of non-loan funding have been applied.

(2) Responsibilities of A+ Designated High Schools.

(A) Verify which students enrolled in dual credit or dual enrollment coursework have met the eligibility requirements listed in section (4) of this rule except for subsection 2 of that section.

(B) Submit the information required to verify student eligibility to the department by the deadline established for each semester.

(3) Responsibilities of Approved Institutions.

(A) Before requesting reimbursement for an eligible student, verify the following:

1. The eligible student is enrolled in eligible coursework;
2. The amount of the reimbursement request, including the number of hours in which the eligible student is enrolled and the credit hour rate for those hours; and
3. The eligible student is a U.S. citizen or permanent resident.

(B) Comply with the institutional responsibilities required in section 6 CSR 10-2.140(5), with the exception of paragraph 6 CSR 10-2.140(5)(A)5.

(C) Verify all other sources of non-loan funding are applied correctly to tuition and general fees, as specified in subsection (6)(C) of this rule.

(4) Eligibility Policy.

(A) To qualify for tuition reimbursement, a student must meet the following criteria:

1. Attend an A+ designated high school or high schools for at least two (2) years prior to the semester in which tuition reimbursement is being sought. Enrollment during the two (2) years in which the student was in attendance at one (1) or more A+ designated high schools must total a minimum of seventy-five percent (75%) of the instructional days required by the high school at which the student is enrolled while taking the dual credit or dual enrollment coursework. Interruptions in enrollment cumulatively totaling no more than twenty-five percent (25%) of instructional days in the two (2) years in which the student was in attendance at one (1) or more A+ designated high schools may occur consecutively or intermittently;
2. Be a U.S. citizen or permanent resident;

3. Enter into a written agreement as required by paragraph 6 CSR 10-190(3)(A)4 with the A+ designated high school prior to the semester in which tuition reimbursement is being sought;
4. Meet the high school's requirements for taking dual credit or dual enrollment coursework, except that students must have a minimum overall unweighted high school grade point average of at least two and one-half (2.5) on a four-point (4.0) scale, or the equivalent on another scale, through the semester immediately preceding the semester in which tuition reimbursement is being sought;
5. Have at least a ninety-five percent (95%) attendance record overall through the semester immediately preceding the semester in which tuition reimbursement is being sought;
6. Meet one (1) of the following indicators of college preparedness prior to the semester in which tuition reimbursement is being sought, unless the A+ school district has met all of the Department of Elementary and Secondary Education's (DESE) requirements for waiver of the Algebra I end-of-course exam for the student:
 - A. Have achieved a score of proficient or advanced on the official Algebra I end-of-course exam, or a higher level DESE approved end-of-course exam in the field of mathematics; or
 - B. Meet other criteria established by the CBHE. The CBHE will develop these criteria in consultation with approved institutions and A+ designated high schools and may revise these criteria annually;
7. Have maintained a record of good citizenship and avoidance of the unlawful use of drugs and/or alcohol through the semester immediately preceding the semester in which reimbursement is being sought. Student participation in the Constitution Project of Missouri may be included in a student's record of good citizenship in accordance with the A+ designated high school's policy; and
8. Be enrolled in eligible coursework.

(5) Application and Evaluation.

- (A) The department shall prescribe the time and method for filing applications for tuition reimbursement under the A+ Dual Credit/Dual Enrollment Scholarship program. It shall make announcement of its action in these respects.
- (B) Students must submit a completed application by any established deadlines to be considered for tuition reimbursement.
- (C) The department will evaluate each application and assign the eligible student's payment rank in accordance with subsection (6)(E) of this rule.

(6) Award Policy.

- (A) Tuition reimbursement shall occur each semester within one (1) award year.
- (B) Tuition reimbursement will be as specified for the following categories of eligible coursework:
 1. Completed coursework for which a grade is assigned under the institution's standard grading policy, including coursework assigned a grade of Incomplete, will be reimbursed.

2. Dropped or withdrawn coursework will be reimbursed, based on the approved institution's tuition refund policy
3. Repeat high school dual credit or dual enrollment coursework will not be reimbursed;

(C) The amount of the tuition reimbursement must be calculated based on the remaining costs of actual tuition and fees after all other non-loan aid has been applied.

(D) Tuition reimbursement is subject to legislative appropriation.

(E) If insufficient funds are available to pay all eligible students, the department will rank eligible students first from lowest to highest Adjusted Gross Income as provided in the eligible student's application and then from earliest application received date, and will make reimbursement according to rank order until all available funds for the semester are expended:

(F) Tuition reimbursement will be made for dual credit or dual enrollment coursework taken in the fall and spring semesters, but no tuition reimbursement will be made for such coursework taken in summer school.

(G) No tuition reimbursement will be made retroactive to a previous award year. Tuition reimbursement will be made retroactive to a previous semester only upon the sole discretion of the department.

(H) Tuition reimbursement will be made only after institutional certification of the eligible student's eligibility and the amount of the tuition reimbursement.

(I) The recipient's award will be sent to the approved institution to be delivered to the student's account.

(J) An eligible student's failure to provide required information by the established deadlines may result in loss of the A+ Dual Credit/Dual Enrollment Scholarship for the period covered by the deadline.

(K) The CBHE has the discretion to withhold payments of any tuition reimbursements after initiating an inquiry into the eligibility or continued eligibility of an eligible student or recipient.

(L) A recipient may receive tuition reimbursement from more than one approved institution in a semester or award year.

(7) Information Sharing Policy. All information on an individual's A+ Dual Credit/Dual Enrollment Scholarship application may be shared with the financial aid office of the approved institution providing the individual's dual credit or dual enrollment coursework, or the A+ designated high school the student is attending, to permit verification of data submitted. Information may be shared with federal financial aid offices, if necessary, to verify data furnished by state or federal governments as provided for in the Privacy Act of 1974, 5 U.S.C. sections 552, 552a.

Authority: section 160.545, RSMo Supp. 2019* and Executive Order 10-16, dated January 29, 2010.

*Original authority: 160.545, RSMo 1993, amended 2002, 2008, 2009, 2010, 2014, 2015, 2016, 2018.