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## Report on Data Verification of State Funded Scholarships and Grants May 11, 2022

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The Commission on Higher Education (the Commission) performed the following procedures to assist in evaluating Midlands Technical College's administration of the LIFE Scholarship, Need-Based Grant, and National Guard College Assistance Program awards for the 2020-2021 academic year.

The purpose of the data verification review was to evaluate whether systems are in place to adequately administer recipient awards in accordance with the provisions of the act, regulations, pertinent statutes, and program guidelines. Our testing did not include the entire population of recipients, rather procedures were performed on a randomly selected sample of recipients.

The procedures and the associated findings are as follows:

1. We obtained a copy of Midlands Technical College's policy for awarding state scholarships and assistance programs.
2. We obtained the State's act, regulations, statutes, and program guidelines for the scholarship and grant programs funded by the State of South Carolina.
3. We reconciled invoices paid by the Commission to the Commission on Higher Education Management Information System (CHEMIS) and the institution's disbursement report generated by Ellucian Colleague, Midlands Technical College Information Management System.
4. We obtained from CHEMIS the detail of scholarships and assistance awards disbursed during the period from July 1, 2020 through June 30, 2021. We selected a random sample of twenty-five LIFE Scholarships, twenty-five Need-based grants, and eight National Guard College Assistance awards and performed the following procedures for each sample item, as applicable:



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*General Eligibility Requirements for State Supported Scholarships/Grants (LIFE, Need-based Grants):*

1. We inspected paper student financial aid records, which included information from Ellucian Colleague and Datatel, for indication of the following:
  - a. Recipient is a U.S. Citizen or legal permanent resident that meets the definition of an eligible non-citizen under State residency statutes whose lawful presence has been verified at the time of enrollment at the institution;
  - b. Recipient is a resident of South Carolina for in-state purposes at the time of high school graduation and at the time of enrollment at the institution, as set forth by Section 59-11-10, and be either a member of a class graduating from a high school located in this State, or a student who has successfully completed at least three of the final four years of high school within this State, or a home school student who has successfully completed a high school home school program in this State in the manner required by law, or a student graduating from a preparatory high school outside this State, while a dependent of a parent or guardian who is a legal resident of this State and has custody of the dependent according to State Statute, Section 59-149-50A, or a student whose parent or guardian has served in or has retired from one of the United States Armed Forces within the last four years, paid income taxes in this State for a majority of the years of service, and is a resident of this State;
  - c. Recipient is a graduate of an approved high school or equivalent program;
  - d. Recipient is admitted, enrolled full-time (LIFE or Need-based grant) or part-time (Need-based grant), and classified as a degree-seeking student at a public or independent institution in South Carolina;
  - e. Recipient certified that he/she has not defaulted and does not owe a refund or repayment on any federal or state financial aid;
  - f. Recipient certified that he/she has never been adjudicated delinquent, convicted, or pled guilty or nolo contendere to any felonies or any second subsequent alcohol/drug related offenses under the laws of this state or any other state or under the laws of the United States.
2. We inspected documentation for indication that the recipient completed an annual affidavit regarding felonies and loan default prior to being awarded a state scholarship each year.

Finding(s): No exceptions were found as a result of the procedures.

## *Eligibility Attribute Testing for LIFE Scholarship*

### **Initial Eligibility for LIFE Scholarship Incoming Students**

1. We verified that the recipient met the following academic eligibility requirement by obtaining a copy of the high school transcript obtained by the Admissions office:
  - a. Recipient earned a minimum 3.0 cumulative GPA on the SC UGP scale as documented on the final official transcript
2. We viewed student registrations to confirm the recipient was enrolled in at least twelve hours of non-remedial/developmental, non-continuing education or degree-credit courses at the time the scholarship funds were disbursed.
3. We viewed financial aid award documentation for indication that the recipient did not receive Lottery Tuition Assistance in addition to the LIFE scholarship in the same academic year.

### **Additional Eligibility for Transferring Students**

1. We viewed academic transcripts for indication that:
  - a. Recipient earned a cumulative LIFE GPA of 3.0 or higher and
  - b. Recipient met the annual credit hour requirement based on his/her initial enrollment date in a degree seeking program.
2. We viewed financial aid award documentation for indication that the recipient did not receive Lottery Tuition Assistance in addition to the LIFE scholarship in the same academic year.

### **Continuing Eligibility**

1. We viewed academic records for indication that each recipient selected for verification:
  - a. Earned a cumulative LIFE GPA of 3.0 or higher by the end of each academic year, which excluded remedial/developmental course grades;
  - b. Received the award in one of two consecutive terms for a one-year program or four consecutive terms for an associate/two-year program from the time of initial college enrollment;
  - c. Met the annual credit hour requirement based on the initial college enrollment date in a degree seeking program.
2. We verified that the student completed the annual re-certification(s) regarding residency, convictions, transcripts, and loan default.
3. We viewed award notifications and disbursement records for indication that the recipient did not receive Lottery Tuition Assistance in addition to the LIFE Scholarship in the same academic year.

Finding(s): No exceptions were found as a result of the procedures.

## *Eligibility Attribute Testing for Need-based Grants*

### **Initial Eligibility for Need-based Grant Recipients**

1. We viewed the recipient's file for indication that the recipient completed the Free Application for Federal Student Aid (FAFSA), and following the need analysis established by Title IV was identified as a needy student.
2. We verified the recipient was enrolled for at least six hours of credit for a part-time award, and at least twelve hours for a full-time award.
3. For students who have previously earned credit hours and are applying for the grant for the first time, we reviewed transcripts from all institutions to verify that the recipient earned at least a cumulative 2.0 GPA on a 4.0 scale for graduation purposes at the end of the academic year preceding the award.

### **Continuing Eligibility**

1. We viewed academic records for indication that each recipient selected for verification:
  - a. Reapplied for the award by submitting the FAFSA each academic year, and continued to meet all general eligibility requirements;
  - b. Completed the minimum number of credit hours each academic year based on his/her enrollment status for awarding purposes;
  - c. Earned at least a cumulative 2.0 GPA on a 4.0 scale for graduation purposes at the end of the preceding academic year;
  - d. Met satisfactory academic progress (SAP) as defined by the College's policy for the purpose of complying with Title IV regulations for Federal Student Aid Programs.
2. We viewed academic records to determine that each recipient had not received a Need-based grant for more than a maximum of eight full-time equivalent semesters.
3. We viewed the annual certification for confirmation that the student attested that he/she has not earned a baccalaureate degree.

Finding(s): No exceptions were found as a result of the procedures.

### *Scholarship Award Disbursement Testing*

1. We traced award amounts to the student's account detail to determine that the awarded amounts were identifiably credited to the recipient's account.
2. We compared total award disbursements for the academic year as reflected on the award letter to CHEMIS data submitted to the Commission on Higher Education.
3. We compared total award disbursements for the academic year as reflected on the award letter to the following legislatively established award amounts:
  - a. LIFE Scholarship:
    - i. The published cost-of-tuition for thirty credit hours plus a three-hundred-dollar book allowance, not to exceed \$5,000 per academic year
    - ii. Award amount not applied to costs of continuing education or remedial/developmental courses
    - iii. The award amount in combination with all other gift aid, including Federal, State, private and institutional funds did not exceed the cost-of-attendance for as defined in Title IV regulations for any academic year
  - b. Need-based grant:
    - i. The published cost of attendance, with limitations on room and board charges, not to exceed \$1,250 per eligible part-time student and \$2,500 per eligible full-time student per academic year based on the College's allocated funds for Need-based grants and other financial aid awarded to participants
    - ii. A maximum of fifty percent of the grant was disbursed for two terms of the academic year
    - iii. Award amount was determined after applying all other sources of gift aid to the total cost-of-attendance before determining unmet need

Finding(s): No exceptions were found as a result of the procedures.

### *National Guard College Assistance Program Testing*

1. We verified that the recipient had valid tuition and fee expenses for the academic year under review.
2. We reviewed the enrollment status to ensure awards were prorated in accordance with the Pell Grant Model if not enrolled full-time.
3. We determined that the annual award amount was less than the published cost of attendance.
4. We determined that the recipient's total program benefits received was less than \$18,000 and that the recipient has earned less than 130 credit hours since initial eligibility into the college assistance program.
5. We traced the award amount in the financial aid award letter to the student's account detail.

Finding(s): No exceptions were found as a result of the procedures.

### *Record Retention*

We determined if Midlands Technical College retained in the student files the following information for each scholarship/grant recipient:

1. Certification that the student has no convictions of felonies and/or a second or subsequent alcohol/drug-related misdemeanor offense
2. Certification that the student has not defaulted and does not owe a refund or repayment on any federal or state financial aid
3. All transcripts for previous and current institutions attended
4. Award letter and terms of award
5. Verification of a 3.0 "LIFE GPA" for LIFE Scholarship recipients, and cumulative 2.0 GPA for need-based grant recipients

Finding(s): No exceptions were found as a result of the procedures.

This report is intended solely for the information and use of management of Midlands Technical College and the South Carolina Commission on Higher Education, and it is not intended to be and should not be used by anyone other than these specified parties.

*Christina Seale*

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