

**EDUCATIONAL OPPORTUNITY GRANT PROGRAM EVALUATION
Report and Recommendations**

December 2000

EXECUTIVE SUMMARY

The Higher Education Coordinating Board (HECB) has conducted a review over the past several months of the Educational Opportunity Grant (EOG) program. The study has evaluated the program's effectiveness in achieving the goals of the enabling legislation. It also has considered whether statutory or regulatory modifications should be proposed, given the 2000 Master Plan for Higher Education's emphasis on placing the learner at the center of higher education decision-making.

The Board discussed study design and preliminary findings at its meetings in May and July 2000, and reviewed a draft report and recommendations of the Board's planning and policy committee at its meeting on October 26, 2000. No additional comments regarding the report or its recommendations have been received since the October meeting.

The final report, which is attached, contains the following recommendations for modification, as discussed by the Board in October:

1. **County of Residence.** Eligibility should be expanded to residents of all counties.
2. **Branch Campuses.** Eligibility should be extended to students who wish to enroll at state-supported branch campuses, enabling recipients to select the program and eligible institution that best responds to their educational goals.
3. **Institutional Participation.** Institutional eligibility should be extended to branch campuses, extension sites, and educational facilities that operate within the state of Washington, that are affiliated with regionally accredited nonprofit institutions in another state, and meet the following criteria:
 - Have delivered on-site classroom instruction within the state of Washington for a minimum specified period of time;
 - Are fully certified and participate in federal student financial aid programs;
 - Are eligible for and participate in the Washington State Need Grant program; and,
 - Provide necessary assurances of administrative capability.
4. **Grant Amounts.** Grant amounts should be established by rule of the Board, rather than in statute, so that they may be periodically adjusted, as necessary, to reflect such factors as changes in the costs of attendance and the availability of other grant assistance.

5. **Period of Award.** Administrative procedures should be modified to permit grant periods to begin during any academic term upon the student's transfer to an eligible institution, with continuing eligibility contingent upon attainment of junior status by the end of the first term of award, with a maximum award period of eight quarters (or equivalent).
6. **Transfer Degrees.** The enabling legislation should be amended to include reference to the Associate of Science degree as an appropriate transfer degree for purposes of establishing eligibility for the EOG.
7. **"Unused Institutional Capacity."** The concept of "unused institutional capacity" is no longer relevant, and its reference should be eliminated.
8. **Program Status.** Reference to the EOG program as a demonstration project should be deleted, and the program should be continued as an on-going program which complements the state's other financial aid programs.

The Board will be asked to approve Resolution 00-55, adopting the final report and recommendations, on December 6, 2000.

EDUCATIONAL OPPORTUNITY GRANT PROGRAM EVALUATION Report and Recommendations

December 2000

BACKGROUND

The 1987 Master Plan adopted by the Higher Education Coordinating Board (HECB) cited inadequate access to baccalaureate education for the state's urban population as an urgent problem. At the recommendation of the HECB, the 1990 Legislature established the Educational Opportunity Grant (EOG) program¹ as one of three strategies designed to address the need for greater access to baccalaureate education. The other strategies included lifting enrollment lids at four-year public institutions, and creating branch campuses to serve upper-division and graduate students living in the state's urban areas.

The EOG program was created as a demonstration project to provide another educational option for "placebound"² residents of counties served by the branch campuses. It was based on an assumption that the size and, therefore, the construction and operating costs of the proposed branch campuses could be reduced if students could be encouraged, through the provision of a \$2,500 grant, to enroll in existing public or independent institutions with capacity.

The EOG program also was established to allay the concerns of independent colleges and universities that the new branch campuses would reduce their enrollments. Therefore, the enabling legislation specified that the EOG could not be used to attend a branch campus.

Since its inception in 1990, the Educational Opportunity Grant program has provided nearly \$12.5 million in financial aid to assist approximately 3,100 students in completing upper division studies.³ Most recipients have received the grant for two years.

Like other financial aid programs, the EOG program requires recipients to demonstrate financial need. The program is unique, however, in several ways. To receive an EOG a student must:

- Have received an associate of arts degree or its equivalent;
- Intend to complete a baccalaureate degree;
- Meet the statutory definition of "placebound;"
- Reside in one of 13 counties served by a branch campus;
- Attend a Washington public or private four-year college or university with the capacity to accommodate students within existing education programs and facilities; and
- Adhere to the EOG program's religious-program exclusion.⁴

¹ A copy of the statute establishing the EOG program is found in Appendix B.

² RCW 28B.101.020(1) defines placebound as, "unable to relocate to complete a college program because of family or employment commitments, health concerns, monetary inability, or other similar factors." Subpart (2) of the same section states, "...A placebound resident is one who may be influenced by the receipt of an enhanced student financial aid award to attend an institution that has existing unused capacity rather than attend a branch campus established pursuant to chapter 28B.45 RCW. An eligible placebound applicant is further defined as a person whose residence is located in an area served by a branch campus who, because of family or employment commitments, health concerns, monetary need, or other similar factors, would be unable to complete an upper-division course of study but for receipt of an educational opportunity grant."

³ Appendix C provides a report of awards and expenditures, by institution, by year.

Finally, because the program was established to encourage needy, placebound students to attend existing baccalaureate institutions, the enabling legislation also stipulates that recipients may not use the grant to attend a branch campus.⁵

The program serves a population that is unique from that of other aid programs. The typical recipient is older than other aided students, is most likely to be female, and is more likely to have children to support. With a family size of 2.4, and an income of approximately \$15,000, she is expected to contribute about \$1,500 toward her own college costs. She also is likely to receive a State Need Grant, together with other grants, and will borrow over \$5,500 per year to complete her baccalaureate education.

A supplement to other grant aid, the EOG reduces the amount of need-based loans the student would otherwise have to assume or helps cover documented need not met by other aid programs. Its purpose is to provide a financial incentive to enable placebound students who face barriers to continuing their education to enroll in a local college or university or to relocate to complete their baccalaureate degree.

While recipients may reside in any of 13 counties served by a branch campus, traditionally about three-fourths each year are from King, Pierce, Spokane, or Yakima counties.⁶

1994 PROGRAM EVALUATION

The EOG program last underwent comprehensive review in 1994.⁷ That study, conducted by William Chance (NORED), concluded that the program appeared to be meeting its intended purposes and goals. Specifically, it stated, “Grants in the amount of the EOG apparently can induce otherwise placebound students to attend institutions the cost of which otherwise might have been beyond their means. The effects are reflected in the enrollment patterns of EOG recipients, which have been predominantly in local institutions.”

The 1994 evaluation found that the EOG program had been less effective as an inducement for students to relocate (although some participants had done so), noting that the independent variable appeared to be the combination of circumstances affecting the potential mobility of the student. People with jobs, families, or other such responsibilities, were unlikely to relocate to complete their baccalaureate for grants in the amount of the EOG.

The report indicated that the EOG program was reaching its intended clientele and that EOG recipients were more likely to complete their baccalaureate degrees than other students. Students who received EOG awards during the program’s first two years and attended the three institutions with the largest number of recipients, had a baccalaureate degree completion rate of 85 percent – substantially greater than that of other students.

⁴ RCW 28B.101.040, “...The participant shall not be eligible for a grant if it will be used for any programs that include religious worship, exercise, or instruction or to pursue a degree in theology...”

⁵ RCW 28B.101.040, “...Grants shall not be used to attend any branch campus or educational program established under chapter 28B.45 RCW...”

⁶ Other eligible counties include Benton, Clark, Cowlitz, Franklin, Kitsap, Skamania, Snohomish, Thurston, and Walla Walla. See Appendix D.

⁷ Chance, William (May 1994), *Educational Opportunity Grant Program Evaluation for the Washington State Higher Education Coordinating Board*.

However, the study raised questions regarding the statutory provisions limiting eligibility to residents of counties served by branch campuses and restricting use of the EOG at the branch campuses. Following consideration and discussion of the 1994 evaluation, the Board chose to continue the program as currently enacted.

LEGISLATIVE INTEREST

In each of the last three years, legislation has been considered to modify various aspects of the EOG program. Bills introduced in 1997, and reconsidered in 1998, proposed to do one or more of the following: (1) extend eligibility to students from all counties; (2) permit use of the grant at branch campuses; (3) eliminate references to unused capacity; and (4) use grants to fill under-enrollments. Another bill, introduced in 1998, would have authorized the use of Educational Opportunity Grants at WSU's Vancouver branch campus and for Oregon border reciprocity. In 1999, some legislators expressed interest in expanding eligibility to students in all counties, but deferred action until the Board had had an opportunity to complete its review of the program and recommend any modifications.

2000 PROGRAM REVIEW

In conducting the current EOG program review, HECB staff evaluated the program's effectiveness in achieving the goals of the enabling legislation. The study also considered whether to propose statutory or regulatory modifications, given changes that have occurred in higher education delivery since 1990, when the program was established, particularly given the emphasis in the Board's 2000 Master Plan for Higher Education on placing the learner at the center of higher education decision making.

Part I: Evaluation of Program Effectiveness in Achieving Statutory Goals. Because of its size, the program cannot be viewed as having had a significant impact on the statewide baccalaureate degree completion rate. Therefore, program effectiveness has been evaluated from the perspective of the program's influence on the enrollment patterns of the urban, placebound students the program was designed to assist.

Two study questions were identified for analysis:

- **Question 1:** Does participation in the EOG program associate with increased persistence toward a baccalaureate degree? (Or, stated another way, how did the number of credits attempted and completed by EOG recipients compare to other aided, upper-division Washington students?); and
- **Question 2:** To what extent does participation in the EOG program associate with enrollment at a Washington four-year institution? (Or, to what extent does the EOG program influence urban, placebound students to pursue upper-division coursework?)

The 1994 evaluation utilized student surveys for its analysis of program performance. To complement that work, and to gain a different perspective, staff decided to employ statistical analysis in conducting the current review.

The study period commenced with the 1994-95 academic year. Data were collected from five sources:

- EOG recipient data file;
- EOG denied applicant data file;
- Student financial aid recipient (Unit Record Report) database;
- Student financial aid application (Free Application for Federal Student Aid) database; and
- Enrollment records provided by institutions, showing credits attempted and completed by students in the sample populations during a designated timeframe.

Question 1: How did the number of credits attempted and completed by EOG recipients compare to other aided, upper-division Washington students?

According to enabling legislation, it is the intent of the program to assist placebound students who have completed an associate of arts degree, or its equivalent, in an effort to increase their participation in, and completion of, upper division programs. To assess whether the EOG program is achieving this statutory goal, staff compared the total number of credits earned by EOG recipients over a two-year period to two comparison groups: (1) other upper-division financial aid recipients from the 13 counties designated as EOG-eligible; (2) and upper-division financial aid recipients from the 26 Washington counties not currently eligible to participate in the EOG program. Institutions provided term-by-term enrollment data for each of the students in the HECB's sample populations, for specified time periods.

Information provided by the institutions revealed that EOG recipients completed four credits more over a two-year period than other upper-division, aided students from EOG-eligible counties. This difference is not statistically significant, and does not seem noteworthy until further observation is made of the difference in the profiles of EOG recipients, compared to other aided, upper division students from the same counties. As shown in greater detail in Table 1, EOG recipients were:

- Older (29, compared to 26);
- Half as likely to be dependent on their parents for support (18 percent, compared to 38 percent);
- Much more likely to have children of their own (61 percent, compared to 35 percent); and
- Needier than students in their same-county comparison group (with a mean financial need of \$15,928, compared to \$11,913).

Considering the existence of multiple factors that presumably made their participation in higher education more difficult, the fact that these placebound students completed as many credits as other aided students from the same counties is a positive finding.

Surprisingly, the enrollment data revealed that EOG recipients earned 16 quarter credits *more*, over a two-year period than upper division financial aid recipients in the study group from counties not eligible for the EOG program. Further comparison of the profiles of these two populations indicates somewhat more similarity than was found between EOG recipients and other aided students from eligible counties.

Table 1
**Selected Variables of Sample Populations
 EOG Recipients Compared to Upper Division Aid Recipients
 From Eligible and Ineligible Counties
 1994-95 through 1997-98 Cohorts**

Means and Frequencies of Selected Variables by Group

Variable	EOG Participant N= 164	Other Upper Division Aid Recipients from Eligible Counties N= 162	Other Upper Division Aid Recipients from Ineligible Counties N= 162
Mean Age	29	26	28
Gender			
Female	74%	59%	62%
Male	26%	41%	38%
Family Status			
Dependent	18%	38%	29%
Ind., Single	16%	23%	23%
Ind., Single, Child	35%	20%	28%
Ind., Married	6%	4%	5%
Ind., Married, Child	26%	15%	15%
Race/Ethnicity			
White	70%	57%	77%
African American	4%	3%	1%
Native American	3%	3%	6%
Asian/Pacific Islander	9%	23%	5%
Latino/Hispanic	7%	7%	3%
Other/Unknown	7%	6%	9%
Mean Expected Family Contribution	\$ 1,482	\$ 1,338	\$ 1,319
Mean Financial Need	\$15,928	\$11,913	\$10,797

Conclusion

In summary, the “boost” provided by the EOG has enabled recipients to participate in upper division studies at the same rate as other students with fewer barriers. Furthermore, the data suggests that the EOG might be effective in improving the enrollment of “placebound” students in counties not presently served by the program.

Question 2: To what extent does the EOG program influence urban, placebound students to pursue upper division coursework?

To answer this question, the enrollment patterns of three different groups of students who applied for an EOG for the 1998-99 school year were compared, to determine if they were equally likely to enroll in a four-year institution within the first year of EOG application. The three groups were:

- **EOG Recipients:** Students who received EOG funds during the 1998-99 school year.
- **EOG Eligible Non-Participants:** Students who were awarded EOG eligibility, but did not receive EOG funds during the 1998-99 school year.
- **EOG Denied Applicants:** Students who completed the application process, but did not meet EOG criteria of “placebound” and/or financial need.

Based on institutional enrollment data, 62 percent of the eligible non-participants did not enroll at a participating institution during the 1998-99 academic year. Conversely, 38 percent attended for at least part of the academic year without receiving an EOG. Some of these students, who appeared to be eligible based on their EOG application form but did not use a grant, enrolled at a branch campus and could not use the EOG. Others, who had anticipated achieving junior standing for the upcoming academic year, did not reach that goal. Still others may have been determined to be ineligible by the institution they attended for various other reasons, such as revised financial need, or failure to enroll for or complete enough credits.

It is interesting to note that there is little difference in the profiles of EOG participants and eligible non-participants, (see Table 2). Further statistical analysis, controlling for multiple factors, indicates that only a part of the difference in enrollment can be attributed to age, expected family contribution, financial need, gender, or race/ethnicity. The data revealed, however, that a higher percentage of non-enrolled, eligible non-participants had children, which may have influenced their enrollment decision. It was also interesting to note that a much higher percentage of eligible non-participants were from King County, where the job market may have influenced a decision to defer education, or where they may have attended other, non-participating institutions.

Conversely, significant differences were observed between EOG recipients and denied applicants. Applicants who were denied were younger, had a much higher expected family contribution, had less financial need, and were significantly more likely to be dependent on their parents for support. As a group, these students did not meet the definition of “placebound.” Ninety-one percent of the denied applicants enrolled at a participating institution during the 1998-99 academic year. One could reasonably conclude that the application process effectively identifies students who do, and who do not, need the grant in order to continue upper division programs, since the preponderance of denied applicants attended without the grant.

Table 2
1998-99 Sample Groups
EOG Recipients Compared to EOG-Eligible Non-Participants and Denied Applicants

Means and Frequencies of Selected Variables by Group

Variable	EOG Recipients n=149	EOG-Eligible Non-Participants n=71	EOG Denied Applicants n=150
Mean Age	27	29	24
Mean EFC	\$1,859	\$1,818	\$6,149
Mean Need	\$13,548	\$13,274	\$9,730
Gender			
Female	101 (68%)	46 (65%)	80 (53%)
Male	48 (32%)	25 (35%)	70 (47%)
Family Status			
Dependent	39 (26%)	13 (18%)	86 (57%)
Ind, Single	43 (29%)	17 (24%)	29 (19%)
Ind, Single, Child	34 (23%)	20 (28%)	8 (5%)
Ind Married	9 (6%)	4 (6%)	17 (11%)
Ind Married Child	24 (16%)	17 (24%)	10 (7%)
Race/Ethnicity			
White	90 (60%)	37 (52%)	93 (62%)
African American	10 (7%)	4 (6%)	8 (5%)
Native American	3 (2%)	1 (1%)	4 (3%)
Asian/Pacific Islander	19 (13%)	6 (8%)	15 (10%)
Latino/Hispanic	10 (7%)	6 (8%)	10 (7%)
Other/Unknown	17 (11%)	17 (24%)	20 (13%)
County			
Benton	3 (2%)	1 (1%)	2 (1%)
Clark	2 (1%)	1 (1%)	1 (1%)
Cowlitz	4 (3%)	1 (1%)	1 (1%)
Franklin	1 (1%)	0 (0%)	2 (1%)
King	38 (25%)	22 (31%)	30 (20%)
Kitsap	7 (5%)	5 (7%)	8 (5%)
Pierce	28 (19%)	11 (15%)	22 (15%)
Skamania	0 (0%)	0 (0%)	0 (0%)
Snohomish	10 (7%)	6 (8%)	20 (13%)
Spokane	30 (20%)	9 (13%)	30 (20%)
Thurston	9 (6%)	4 (6%)	15 (10%)
Walla Walla	3 (2%)	0 (0%)	4 (3%)
Yakima	14 (9%)	4 (6%)	10 (7%)
Unknown	0 (0%)	7 (10%)	5 (3%)

Conclusion

In summary, the Educational Opportunity Grant program appears to be responsive to its statutory goal of increasing the participation and completion of upper-division programs by placebound students. EOG recipients are much more likely to enroll than other students with similar characteristics who do not receive an EOG. Once enrolled, EOG recipients tend to complete as many, or more, credits than other upper division, aided students, even though they face many challenging barriers.

Part II: Consideration of Statutory or Regulatory Modifications

At the outset of the study, the Board determined that the review should consider whether current EOG program criteria are relevant in today's educational environment, or whether modifications should be proposed, given changes in higher education delivery since the program's establishment in 1990. Therefore, the study incorporated a review of student eligibility, institutional eligibility, and grant amounts. The issues addressed by the study and the Board's recommendations follow.

Issue 1: Should the EOG program continue to serve only urban placebound students who reside in counties served by branch campuses established under Chapter 28B.45 RCW, or should it be extended to eligible residents in all counties?

Background. RCW 28B.101.020(1) defines "placebound" as "unable to relocate to complete a college program because of family or employment commitments, health concerns, monetary inability, or other similar factors." Subsection (2) continues, "...A placebound resident is one who may be influenced by the receipt of an enhanced student financial aid award to attend an institution that has existing unused capacity rather than attend a branch campus who, because of family or employment commitments, health concerns, monetary need, or other similar factors, would be unable to complete an upper-division course of study but for receipt of an educational opportunity grant."

The 1987 Master Plan adopted by the HECB, which introduced the need for branch campuses (and subsequently the EOG program), indicated concern about the state's production of baccalaureate-degree recipients, citing access to baccalaureate institutions as a serious problem. It noted that "people of all ages and incomes can be placebound, but our older population is a large share." It noted that relocation is difficult and costly for placebound students who would find it difficult to find jobs in the rural areas in which most of the state's public baccalaureate institutions are situated, placing increased burden on the financial aid system. Particular concern was raised regarding the educational needs of the state's urban population.

The EOG program was established to make it financially possible for needy, placebound students who face multiple barriers to baccalaureate education to enroll in a local college or university, or to relocate to attend another institution. The law limits eligibility to students who live in counties served by branch campuses. As can be seen on the map in Appendix D, these counties are predominantly in the state's urban areas.

Discussion. Students served by the EOG program share characteristics that make it difficult to complete baccalaureate degrees. They are older, self-supporting, and primarily heads-of-household. Personal circumstances often prevent them from relocating to pursue upper division coursework.

The EOG program fills a unique and important niche by assisting this population. However, it is difficult to argue that students with those same characteristics who reside in the more rural counties not served by branch campuses are not at least as "placebound" as those who live in urban counties served by branch campuses. The current "county of residence" limitation creates inequities and does not respond to the needs of individuals from all parts of the state who face barriers that preclude baccalaureate degree completion.

Recommendation. The EOG program should continue to serve students who are placebound by virtue of their personal and family circumstances. However, eligibility should be extended to students from all counties.

Such a change is not anticipated to result in a large increase in the number of individuals applying for an EOG, since the population and college participation rates of the additional counties are significantly smaller than the urban counties that are currently eligible. (In 1998, 82 percent of the students enrolled in public four-year institutions were from counties that are currently eligible for the EOG program.)

Issue 2: Should other student eligibility criteria be modified? The study also considered whether other student eligibility criteria, as presently operationalized, should be modified.

Full Time Attendance. The EOG is designed as a two-year program to help upper division students complete a baccalaureate degree in a timely manner. (Third-year awards may be made to students in programs that traditionally require more than two years to complete, and who request continuation of the grant.) Although full-time enrollment is emphasized, recipients who attend at least half-time (six credits or more) continue to receive the full EOG as long as they meet the financial need criteria.

Discussion. EOG recipients tend to enroll full-time and, if possible, year-round, in order to complete their programs as quickly as possible and enter or re-enter the labor market. However, it is occasionally necessary for a recipient to attend less than full-time. Institutional aid administrators report that the at-risk population served by the EOG program needs to have the flexibility to attend less than full-time without losing grant eligibility. They recommend that, while emphasizing service to full-time students within the bounds set by total length of eligibility, the EOG program should permit otherwise eligible recipients to receive the grant for less than full-time attendance.

Recommendation. The EOG program should continue to encourage full-time attendance, but retain flexibility to assist recipients who need to temporarily reduce their course-load, as long as the student is enrolled at least halftime and is otherwise eligible for the grant.

Class Standing. The enabling legislation for the EOG program states in RCW 28B.101.020(2), “To be eligible for an educational opportunity grant, applicants must . . . have completed the associate of arts degree or its equivalent.” Rules adopted by the HECB (WAC 250-70-020(8)) define “associate of arts degree or equivalent” as coursework comparable to admission at the junior level or above by the enrolling institution.

Discussion. Students typically may apply for the EOG in anticipation of completion of a transfer degree and subsequent enrollment in a baccalaureate institution. They may be admitted to a four-year institution and begin study before their transcripts have been fully evaluated and class standing has been determined.

Grants are prorated to include only the terms in the academic year after which the student has officially achieved junior status. Eligibility is forfeited if junior standing is not attained by the start of winter term. In some cases, particularly when a student completes his or her transfer degree during summer term and immediately enrolls in a baccalaureate program for fall, institutions are unable to complete transcript evaluation in time to make a fall term EOG disbursement. In other instances, students may be required to complete prerequisites to be admitted to their major with junior standing. If they cannot complete the prerequisites prior to the start of winter term, they become ineligible for the full year. A more flexible system that provides a reasonable amount of time for transcript evaluation and attainment of junior standing would benefit program recipients.

Also, as specified in the enabling legislation, current HECB rules require recipients to complete an associate of arts degree or its equivalent, defined as coursework comparable to admission at the junior level or above by the enrolling institution. In recent years, community colleges have begun to award associate of science degrees, which are recognized as equivalent to the associate of arts degree.

Recommendations.

- 1.) The HECB should amend EOG rules to include other direct transfer degrees, such as the associate of science degree, for purposes of establishing EOG eligibility.
- 2.) An EOG recipient who has been awarded an associate of arts degree or its equivalent, as defined by the HECB, should be eligible to receive the grant upon transfer to a baccalaureate institution. However, to continue to receive the EOG, the student must have attained junior status by the end of the first term of the award.

Initial Eligibility and Renewability. Funding for the EOG program has varied widely from biennium to biennium. To avoid disruptions in study that might otherwise result for this population if grants were not renewable, the program has adopted a funding priority that first awards renewals, then new full-time applicants, and then third year petitions. As noted above, awards are generally available for two years, subject to the student's continuing eligibility and good standing. On a funds-available basis, students may receive grants for summer enrollment.

Discussion. Institutional financial aid administrators advise that the two-year award period is critical to the population served by the EOG program. They report that recipients are often anxious to complete their programs as quickly as possible, and suggest building greater flexibility into the program.

For example, EOG recipients could be better served if their initial awards could begin during any academic term, upon transfer to an eligible institution, and be used for up to two full years, including summer term. Subject to continuing eligibility, students would be advised that they could receive a specified maximum grant amount for attendance, up to a maximum number of academic terms. Given the characteristics of the recipient population, recipients should have the flexibility to "stop out" for one academic term without losing eligibility for the grant. However, since it is the goal of the program to encourage timely completion of the baccalaureate degree, recipients who fail to enroll for more than one term should be required to reapply for the grant, with the number of terms previously awarded counted toward their overall maximum.

These modifications would require development of administrative procedures to track student eligibility. Such procedures would not be difficult to implement, since similar tracking is done for other state financial aid programs.

Recommendation: EOG recipients should be able to receive their grant to begin upper division study during any academic term. New recipients should be advised that as long as they maintain eligibility, they may receive the EOG for up to eight quarters (or equivalent) of study. Renewability will not be forfeited if a student stops out for a single term during the academic year. However, students who fail to attend for more than one regular academic term during the period of their award will be required to reapply for the grant. If they are reawarded, previous terms of enrollment during which they received an EOG will count toward their total eligibility.

The HECB should design and implement administrative procedures necessary to track recipient eligibility.

Issue 3: Should institutional eligibility be reconsidered?

RCW 28B.101.040 specifies that “Grants may be used by eligible participants to attend any public or private college or university in the state of Washington that is accredited by an accrediting association recognized by rule of the Higher Education Coordinating Board and that has the capacity to accommodate such students within existing educational programs and facilities.” It also states, in the same section, that “Grants shall not be used to attend any branch campus or educational program established under chapter 28B.45.RCW” (the statute creating branch campuses).

Accreditation. Current EOG rules adopted by the HECB (WAC 250-70-030(1)) require that non-public baccalaureate institutions in the state of Washington be accredited by the Northwest Association of Schools and Colleges. In addition, the rules specify that any branch, extension or facility operating within the state of Washington, which is affiliated with an institution operating in another state, must be a separately accredited member institution of the Northwest Association.

Discussion. Washington students may pursue baccalaureate degrees from several out-of-state institutions that offer instruction in Washington State. Some of these institutions have provided baccalaureate instruction in Washington for many years. Although their parent campuses are accredited by the regional accrediting association for their area, they are not eligible to participate in state financial aid programs because their Washington locations are not separately accredited by the Northwest Association.

At the end of last year’s legislative session, a bill was introduced to amend the State Need Grant and State Work Study statutes. It sought to redefine “eligible institution” to include branch campuses of a member institution of an accrediting association, recognized by rule of the Board, as long as the branch is eligible for federal student financial aid programs and has operated as a nonprofit entity, delivering on-site classroom instruction within the state of Washington for a minimum of ten consecutive years. It is anticipated that the bill will be reintroduced during the 2001 Legislative Session. Rules defining institutional eligibility for the EOG program could also be so amended.

Although the number of EOG recipients who would opt to attend these out-of-state branch campuses is expected to be minimal, there is no logical rationale to exclude them from participation as long as adequate safeguards are in place to ensure reasonable administrative capability and consumer protection. At a minimum, such educational sites should be required to participate in the State Need Grant and federal financial aid programs, since EOG recipients are dependent on other sources of financial aid in order to attend. In addition, they should be required to demonstrate that they are willing and able to properly administer the program.

Recommendation. Should the Legislature modify State Need Grant statute to extend eligibility to branches of accredited nonprofit institutions from other states, EOG rules should be amended to correspond. At a minimum, an institution, branch, extension, or facility operating within the state of Washington, which is affiliated with a regionally accredited, nonprofit institution in another state must:

- Have delivered on-site classroom instruction within the state of Washington for a minimum specified period of time,
- Be fully certified and participate in federal student financial aid programs;
- Be eligible and participate in the Washington State Need Grant program; and
- Provide necessary assurances of administrative capability.

All eligible institutions must agree to, and comply with, program rules and regulations adopted by the Higher Education Coordinating Board, as well as procedures specified by the Board for program administration.

Capacity. Current law indicates that recipients may use the EOG only at eligible institutions “which have the capacity to accommodate such students within existing educational programs and facilities.” (RCW 28B.101.010.)

Discussion. Institutional capacity is a function of physical space and scheduling. The “existing capacity” criterion of the enabling legislation for the EOG program was based on the presumption that the state would realize cost savings if students would attend established institutions that had physical space and could accommodate them in existing programs (rather than requiring space/programs at one of the new branch campuses).

The EOG program was proposed when public institutions were subject to enrollment lids and when each was assigned a geographic service area. With elimination of both enrollment lids and service areas, “existing capacity” has become a meaningless term.

Recommendation. References to attendance at institutions with existing unused capacity should be eliminated.

Branch Campuses. As previously noted, the EOG program was adopted as one of three strategies to increase upper division and graduate enrollment. The other strategies were to lift enrollment lids at the public baccalaureate institutions, and to establish branch campuses to serve upper division and graduate students living in the state’s urban areas.

The enabling legislation for the EOG program specified that the grants could not be used at branch campuses for two reasons: (1) To encourage students to attend existing institutions, thereby reducing construction and operating costs of the new branch campuses, and (2) To mitigate concerns of the independent colleges in areas to be served by branch campuses that the new branch campuses would negatively impact their enrollments. Now that the branches have been in existence for several years, some question whether the restriction should be eliminated.

Discussion. Compelling arguments are made for continuing to limit EOG eligibility to non-branch campuses, as well as for permitting recipients to use their grants to attend a branch campus.

Proponents of the current program argue that it is much more cost effective for the state to provide a \$2,500 EOG for a student to attend an independent college or university, than it is for the EOG recipient to attend a public institution, where it costs the state considerably more to provide instructional support. It is their position that it would cost the state even more money if EOG recipients attended branch campuses, since operating costs are higher at the branch campuses than at other state institutions, and since, in some locations, the increased enrollment pressures created by the added enrollments could result in the demand for additional capital construction.

Proponents who support allowing EOG recipients to use their grants at the branch campuses argue that, since the branch campuses have been built, it makes sense to maximize available space. They assert that the branch campuses are on a capital project schedule that does not respond quickly to increased demand, and that the EOG program would have little or no impact on further capital development. They believe that EOG recipients should be allowed to choose the program and institution that best responds to their educational goals, and that that choice should include programs offered by the branch campuses.

Also at issue is an inconsistency which, while prohibiting EOGs to be used at branch campuses, permits their use at other extension centers and educational sites of public baccalaureate institutions. Students may not, for example, use their EOG to attend UW's Tacoma branch campus, but they may enroll in TESC's Tacoma site, or at CWU's SeaTac Center. Such is the case because language in the EOG statute is specifically linked to legislation establishing the branch campuses.

The program's relatively small size appears to have marginalized its effects on branch campus development. And, as capital and operating costs at the branch campuses have decreased over earlier years, it is difficult to make a strong case that it would cost the state substantially more to provide baccalaureate instruction at a branch campus than at another state-supported college or university.

Recommendation. Based on the HECB's commitment to provide all students, including financial aid recipients, with the ability to select the program and eligible institution that best responds to their educational goals, and given the fact that branch campuses have been built and provide instruction for upper division students, placebound students should be able to use their EOG to attend a branch campus.

Issue 4: Grant amounts. Legislation creating the EOG program specifies that the grant amount will be “up to two thousand five hundred dollars per academic year, not to exceed the student’s demonstrated financial need for the course of study.” (RCW 28B.101.040.)

Discussion. The original grant amount has not been updated since the program was established 10 years ago. When the grant amount was set, \$2,500, together with other grants the EOG recipient was presumed eligible to receive, represented about one-half the amount of tuition at independent colleges and universities. Grants of this size were reported by researchers as having a positive impact on student retention.

The grant amount was set in statute with no mechanism in place for updating to reflect increases in college costs, availability of other grant assistance, or other factors that would indicate the need for adjustment.

Recommendation. Authority to establish grant amounts should be vested with the Higher Education Coordinating Board. Grant amounts should be set by the Board, taking into account such factors as the costs of attendance and the availability of other grant assistance.

CONCLUSION

This review reaffirms the role of the Educational Opportunity Grant program as an integral part in the state’s overall strategy to improve the baccalaureate degree completion rate of the state’s citizens. By providing a supplemental grant to students who are placebound by family, financial, health, or employment considerations, the program enables recipients to enroll in a four-year college or university that they could not otherwise afford to attend.

The program appears to be responsive to its statutory goal of increasing the participation and completion of baccalaureate programs by placebound students. Recipients are much more likely to enroll than other students with similar characteristics who do not receive an EOG. Once enrolled, EOG recipients tend to complete as many, or more, credits than other upper division, aided students, even though they face many barriers to participation.

The program does not replicate other existing financial aid programs. Its focus on serving upper division, placebound students, as well as its use in replacing loans or in meeting financial needs not addressed by other financial aid programs, make it unique.

The status of the EOG program should be changed from a demonstration project to a permanent part of the state’s complement of financial aid programs for needy students.

APPENDICES

Appendix A: Summary of Issues and HECB Policy Committee Draft Recommendations

Appendix B: Chapter 28B.101 RCW

Appendix C: Educational Opportunity Grant: Summary of Year-End Data, 1990-91 – 1999-00

Appendix D: Map of EOG-Eligible Counties

EDUCATION OPPORTUNITY GRANT STUDY
SUMMARY OF ISSUES AND HECB POLICY COMMITTEE DRAFT RECOMMENDATIONS

CURRENT PROGRAM	HECB RECOMMENDATION	CHANGE REQUIRED
Student Eligibility		
A student must be a state resident.	No change recommended.	N/A
A student must reside in a county served by a branch campus.	The HECB finds no justification for limiting program participation to persons residing in certain counties and therefore recommends that county of residence requirements be eliminated.	Statutory change
A student must be “placebound.” Placebound is defined as unable to relocate to complete a college program because of family or employment commitments, health concerns, monetary inability or other similar factors.	The HECB recommends that the program continue to serve students who are placebound by virtue of their personal and family circumstances. However, the program should be extended to include placebound students from all counties.	Statutory change
A student must have financial need.	No change recommended.	N/A
A student must attend full time.	The program should continue to encourage full-time attendance, but retain flexibility to assist recipients who find it necessary to temporarily reduce their courseload, so long as the student is otherwise eligible for the grant.	N/A
A student must have completed an Associate of Arts Degree or its equivalent. Currently “or its equivalent” is defined as being at junior level class standing as determined by the baccalaureate institution.	The Board intends to expand the definition of “or its equivalent” to include other direct transfer degrees, such as the Associate of Science Degree. The Board further intends to permit EOG recipients to receive the grant upon transfer into a baccalaureate institution, with continuing eligibility contingent upon having attained junior status by the end of the first term of award.	Board action
A student may not be involved in a program that includes religious worship, exercise, or instruction or the pursuit of any degree in religious, seminarian, or theological academic studies.	No change recommended.	N/A
A student must maintain satisfactory progress as determined by policy of the institution in which they are enrolled.	No change recommended.	N/A

CURRENT PROGRAM	HECB RECOMMENDATION	CHANGE REQUIRED
Initial Eligibility and Renewability		
Grants are generally available for two years, but may be extended to a third year for students in longer programs. On a funds-available basis, students may receive grants for summer enrollment. Typically, grants are awarded for study beginning fall term.	The Board intends to implement administrative procedures to allow grant periods to begin during any academic term upon the student's transfer to an eligible institution. Students may be awarded grants for up to eight quarters (or equivalent) of study. Renewability will not be forfeited if a student stops out for a single term during the academic year. However, students who fail to attend for more than one regular academic term during the period of their award will be required to reapply for the grant. If they are reawarded, previous terms of enrollment during which they received an EOG will count toward their total eligibility.	Board action
Institutional Eligibility		
Participating institution must confer baccalaureate degrees.	No change recommended.	N/A
Participating institution must be accredited by the Northwest Association of Schools and Colleges	<p>If legislation is adopted to amend institutional eligibility for the State Need Grant program, the Board intends to expand recognition of accredited institutions for the EOG program, as well. Subject to such legislative action, the Board will amend EOG rules to include an institution, branch, extension, or facility operating within the state of Washington, which is affiliated with a regionally accredited nonprofit institution in another state which:</p> <ul style="list-style-type: none"> ◆ Has delivered on-site classroom instruction within the state of Washington for a minimum specified period of time; ◆ Is fully certified, and participates in federal student financial aid programs; ◆ Is eligible, and participates in the Washington State Need Grant program; and, ◆ Provides necessary assurances of administrative capability. 	Statutory change may be desirable; Requires Rule Revision

CURRENT PROGRAM	HECB RECOMMENDATION	CHANGE REQUIRED
Institutional Eligibility (cont.)		
Branch campuses or educational programs established under chapter 28B.45 RCW are not eligible for participation.	<p>The Board recommends that eligibility be extended to recipients who wish to enroll at a branch campus. The Board recognizes that exclusion of the branch campuses was an integral element of the program’s initial purpose. The grant was intended to affect student behavior by creating an incentive for students living in counties served by the branch campuses to select other institutions in their geographic area. It was felt that by decreasing demand on the branch campuses the state could reduce both the operating and capital budget impact of developing the branch campuses. Because of its small size, the program has been unable to clearly demonstrate such savings.</p> <p>Further, the HECB’s 2000 Master Plan calls for higher education to “place learners at the center of decision making.” Based on the Board’s commitment to provide all students, including financial aid recipients, with the ability to select the program and eligible institution that best responds to their educational goals, and given the fact that branch campuses have been built and provide instruction for upper division students, EOG recipients should be able to use their grants to attend a branch campus, if that is their choice.</p>	Statutory change
Participating institution must have unused capacity.	The HECB recommends that the concept of unused institutional capacity be eliminated from the EOG program. At the time the program was designed, the state’s public institutions were subject to enrollment lids. Removal of the enrollment lids and the ability of public institutions to manage their own decisions regarding over-enrollment make the concept of unused capacity irrelevant in today’s higher education environment.	Statutory change
Institutions must enter into an agreement to participate with the HECB.	No change recommended.	N/A

CURRENT PROGRAM	HECB RECOMMENDATION	CHANGE REQUIRED
Award Amount		
Grant amount is \$2,500 per academic year.	The Board recommends that reference to a specific grant amount in the statute be replaced with language authorizing the Board to set grant amounts, taking into account such factors as the costs of attendance and the availability of other grant assistance.	Statutory change
Other		
The Educational Opportunity Grant program is defined in statute as a demonstration project.	The HECB recommends that the language referencing “demonstration project” be removed from the statute. The program has been existence for ten years and has demonstrated its ability to increase persistence rates among grant recipients. Therefore, the Board supports continuation of the EOG as an on-going program which complements the state’s other financial aid programs.	Statutory change

HECB
10/10/00

Chapter 28B.101 RCW Educational Opportunity Grant Program Placebound Students

Sections

28B.101.005	Finding - Intent
28B.101.010	Program Created
28B.101.020	Definition - Eligibility
28B.101.030	Administration of Program - Payments to Participants
28B.101.040	Use of Grants

RCW 28B.101.005 Finding - Intent

The legislature finds that many individuals in the state of Washington have attended college and received an associate of arts degree, or its equivalent, but are placebound.

The legislature intends to establish an educational opportunity grant program for placebound students who have completed an associate of arts degree, or its equivalent, in an effort to increase their participation in and completion of upper-division programs. [1990 c 288 § 2.]

RCW 28B.101.010 Program Created

The educational opportunity grant program is hereby created as a demonstration project to serve placebound financially needy students by assisting them to obtain a baccalaureate degree at public and private institutions of higher education which have the capacity to accommodate such students within existing educational programs and facilities. [1990 c 288 § 3.]

RCW 28B.101.020 Definition - Eligibility

- (1) For the purposes of this chapter, "placebound" means unable to relocate to complete a college program because of family or employment commitments, health concerns, monetary inability, or other similar factors.
- (2) To be eligible for an educational opportunity grant, applicants must be placebound residents of the state of Washington who are needy students as defined in RCW 28B.10.802(3) and who have completed the associate of arts degree or its equivalent. A placebound resident is one who may be influenced by the receipt of an enhanced student financial aid award to attend an institution that has existing unused capacity rather than attend a branch campus established pursuant to chapter 28B.45 RCW. An eligible placebound applicant is further defined as a person whose residence is located in an area served by a branch campus who, because of family or employment commitments, health concerns, monetary need, or other similar factors, would be unable to complete an upper-division course of study but for receipt of an educational opportunity grant. [1990 c 288 § 4.]

RCW 28B.101.030 Administration of Program - Payments to Participants

The higher education coordinating board shall develop and administer the educational opportunity grant program. The board shall adopt necessary rules and guidelines and develop criteria and procedures to select eligible participants in the program. Payment shall be made directly to the eligible participant periodically upon verification of enrollment and satisfactory progress towards degree completion. [1990 c 288 § 5.]

RCW 28B.101.040 Use of Grants

Grants may be used by eligible participants to attend any public or private college or university in the state of Washington that is accredited by an accrediting association recognized by rule of the higher education coordinating board and that has an existing unused capacity. Grants shall not be used to attend any branch campus or educational program established under chapter 28B.45 RCW. The participant shall not be eligible for a grant if it will be used for any programs that include religious worship, exercise, or instruction or to pursue a degree in theology. Each participating student may receive up to two thousand five hundred dollars per academic year, not to exceed the student's demonstrated financial need for the course of study. Resident students as defined in RCW 28B.15.012(2)(e) are not eligible for grants under this chapter. [1993 sp.s. c 18 § 35; 1993 c 385 § 2; 1990 c 288 § 6.]

NOTES:

Reviser's note: This section was amended by 1993 c 385 § 2 and by 1993 sp.s. c 18 § 35, each without reference to the other. Both amendments are incorporated in the publication of this section pursuant to RCW 1.12.025(2). For rule of construction, see RCW 1.12.025(1).

Effective date--1993 sp.s. c 18: See note following RCW 28B.10.265.

**EDUCATIONAL OPPORTUNITY GRANT:
SUMMARY OF YEAR-END DATA***

	1990-91		1991-92		1992-93		1993-94		1994-95	
Public	Awards #	Expend. \$	Awards #	Expend. \$	Awards #	Expend. \$	Awards #	Expend. \$	Awards #	Expend. \$
UW			6	15,000	15	35,384	13	30,834	8	20,835
WSU			2	2,500	13	30,870	11	26,250		
CWU	4	9,167	21	46,840	27	58,255	15	35,834	10	24,167
EWU	20	43,752	42	92,659	48	113,510	26	61,535	28	69,170
TESC	7	13,966	15	28,645	8	17,793	1	2,500		
WWU	1	2,500	1	2,500	3	7,500	8	18,334	6	15,000
Total Public	32	69,385	87	188,144	114	263,312	74	175,287	52	129,172
Private										
Bastyr	2	3,334	5	12,500	7	15,522	2	5,000	1	2,500
Cornish										
Gonzaga	16	38,750	23	52,500	32	77,500	29	66,732	20	48,334
Heritage	11	26,250	12	28,750	29	67,500	17	40,000	9	28,750
NW College	1	2,500	1	2,500			1	2,500		
PLU	65	133,750	100	228,750	82	179,538	41	96,250	42	108,750
St Martins	7	12,500	12	20,000	5	12,500	1	2,500	2	5,000
SPU	15	38,334	32	65,598	33	75,638	19	44,168	8	18,336
SU	15	29,903	68	144,170	87	195,766	42	98,336	21	50,836
UPS	30	70,000	48	115,000	36	83,750	23	53,750	7	20,000
Walla Walla	5	10,834	6	10,000	2	5,000	1	2,500		
Whitman	1	2,500	5	12,500	9	22,500	7	17,500	2	5,000
Whitworth	9	21,250	17	42,500	13	32,500	7	17,500	3	8,750
City Univ.					1	1,667				
Total Private	177	389,905	329	734,768	336	769,381	190	446,736	115	296,256
Combined Total	209	\$459,290	416	\$922,912	450	\$1,032,693	264	\$622,023	167	\$425,428

* Expenditures include federal SSIG supplement and supplemental summer awards.

**EDUCATIONAL OPPORTUNITY GRANT:
SUMMARY OF YEAR-END DATA***

	1995-96		1996-97		1997-98		1998-99		1999-00	
Public	Awards #	Expend. \$	Awards #	Expend. \$	Awards #	Expend. \$	Awards #	Expend. \$	Awards #	Expend. \$
UW	10	23,334	23	50,000	44	115,007	81	201,681	87	213,996
WSU	4	8,750	24	70,000	77	207,008	87	234,151	117	308,319
CWU	12	27,502	67	159,705	150	423,560	203	463,054	171	454,395
EWU	36	87,501	61	151,249	109	275,328	160	402,505	165	434,350
TESC	2	3,230	4	10,834	12	34,170	48	120,844	53	114,810
WWU	4	9,167	3	10,000	8	19,437	23	68,342	33	89,163
Total Public	68	159,484	182	451,788	400	1,074,510	554	1,490,577	626	1,615,033
Private										
Bastyr	1	2,500	4	10,000	15	42,505	19	50,838	18	50,831
Cornish					1	2,500	1	2,500	1	2,500
Gonzaga	26	63,750	38	93,750	48	130,825	49	141,250	52	135,000
Heritage	11	22,500	22	56,666	44	118,750	37	107,892	23	71,250
NW College										
PLU	57	136,250	55	121,250	88	225,414	99	262,284	99	253,750
St Martins			10	23,750	47	123,750	59	163,750	44	113,635
SPU	21	49,166	35	85,834	36	83,780	34	86,669	38	95,663
SU	23	53,334	39	94,166	89	226,675	94	221,598	52	128,332
UPS	8	17,500	23	50,000	32	82,500	29	70,496	22	53,750
Walla Walla										
Whitman	2	3,750	1	2,500	3	6,250	3	6,250	1	1,250
Whitworth	3	7,500	9	20,000	26	76,250	23	58,750	9	22,500
City Univ.										
Total Private	152	356,250	236	557,916	429	1,119,199	452	1,172,277	361	928,461
Combined Total	220	\$515,734	418	\$1,009,704	829	\$2,193,709	1006	\$2,662,854	987	\$2,543,494

* Expenditures include federal SSIG supplement and supplemental summer awards.

RESOLUTION NO. 00-55

WHEREAS, The Legislature established the Educational Opportunity Grant (EOG) program in 1990 to address the need for greater access to baccalaureate education for placebound residents of counties served by branch campuses; and

WHEREAS, The Legislature vested in the Higher Education Coordinating Board (HECB) the responsibility to adopt policies and administer the EOG program within the framework established by statutes; and

WHEREAS, The HECB periodically reviews policies and administrative procedures for the state-funded financial aid programs for which it has statutory responsibility; and

WHEREAS, The HECB has completed a study of the EOG program's effectiveness in achieving the goals of the enabling legislation and has considered whether modifications should be proposed, given changes that have occurred in higher education delivery since 1990, when the program was established; and

WHEREAS, The HECB's review has reaffirmed that the EOG program is responsive to its statutory goal of increasing the participation and completion of upper division programs by citizens who face barriers to degree completion by virtue of family, financial, health, or employment considerations; and

WHEREAS, The HECB's review has further confirmed that the program with its focus on either reducing loans or meeting otherwise unmet financial needs of upper division, placebound students complements other student financial aid programs; and

WHEREAS, The HECB has determined that the following modifications would enable the EOG program to better meet the needs of placebound residents who face multiple barriers to baccalaureate education;

THEREFORE, BE IT RESOLVED, That the HECB adopts the report and following recommendations for program modifications:

1. **County of Residence.** Eligibility should be expanded to residents of all counties.
2. **Branch Campuses.** Eligibility should be extended to students who wish to enroll at state-supported branch campuses, enabling recipients to select the program and eligible institution that best responds to their educational goals.
3. **Institutional Participation.** Institutional eligibility should be extended to branch campuses, extension sites, and educational facilities that operate within the state of Washington, that are affiliated with regionally accredited nonprofit institutions in another state, and meet the following criteria:
 - Have delivered on-site classroom instruction within the state of Washington for a minimum specified period of time;
 - Are fully certified and participate in federal student financial aid programs;
 - Are eligible for and participate in the Washington State Need Grant program; and,
 - Provide necessary assurances of administrative capability.

4. **Grant Amounts.** Grant amounts should be established by rule of the Board, rather than in statute, so that they may be periodically adjusted, as necessary, to reflect such factors as changes in the costs of attendance and the availability of other grant assistance.
5. **Period of Award.** Administrative procedures should be modified to permit grant periods to begin during any academic term upon the student's transfer to an eligible institution, with continuing eligibility contingent upon attainment of junior status by the end of the first term of award, with a maximum award period of eight quarters (or equivalent).
6. **Transfer Degrees.** The enabling legislation should be amended to include reference to the Associate of Science degree as an appropriate transfer degree for purposes of establishing eligibility for the EOG.
7. **"Unused Institutional Capacity."** The concept of "unused institutional capacity" is no longer relevant, and its reference should be eliminated.
8. **Program Status.** Reference to the EOG program as a demonstration project should be deleted, and the program should be continued as an ongoing program that complements the state's other financial aid programs.

AND BE IT FURTHER RESOLVED, That the Board directs staff to forward the report and recommendations to the chairs of the Senate and House Higher Education Committees and other interested legislators for their consideration, and to begin the public rulemaking process to modify program regulations at the appropriate time.

Adopted:

December 6, 2000

Attest:

Bob Craves, Chair

Kristi Blake, Secretary