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## Update on the Commission's GPA Verification Process

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### Issue

At the November 29, 2004 teleconference of the Commission's Grants and Programs Committee, Max Espinoza and Mary Lindsey presented the Grant Advisory Committee Review of the Cal Grant High School GPA. The Committee reviewed and acted on the following options:

- Option 1: Shift the burden of submitting GPAs from students to high schools
- Option 2: Maintain student responsibility but increase high school submission of GPA's
- Option 3: Eliminate student responsibility for submitting verified GPA by increasing high school GPA submissions and providing for a secondary clean up process
- Option 4: Utilize a transcription evaluation service

### Background and Methodology

1. The Committee discussed the definition of remedial coursework at high schools. It was noted that it was left up to the individual high school to define remedial coursework at their school. The Committee agreed that until the statute could be changed that term remedial should be defined as any course not counted toward high school graduation.
2. The Committee further agreed that staff work with the Department of Education toward the removal of remedial language from the statute governing the GPA calculation.
3. The Committee recommended that the Commission pursue option 1 with the goal of shifting the burden of submitting GPAs from students to high schools.
4. In addition, the Committee recommended that staff study option 3 and pursue getting the assistance of the Superintendent of Public Instruction in getting high schools to submit GPAs to the Commission for Cal Grant purposes.

### Status

1. In response to this recommendation the definition of remedial has been changed in all Commission publications.
2. This change was included in a version of AB1241 but was removed prior to the final version due to perceived cost issues.
3. Staff worked with legislative staff in development of AB 1241. A copy of the bill is included for you review. The Governor has vetoed AB 1241. A copy of the veto message is included.
4. Staff is working to develop Memorandum of Understanding (MOU) between Superintendent of Public Instruction (SPI) and the Commission for the release of student information related to the award of student financial aid. The SPI has indicated they may release a letter of encourage to high schools rather than pursue the MOU.

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**BACKGROUND**

The Entitlement Cal Grant program provides academically qualified and financially needy high school seniors a guarantee of money for college. The application process requires the student to file a Free Application for Federal Student Aid (FAFSA) and to provide the California Student Aid Commission (Commission) with a verified high school Grade Point Average (GPA) by a March 2<sup>nd</sup> deadline.

**Legislative Requirement**

On 2003, the Legislature passed SB 680 requiring the Commission to review the existing formula for calculating high school GPAs to ensure fair and equal treatment.

Senate Bill 680 (CHAPTER 795, Statutes of 2003) states:

SECTION 1 (a) The Student Aid Commission shall convene an existing advisory committee to review the existing formula for calculating high school grade point averages under the Ortiz-Pacheco-Poochigian-Vasconcellos Cal Grant Act. The commission shall report the findings and recommendations of the committee to the Legislature, as part of the report required pursuant to Section 69437.7 of the Education Code, prior to December 31, 2004. Members of the committee shall include, at a minimum, representatives of the high school community, as well as representatives of the California Community Colleges, the California State University, the University of California, the Association of Independent California Colleges and Universities, the California Postsecondary Education Commission, and the Superintendent of Public Instruction.

**Grant Advisory Committee Charge**

At its October 2003 meeting the Grant Advisory Committee (GAC) charged the Workgroup on High School GPA Issues with:

“There is a need to address high school GPA issues that limit school reporting of Cal Grant GPAs. The issues include privacy concerns, limitation in data available for matching FAFSAs and GPAs, and the uniqueness of the Cal Grant GPA. SB 680, which has been approved by the Legislature and is on the Governor’s desk, would require the Commission to utilize its existing Grant Advisory Committee process to review the formula for calculating high school GPA’s and to report its findings and recommendations to the Legislature.”

The two charges of the workgroup are closely related. One of the barriers to 100% submission of GPAs by high schools is the calculation of a Cal Grant specific GPA.

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To better understand the issue, one must understand the definition of a Cal Grant GPA as well as the collection process.

**What Is a Cal Grant High School GPA?**

Prior to SB 1644, the question of what measure of academic performance was most appropriate for Cal Grant purposes was discussed by the Commission at various points in the past. After each discussion, the Commission reaffirmed its decision to use GPA as the primary measure of academic performance for the purposes of determining Cal Grant eligibility. The Cal Grant GPA originally corresponded to the GPA used by the California State University (CSU), but the CSU has since changed their measure to match that of the UC. Test scores were to be used as an alternative only in cases where a high school GPA was not available or was no longer a relevant measure of academic performance.

The Ortiz-Pacheco-Poochigian-Vasconcellos Cal Grant Act adopted the Commission's stance on GPA and test scores, permitting test scores to be used in lieu of high school GPA when either a) the student attended a high school in the United States or in a foreign country whose GPA calculation does not correspond to standard 4.0 format; or b) when the student graduated from high school more than 5 years prior to their application for aid. SB 1644 essentially codified the prior high school GPA definition:

Education Code section 69432.5

(h) "High school grade point average" means a grade point average calculated on a 4.0 scale, using all academic coursework, for the sophomore year, the summer following the sophomore year, the junior year, and the summer following the junior year, excluding physical education, reserve officer training corps (ROTC), and remedial courses, and computed pursuant to regulations of the commission. However, for high school graduates who apply after their senior year, "high school grade point average" includes senior year coursework.

The only real change in the SB 1644 definition is the exclusion of "remedial coursework." This change remains a cause for concern when evaluating the Cal Grant High School GPA. There is no such thing as "remedial coursework" in high schools, although some districts interpret this to mean any repeated course. This inconsistency means that some students may be treated unequally.

Education Code section 69432.9(c) further outlines the collection of and the intent of the Legislature:

(c) The commission shall require that a grade point average be submitted for all Cal Grant A and B applicants, except for those

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permitted to provide test scores in lieu of a grade point average. The commission shall require that each report of a grade point average include a certification, executed under penalty of perjury, by a school official, that the grade point average reported is accurately reported. The certification shall include a statement that is subject to review by the commission or its designee. The commission shall adopt regulations that establish a grace period for receipt of the grade point average and any appropriate corrections, and that set forth the circumstances under which a student may submit a specified test score designated by the commission, by regulation, in lieu of submitting a qualifying grade point average. It is the intent of the Legislature that high schools and institutions of higher education certify the grade point averages of their students in time to meet the application deadlines imposed by this chapter.”

It is important to note that the Cal Grant GPA is one of several that high schools calculate and/or maintain for their students. Unlike the University of California (UC) and the California State University (CSU) GPA that includes only “A - G<sup>1</sup>” coursework and includes additional points for AP/Honors courses, the Cal Grant GPA is calculated on a 4.0 scale, excludes ROTC, physical education, and remedial coursework, and includes class work from the sophomore year through the summer following the junior year.

**Current Process**

Education Code 69432.9(a) states:

“A Cal Grant applicant shall submit a complete official financial aid application pursuant to Section 69433 and applicable regulations adopted by the commission.”

Even though the Education Code places the responsibility of submitting a GPA on the student, the Commission encourages high schools to submit the Cal Grant high school GPAs for all graduating seniors as well as for graduates from the preceding year. If the student’s high school does not submit a verified GPA to the Commission on the student’s behalf, the student must complete a paper GPA verification form, have the GPA on the form verified by an appropriate high school official, and submit the verified form to the Commission. Both the FAFSA and GPA verifications must be submitted by March 2 to qualify the student for consideration of an Entitlement Cal Grant award in the following academic year.

**Submissions**

The total number of GPAs submitted by high schools and the percent of GPAs with a matching FAFSA has increased over the first three years of the Entitlement program (see Table 1).

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**Table 1: Submission of Cal Grant High School GPAs to the Commission**

	<i>Total High School GPAs Submitted</i>	
	#	%
2001-02		
All GPAs	178,384	
GPAs with matching FAFSA	77,622	43.5%
2002-03		
All GPAs	189,755	
GPAs with matching FAFSA	98,632	51.9%
2003-04		
All GPAs	201,338	
GPAs with matching FAFSA	99,959	49.6%

Note: These are GPAs submitted by High Schools with Using\_HS\_GPA\_Flag = 'Y' and excludes those GPAs submitted by colleges.

Does the statutory requirement of a verified high school GPA put a burden on graduating seniors and high schools? It is certainly one more thing to remember amid the flurry of senior year activities and college preparations. The loss of an Entitlement grant is a severe consequence for the student, but there are no consequences for a high school that chooses not to submit all graduating senior GPAs.

Is this an enormous problem? It is difficult to say. The FAFSA does not provide a clear indication of who is a high school senior and the Commission does not process for financial eligibility until after the FAFSA is matched to a GPA.

**POTENTIAL BARRIERS**

The Entitlement Cal Grant Program provides such an incredible opportunity for California's high school students that identifying and reaching potential applicants is of foremost importance. In asking for a GPA for all graduating seniors and prior year graduates, the Commission is well aware that encouraging high schools to submit Cal Grant GPAs on behalf of their students increases workload for high schools, colleges, and Commission staff as well as posing potential legal and procedural challenges for some high schools. The following section identifies and assesses some of the real and perceived barriers related to the collection of the required GPAs.

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**Survey of High School Counselors**

In the fall of 2003, the GAC Workgroup on High School GPA Issues designed a survey to gather information regarding the perceived barriers for high schools to submit Cal Grant GPAs for their students. The surveys were administered by Commission staff during the CSAC/EDFUND Fall High School Counselor workshops held all over California. The high school counselors were asked to list all of the GPAs their schools collect and/or calculate; and indicate if calculating and/or submitting a Cal Grant GPA was too labor intensive. Commission staff collected and entered 1,147 surveys onto a database. Once data capture was complete, there were 734 non-duplicate records.

**Terminology**

One of the first observations regarding the survey data is that there does not seem to be consistent terminology for the myriad of GPAs collected by schools. The list of the types of GPAs calculated was three pages long. It is safe to assume that some of the GPAs could be collapsed into the same categories, but the descriptions all varied by the academic years included, courses excluded, and the purpose of the GPA. This is not a barrier to the schools, per se, but it is a barrier to locating a common GPA that could be an alternative to the current Cal Grant GPA.

**WebGrants Connectivity**

There are 3,686 public and private high schools on the Commission's 2004-05 GPA database. Although 812 (or 39.4 percent) of the 2,061 accredited<sup>2</sup> or UC approved high schools are registered to use WebGrants, approximately 30 percent are actually uploading verified Cal Grant high school GPAs to the Commission.

High school counselors from 250 of the WebGrants schools also responded to the fall 2003 survey. Approximately 24 percent (sixty schools) felt that submitting GPAs was a significant workload issue, even though 45 of those schools used the web to upload files or key individual SSNs.

**High School Workload to Calculate GPAs**

One third of all schools surveyed consider the calculation of the Cal Grant GPA to be a significant workload issue. Listed below are some possible options for modification; however, modifying the current definition would require a statutory change.

*Remedial Coursework:* The law's exclusion of "remedial" classes is vague. The statute does not define "remedial," and there is no common understanding of the

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term as it is used among high school educators. Thus its interpretation may be creating confusion and disparity among applicants. It is not clear that “remedial” courses exist at the high school level, or that a remedial course has less educational value than non-academic courses that are included in the GPA calculation. Elimination of the exclusion of remedial classes or creating an understandable definition could provide a more consistent calculation and less confusion. One possible definition for remedial classes that could be easily interpreted and implemented is any grade that does not count towards graduation from the student’s high school.

*Academic GPA:* Converting the Cal Grant GPA to an “academic” GPA that excludes all non-academic courses could also be considered. One possibility would be to base the Cal Grant GPA on the courses used for admissions purposes at UC and CSU (i.e., the “A-G pattern courses”). Focusing on academic courses would be consistent with the agenda of Superintendent of the Department of Education to raise academic standards and encourage all high school students to take a more rigorous curriculum. However, it would be inconsistent with the mission of the Cal Grant program to assist students with all types – both academic and vocational -- of postsecondary options. An academic GPA might be inappropriate for students planning on attending a community college or vocational institution with the goal of attaining a degree in a non-academic field.

*AP/Honors Weights:* The original statute mandates the use of a 4.0 scale and does not allow for additional points for Advanced Placement (AP) and honors courses. Giving additional weight to AP/honors courses might encourage students to take a more challenging curriculum and would send a message that the State values high standards. The UC and CSU give extra points for AP or honors courses. While this would make the Cal Grant high school GPA correspond with the student’s computed GPA for admission at the UC and CSU, it does not necessarily meet the needs of all segments. Nor does it address the educational disparity that exists across the state for students who have few, if any, AP/Honors courses at their school. While it is true that the UC and the state are working to provide on-line AP courses at all schools, it is also true that on-line AP courses do not provide the same experience and learning environment as on-site courses and not all students are accessing them.

Using weighted scores would also introduce an additional level of complexity into the calculation, increasing the burden on school administrators and students, and increasing the odds of an error in the calculation. Although a weighted calculation is used for UC admission purposes, UC calculates the GPA based on self-reported transcript information, which is later verified by submission of actual transcript copies. The high school is not required to calculate the high school GPA. In fact, the survey of high school counselors conducted in Fall 2003, found that only 20% of all represented high schools maintain a UC GPA electronically on their records database.

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A shift to a weighted GPA would result in higher GPAs calculated for students who enrolled in AP or honors courses and hence can be expected to increase Cal Grant eligibility overall. The exact number of students who would be affected and the subset of those who would become newly eligible for a Cal Grant are unknown. Past analyses (see Attachment A) comparing weighted and unweighted GPAs suggest that the increase would be slight—less than 5%. Thus, although such a change would not disadvantage anyone, it would, nonetheless, result in increased costs.

*Universal GPA Calculation:* Two recent studies underscore the lack of consistent GPA definitions and calculations, making the idea of finding a universal GPA unlikely. Sixteen percent of the counselors surveyed in the Fall of 2003 indicated that a GPA to determine class rank, a potential universal GPA, was not calculated at their schools. Moreover, even when schools do calculate a “class rank” GPA, they do not all calculate it the same way.

### **Workload to Submit GPAs-- Inadequate Resources and Staffing**

Whether by paper or web, submitting GPAs to the Commission requires staff time. *The survey of high school counselors did not ask specific questions regarding staffing and resources. Anecdotally, it is apparent that high school counseling offices are understaffed and facing further cuts. The anecdotal evidence is reinforced by a National Center for Education Statistics (NCES) report that ranked California 51<sup>st</sup> for student to counselor ratios in 2000. The average ratio in California is now 934:1 compared to a national average of 477:1.*

### **Unavailability of Student Social Security Numbers (SSNs)**

The unavailability of student SSNs is a significant barrier to the submission of all graduating senior GPAs. The fall 2003 survey indicated that student SSNs are not routinely collected at over 34 percent of high schools. Since an SSN is not a requirement of enrollment, many schools collect this information on a voluntary basis only. Privacy concerns are the main reason given by the schools that do not collect SSNs. To help alleviate this problem, the Commission developed a release form for high schools to give to their seniors.

### **Privacy Concerns About Disclosure of Confidential Information**

Various privacy laws prohibit high schools from releasing confidential information (including SSN and GPA) to a third party (i.e., the Commission) unless the requirements of certain exceptions are met or unless the student has given permission for the disclosure. Although one of the exceptions allows for the release of confidential information for the purpose of awarding financial aid, it is less clear under what circumstances, if any, high schools can transmit GPA information when they do not know that a student has actually applied for a Cal Grant and they do not have the student’s permission to release such information. Thus some high schools

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are hesitant to include all students on the files they submit to the Commission and instead expect individual students to request that their GPA information be sent to the Commission.

It is clear that the Legislature intended for information to be shared with the Commission from Education Code Section 69433(5)(e):

*“The commission may enter into contracts with a public agency or a private entity to improve the processing and distribution of grants, fellowships, and loans through the use of electronic networks and unified data bases.”*

Table 2 illustrates some of the barriers reported on the fall 2003 survey. The schools were grouped according to the percentage of HS GPAs submitted. Schools submitting more than 75 percent of their seniors’ GPAs were much more likely to have access to WebGrants, maintain an electronic Cal Grant GPA and routinely collect SSNs.

**Table 2: Percent of High Schools Viewing Various Factors as a Significant Barrier to the Submission of Cal Grant GPAs to the Commission by the High School**

	<i>High Schools by % of all Senior GPAs Submitted</i>		
	<i>&lt; 25% (n=37)</i>	<i>25% - 75% (n=240)</i>	<i>&gt;75% (n=134)</i>
<i>Schools with WebGrants</i>	16.2%	36.3%	85.1%
<i>Schools maintaining an electronic Cal Grant GPA</i>	27.0%	41.7%	51.5%
<i>Schools routinely collecting SSNs</i>	37.8%	24.6%	68.7%
<i>Schools not collecting SSNs due to privacy concerns</i>	42.9 %	32.0%	25.0%

**GOALS OF THE GRANT ADVISORY COMMITTEE REVIEW**

Although not all individuals believe that providing a verified high school GPA for Cal Grant consideration is an undue burden on students, it is generally recognized that any extra requirement complicates an already opaque and burdensome financial aid application process and can interfere with maximum utilization of the program, especially among the low-income group of students whom the program is designed to serve. Thus it would be desirable to transfer the responsibility for submitting a verified high school GPA to the Commission from students to high schools, while improving the process to ease the workload for high schools.

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**Option 1: Shift Burden of Submitting GPAs from Students to High Schools**

The Commission could pursue legislation that would mandate all high schools to submit verified Cal Grant GPAs on behalf of all of their graduating seniors and recent graduates. This would remove the burden from the student and place it completely on high schools. As a mandate, this option would incur reimbursement costs to local schools that would be significant. In 2002, Legislative staff assigned a potential cost in excess of \$2 million to AB\_1059, a bill that initially proposed such a mandate. Largely because of the cost, the mandate was amended out of the bill.

**Option 2: Maintain Student Responsibility, but Increase High School Submission of GPAs**

The Commission wants high schools to electronically submit a verified Cal Grant GPA for 100 percent of their graduating seniors as well as the prior year graduates who are still eligible for the Cal Grant Entitlement Program. Having said that, the Commission recognizes that moving all high schools to 100% electronic submission of all high school senior and graduate GPAs in the short-run is unlikely without statutory change. The Commission also recognizes that barriers pertaining to student privacy must also be addressed.

- The Commission should, in conjunction with the California Department of Education (CDS), provide legal guidance to high schools on permissible ways to release SSNs to the Commission. This may be through the use of a third party agent, such as the National Student Clearinghouse or the California Department of Education.
- The Commission and CDS should continue to provide guidance to high schools on incorporating permission forms allowing high schools to disclose SSN and GPA information to the Commission. Appendix A shows the current SSN and GPA release form available for download from the Commission's website. CDS should prepare an Advisory and models for their website.
- The Commission should explore the development of an alternative algorithm to SSN for matching GPA records to FAFSA records. If such an algorithm could be established, high schools could submit GPAs without having to collect a SSN as long as they had the other required data elements.
- The Commission should continue to offer training and one-on-one technical assistance to high schools that are challenged by the electronic submission process.

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- The Commission should continue to educate superintendents and staff at the district level about the benefits to students when high schools submit Cal Grant GPAs on behalf of all seniors and recent graduates.
- The Commission should ask high schools to designate a Cal Grant GPA Administrator at their school. The administrator would be a point person to facilitate accurate GPA reporting and to assist in resolving technology and procedural issues.
- The Commission should explore the possibility of contracting with the Federal Processor to have a pop-up window appear for California residents reminding them to complete a GPA Verification form.

**Option 3: Eliminate Student Responsibility for Submitting a Verified GPA by Increasing High School GPA Submissions and Providing for a Secondary “Clean-up” Process**

This option would attempt to eliminate the current student responsibility for submitting a verified GPA in all but a few situations, e.g. military dependents outside of California or the United States. The option relies on increasing the submission of GPAs by high schools through the means outlined in Option 2. When these means have reduced the size of the pool of students who have submitted a FAFSA and are otherwise eligible for a Cal Grant except for an absent GPA to a small number, CSAC would implement a proposed secondary “clean-up” process. Under this process --

- the Commission would contact (through email when possible) all otherwise eligible applicants who submitted a FAFSA and met the financial and other (e.g., residency) eligibility criteria for a Cal Grant but did not have a verified GPA by the March 2<sup>nd</sup> deadline;
- The Commission’s communication would inform the students that their GPAs were missing and ask them to authorize CSAC to contact their high school to obtain their GPA. The student would need to provide the name of the high school they were attending and provide permission for the high school to release their GPA, high school graduation date, and any other information needed to establish their Cal Grant eligibility.
- After receiving the student’s consent, the Commission would be responsible for following up with the student’s high school to obtain the GPA and other needed information.

In order to consider this, several issues would need to be addressed.

- First, both the March 2<sup>nd</sup> deadline and the requirement that the student provide a verified Cal Grant GPA are statutory requirements. The

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Commission would need to pursue new legislation to affect these changes. There would be a cost to allowing GPA's to be submitted after the March 2<sup>nd</sup> deadline because more students would qualify for a Cal Grant. However, because the clean-up process would only be implemented when the pool of potential recipients with missing GPAs was small, the cost would be somewhat constrained.

- Second, the Commission would need to restructure and reprogram the current Grant Delivery System. The system does not establish eligibility until after a GPA and FAFSA have been matched. This option would require every electronic FAFSA record to be processed and then matched with a GPA. Changes of this magnitude would likely require a Request for Information (RFI), Request for Proposal (RFP), and Department of General Service approval.
- Third, the workload and resources associated with such an endeavor would be overwhelming and expensive.

**Option 4: Utilize a Transcript Evaluation Service**

The Commission could develop a new Cal Grant high school GPA collection process based on a transcript evaluation service. Such a service is currently under development as one of the outreach proposals approved by the Commission this past year.

The transcript evaluation service currently being developed is a tool to help high school students achieve UC and CSU academic eligibility as well as evaluate their progress toward completing a more basic "a-g" curriculum. The service includes software that would evaluate students' high school transcripts to provide guidance about achieving UC and/or CSU eligibility and to provide guidance about the likelihood of Cal Grant eligibility. High schools would utilize the service by transmitting their high school transcripts electronically to the third party administering the evaluation service. In addition to calculating a UC and CSU GPA for admissions purpose, the service is designed to calculate a high school Cal Grant GPA for the students who have started their senior year and forward the GPA to the Commission. This would allow high schools to transfer their responsibility for verifying Cal Grant GPAs to a third party.

This pilot transcript evaluation service will include 30 California public high schools in the first year, growing to 150 schools in year three. However, over 70% of public schools currently have the capacity to use this service. For participating schools it could serve as a new and cost-effective means for Call Grant GPA submission. The service also plans to create "Cal Grant Senior Action Reports" to flag those students who may be eligible for a Cal Grant so that field and school staff can work with these students on submitting a FAFSA on time. Pending evaluation of the pilot, CSAC could add this route as one of the ways high schools may submit GPAs.

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Achieving universal high school participation in such a transcript service will be a major challenge and is not anticipated in the near future. As such, the service is not an option that offers a complete solution to eliminating student responsibility for submission of Cal Grant GPAs.

**CONCLUSION**

There is no simple, short-term way to minimize the administrative impact of the GPA requirement in the Cal Grant program. Utilizing a single GPA that is calculated consistently across Cal Grant applicants remains necessary for equity reasons. From a policy perspective, the current Cal Grant GPA definition serves the mission of the program (although eliminating or better defining the remedial coursework exclusion could improve the consistency of the GPA calculation). Moreover, there is no universally calculated high school GPA that one could adopt to simplify the submission process. Regardless of how it is implemented, a Cal Grant GPA requirement that is based on a single, consistent calculation is inherently expensive.

Eliminating student responsibility for submission of the Cal Grant GPA would simplify the Cal Grant application process for students. By requiring just the submission of a FAFSA, the Cal Grant application process would no longer have an extra step that is not part of the process for applying for federal and institutional aid. The student responsibility could be eliminated if all high schools were to submit Cal Grant GPAs on behalf of their seniors and previous year seniors. However, a number of barriers – both workload and legal/policy -- exist to universal submission of Cal Grant GPAs by all high schools. Achieving this goal without all high schools submitting GPAs may be possible but would involve significant new costs.

A more modest goal would be just to increase the number of high schools that submit Cal Grant GPAs on behalf of their students. Although this will not eliminate student responsibility for the process, it would mean that fewer students would have missing GPAs and therefore possibly miss out on a Cal Grant because they do not fulfill their responsibility. Given that there are multiple reasons for high schools not submitting GPAs, even this more modest goal would require a multi-pronged approach.

**RECOMMENDATIONS**

**Cal Grant High School GPA Definition**

The Grant Advisory Committee recommends that the current definition of the high school Cal Grant GPA be retained with the exception of the exclusion of “remedial” courses. GAC recommends that CSAC clarify the definition of “remedial” courses through appropriate administrative processes to mean any course that does not

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count towards high school graduation. In addition, GAC recommends that CSAC pursue the possibility of amending the statute to eliminate any reference to remedial courses.

**Cal Grant High School GPA Submission Process**

The Grant Advisory Committee recommends that the Commission pursue the goal of eliminating student responsibility for submitting a Cal Grant high school GPA. To that end, GAC recommends that Commission staff pursue the options described above that would achieve this goal (i.e., Options 1 and 3).

It is recommended that Option 1 be pursued first since it would result in a simpler process. Also, the statutory mandate might address the legal barriers to SSN collection and to the disclosure of confidential information to CSAC for non-Cal Grant applicants.

If Option 1 proves unsuccessful, it is recommended that Option 3 be pursued. This would mean also implementing the steps listed in Option 2 that would work to increase the number of GPAs submitted by high schools. In addition, it would mean developing the feasibility of the “clean-up” process described in Option 3. Commission staff would need to lay out the additional costs (especially the costs of systems modifications) so that they could be weighed against other proposed program and systems enhancements. Staff would also need to determine how small the pool of potential Cal Grant recipients with missing GPAs would need to be before the volume driven costs associated with the “clean-up” process would be manageable.

Lastly, it is recommended that upon completion of the pilot of the transcript evaluation service described in Option 4, the Commission determine if the transcript evaluation service should be added as an alternative for high school submission of GPAs.

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<sup>1</sup> The purpose of the a-g subject area requirements are to ensure that entering students can participate fully in the first year program at the University in a broad variety of fields of study; have attained necessary preparation for courses, majors, and programs offered at the University; have attained a body of knowledge that will provide breadth and perspective to new, more advanced studies; and have attained essential critical thinking and study skills.

The following general criteria must be satisfied for courses to meet the requirement: be academically challenging; involve substantial reading and writing; include problems and laboratory work, as appropriate; show serious attention to analytical thinking as well as factual content; and develop students’ oral and listening skills.

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The Board of Admissions and Relations with Schools (BOARS) establishes the subject areas and pattern of courses required for minimum eligibility for freshman admission to the University of California. BOARS is a committee of the University's Academic Senate and includes faculty representatives from each campus of the University. The Academic Senate has been given the responsibility from the UC Regents to set the conditions for admission, subject to final approval of the Board of Regents.

*The California State University system has agreed to accept courses certified by the University of California to meet its subject area requirements.*

<sup>2</sup> A school must be accredited by WASC, file an application with the Commission, and complete required security forms in order to gain access to WebGrants.

**Assembly Bill No. 1241**

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Passed the Assembly September 7, 2005

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*Chief Clerk of the Assembly*

\_\_\_\_\_

Passed the Senate September 6, 2005

\_\_\_\_\_  
*Secretary of the Senate*

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This bill was received by the Governor this \_\_\_\_\_ day  
of \_\_\_\_\_, 2005, at \_\_\_\_\_ o'clock \_\_\_\_M.

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*Private Secretary of the Governor*

## CHAPTER \_\_\_\_\_

An act to add Section 69432.6 to the Education Code, relating to student financial aid.

## LEGISLATIVE COUNSEL'S DIGEST

AB 1241, Matthews. Student Aid Commission: reports from high schools.

Existing law requires that a grade point average be submitted for all Cal Grant A and B applicants, except for those permitted to provide test scores in lieu of a grade point average.

This bill would require the Student Aid Commission to make an annual report to the appropriate policy and fiscal committees of the Legislature and the Superintendent of Public Instruction including the number of grade point averages for pupils enrolled in grade 12 submitted by public and private high schools to the commission, the number of pupils enrolled in grade 12 in each of the high schools from which grade point averages were submitted in the academic year immediately prior to the report date, and the number of federal financial aid applications received from a prescribed group of pupils who are otherwise eligible to receive a Cal Grant award, as specified, but for whom no grade point average was submitted to the Student Aid Commission by their high schools.

The bill would express legislative intent and legislative findings and declarations relating to the processes relating to the transmission of pupil grade point averages and the submission of applications for financial aid.

The bill would require the Executive Director of the Student Aid Commission and the Superintendent of Public Instruction, or their designees, to jointly convene a working group of not more than 15 members. The bill would require the working group to consult with representatives of California public and private high schools, the segments of higher education, and pupil representatives to develop strategies for streamlining the process of reporting grade point averages for pupils. The bill would require the Executive Director of the Student Aid Commission and the Superintendent of Public Instruction to provide a joint

report to the Legislature by April 1, 2006, on the results of the consultation undertaken pursuant to the bill.

*The people of the State of California do enact as follows:*

SECTION 1. Section 69432.6 is added to the Education Code, to read:

69432.6. (a) The Student Aid Commission shall, on or before November 1 of each year, submit a report to the appropriate policy and fiscal committees of the Legislature and to the Superintendent of Public Instruction including all of the following:

(1) The number of grade point averages, submitted for pupils of each public and private high school to the Student Aid Commission, that were received on a timely basis for the March 2 deadline, and additionally received on a timely basis for the September 2 deadline, in the 12 months immediately prior to the report date.

(2) The number of pupils enrolled in grade 12 in each of the high schools from which grade point averages were submitted in the academic year immediately prior to the report date, using data from the California Basic Educational Data System (CBEDS).

(3) The number of federal financial aid applications received as of September 2 of the report year from pupils who indicate on the Free Application for Federal Student Aid that they are California residents, who provide a birth date that indicates they will be age 20 or younger on January 1 of the award year, who provide a grade-level response indicating they have never attended college and will be first-year undergraduates in the award year, who meet the income and asset ceilings for a Cal Grant award, and for whom no grade point average information was submitted to the Student Aid Commission by their high schools.

(b) It is the intent of the Legislature that both of the following should occur:

(1) The State Department of Education, under the supervision of the Superintendent of Public Instruction, should provide technical assistance, as needed, using existing resources, to high schools regarding their transmittal of pupil grade point average

information to the Student Aid Commission through local school districts and county offices of education.

(2) All school districts should release grade point average information to agencies or organizations in connection with the application of a pupil for financial aid under paragraph (2) of subdivision (b) of Section 49076 of the Education Code.

(c) (1) The Legislature finds and declares both of the following:

(A) Otherwise eligible Cal Grant applicants in California, who fulfill their obligation to submit a financial aid application in a timely manner, are not receiving the Cal Grant benefits to which they are entitled solely because they are unaware of their additional obligation to submit a certified grade point average by the specified deadline.

(B) The Student Aid Commission is provided authority in subdivision (c) of Section 69432.9 to establish a grace period for receipt of this certified grade point average.

(2) It is the intent of the Legislature that the Student Aid Commission use the authority provided in subdivision (c) of Section 69432.9 to notify pupils who are otherwise eligible for the Cal Grant A Entitlement Program, the Cal Grant B Entitlement Program, and the California Community College Transfer Cal Grant Entitlement Program of their obligation to submit a certified grade point average and to provide these pupils with an appropriate grace period in which to do so.

SEC. 2. (a) The Executive Director of the Student Aid Commission and the Superintendent of Public Instruction, or their designees, shall jointly convene a working group of not more than 15 members, which shall consist of parties who are interested in the process of reporting high school grade point averages. The working group shall include representation from the Student Aid Commission and the office of the Superintendent of Public Instruction, and shall consult with representatives of California public and private high schools, the segments of higher education, and pupil representatives to develop strategies for streamlining the process of reporting grade point averages for pupils, while also maximizing the number of pupils for whom grade point averages will be certified and submitted by March 2 for pupils enrolled in grade 12, and by September 2 and the

subsequent March 2 for pupils who were enrolled in grade 12 in the immediately preceding year.

(b) The Executive Director of the Student Aid Commission and the Superintendent of Public Instruction shall provide a joint report to the Legislature by April 1, 2006, on the results of the consultation undertaken pursuant to this section. This report shall include all recommendations made to maximize the submission of grade point averages. The report shall also include information about issues related to grade point average definition, privacy, unique identifiers, methods of submission, training and support for high school personnel, and the costs involved in this process.

Approved \_\_\_\_\_, 2005

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*Governor*

**2005 CA A 1241 : Governor's Message - 10/04/2005**

BILL NUMBER: California Assembly Bill Number 1241 VETO DATE: October 4, 2005

To the Members of the California State Assembly:

I am returning Assembly Bill 1241 without my signature.

Specific legislative authority is not necessary for the California Student Aid Commission (CSAC) to convene a working group to develop strategies to facilitate the submission of student grade point average verification to CSAC. In fact, CSAC has already convened a working group to study the barriers to the grade point average submission process. Therefore, this bill is unnecessary.

For these reasons ....

Sincerely,

Arnold Schwarzenegger