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February 20, 2019

Charles Puls
Deputy Assistant Commissioner
Texas Higher Education Coordinating Board
1200 E. Anderson Lane
Austin, Texas 78752

Dear Mr. Puls:

In relation to SB 34 relating to the maximum number of semester credit hours allowed for and funding sources used to supplement a TEXAS Grant, TASFAA would like to provide context to continuing to allow the 150 hours maximum number of semester credit hours for the TEXAS Grant Program.

Limiting TEXAS Grant eligibility to 135 semester credit hours or 15 semester credit hours in addition to number of credit hours needed to complete the student's degree program would affect low-income students. In addition this would directly impact retention and graduation efforts as well as student loan debt which are key components in the state's 60 X 30 strategic plan for higher education.

The lowering of the criterion to 135 hours only allows a student to receive the grant for one additional semester above the typical 120 required to earn a baccalaureate. However, this more limiting criterion would harm financially needy students who may change their major (which is not uncommon for all students, regardless of need) or who face challenges to degree-completion that are unique to first-generation and underrepresented student populations. It is important to keep in mind that it is these at-risk populations who are predominantly served by the TEXAS Grant program.

In addition, such a change in criterion further exacerbates the misalignment of the program's Satisfactory Academic Progress (SAP) criteria of most federal aid programs. Alignment between both state and federal financial aid programs SAP requirements is critical to ensuring access to these programs(with aligned and, thus, easy to understand renewal criteria) for financially-needy students and the meeting of the state's 60 X 30 strategic plan for higher education. Students who would lose TEXAS Grant under this bill proposal would continue to be eligible for Pell under most SAP policies.

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