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General Questions

1. Not necessarily a question but I feel that it is important to note that we have not been given a reasonable time frame to complete the proposals for the 2019-2024 RFP. Based on the time frame provided, we are given more time to pose questions about the RFP than we are to complete our proposal after our questions have been answered. (it makes the Q&A seem unproductive because even if our questions are addressed and clarification is given, adequate time to respond is not provided). I would like to request that we are all given an extra week to complete our proposals (Postmarked April 26th) so we can incorporate the feedback from the Q&A period in a more reasonable amount of time.

We apprecia e he commen ers inp and ha e pda ed he d e da e o as postmarked.

2.	Due date for the report is April 19 which is Good Friday and two days after the Tri-State

<u>HEOPRFP@nysed.gov</u> with a justification for withdrawal. While there are no specific penalties for future grant applications, a pattern of such actions could raise issues concerning responsibility of the applicant.

5. When will applicants receive notification of the grant decision?

Award notifications will be sent as soon as the application review is completed. These are expected to be sent at the end of May or the beginning of June 2019.

6. When will SED notify institutions that their 2019-24 RFP was accepted and contracted? Is there a timeline?

Award notifications will be sent as soon as the application review is completed. These are expected to be sent at the end of May or the beginning of June 2019.

7. Confirming an earlier directive, should the proposal be mailed by regular postal mail and not use any medium that requires a signature at the time of delivery?

SED recommends tracking. Signature confirmation is not required, but the IHE can decide on shipping options like signature confirmation. Note the new postmarked date of 4/26/2019.

8. Will SED send notification to each participating institution that their proposal was received and is under review?

No.

Formatting

9. Are attachments allowed?

Yes. As outlined in the RFP; see question 14, too.

10. Is there a reason that the font size and spacing were changed from the 14-19 RFP? (i.e. 12pt font, Calibri, double spaced VS 11pt font, Calibri, 1.5 spacing) - This effectively gives projects less space to complete the same amount of content.

While e apprecia e he commen ers inp no changes ha e been made Using a 12-point font allows better readability of the proposal.

such documents be considered this?

The quoted language on p. 44 of the RFP refers to items that are not specifically required in the RFP. Job/title descriptions are listed as a required attachment on p. 46 of the RFP. Brochures are not. See answer to Question 19.

18. Can all organizational charts be attached as appendices? In reference to p. 46 Part 5b. Yes.

19. If a brochure or university-formatted position description are approved attachments,

-

documents have their own formatting. Must they be reformatted for inclusion in the appendix?

These types of attachments will not have to be reformatted. As noted in question 17, position descriptions are required attachments. Brochures are not. Therefore, if a brochure

multiplied by \$7,000 for IHEs outside of New York City and multiplied by \$7,500 for IHEs within New York City.

An IHE can ask up to \$7,000 per FTE and up to \$7,500 per FTE for NY City, however it can be lower based upon the IHE s cost calculations per student.

- 27. Is there a minimum number of HEOP students to be served annually in the program?

 Current programs have 32 or more student FTEs in HEOP. Therefore, SED recommends having a minimum of 30 FTEs annually in any program except for start-up programs; these may start with less than 30 FTEs in the first year, but SED recommends at least 10 FTEs a critical mass is needed to ensure program s s ccess.
- 28. Is there a requirement to involve a specific number of NYSEd programs in the HEOP program?

 I.e. if we currently have a CSTEP or STEP would we have to include a specific number of these students as HEOP students?

No, there is no requirement to include a specific number of students in other opportunity programs at the IHE as HEOP students. However, "double-counting" of students for reimbursement for the same activity from more than one program will not be permitted.

Prequalification Requirement

33. Should the notice of intent come from a specific administrator of the institution (e.g.,

President's office)? Or may it be sent by any administrator with the authority to do so? (pg. 2)

The notice of intent email may be sent by any authorized representative of the applicant IHE.

Description of Program

34. Is there a responsibility to provide support to off-campus residents and commuters? pg. 6 (On-campus meals, living stipend, etc.)

Yes. All students need to be full-needs packaged. Please also see the Equity and Non-Discrimination Policy on p. 17 of the RFP and the Supplemental Financial Assistance section on p. 26 of the RFP.

35. On page 11, it states that HEOP funds may be used for salary increases. Does this mean that we could give our HEOP staff increases using grant funds even if the rest of the institution did

not receive increases?

The intent of this paragraph is to ensure that HEOP staff receive an equitable salary (including pay increases) with equivalent staff titles at the institution.

36. Page 8-9. Part-time student in a full-time program: Are seniors allowed to be on the roster if they are part-time during their last semester? The description is a bit confusing. The description initially mentioned students with extenuating circumstances being eligible. And if that is the case, who is the funding source? NYSED or Institution?

Yes, seniors are allowed to be on the roster if they are part-time during their last semester. The funding source does not change. The funding source may come the HEOP grant and/or the institution. HEOP students, whether part-time or full-time, must be fully packaged.

37. Page 9. Special

special academic session which the student needs to take to make academic progress in their studies. SED will inform the IHE what documentation is required.

38. On page 9 under "Special Sessions", item 1 specifies that if a director and financial aid officer verify a student's legitimate reason to attend a special session, they must document this. What constitutes a legitimate reason and what type of documentation is required? Are there any legitimate reasons that would justify the use of HEOP funds; if so, what is the process to seek SED approval?

See answer to Question 37. The process for approval is to email your SED liaison and provide the rationale for the request. SED will inform the IHE what documentation is required.

39. What's the success rate of start-up program application vs. a renewal program application for the last grant cycle?

The success rate of new applicants for the 2014-19 RFP cycle was 100%, which is higher than the programs that submitted renewal applications.

Student Eligibility

40.

limited to the following #8 Attendance in a High-Needs High School Can we go outside of this list? If not, this does not work for universities that have higher academic criteria.

Yes. This list of criteria on pp. 12-13 of the RFP is not all-encompassing. Furthermore, all students need not have attended high school in one of the high-need districts listed at the link in #8. The IHE must strive to reach the most educationally disadvantaged students that are able to succeed at that institution.

41. Page 13. High Need HS Is it correct to interpret that all NYChigh schools are considered High Needs High Schools as detailed in the chart?

Yes. See: http://www.p12.nysed.gov/irs/accountability/2011-

12/ NeedResourceCapacityIndex.pdf.

42. Page 13 Item #2

Yes, as long as the boarding school issued the student a diploma recognized by the state in which it is located.

45. Page 13 14 Earned post-secondary credit bearing certificate or degree and college courses while in high school: Item # 2; Students must not have more than 15 college credits m8

Question: What happens to students who have 4 credit bearing courses? Can an allowance be given in form of a range of 15 18 credits?

The question is unclear. As stated in answer to question 43, a student is ineligible for HEOP if, while in high school, he or she earned more than 15 college credits that would ordinarily be transferable to your institution.

46. What about students who initially do not disclose credits earned at a higher education institution and is not reflected on their high school transcript?

The student is expected to be truthful in their application to the best of their know(on)4()-Qq59dl:9()-57s dFF1 11 Tf1

47. On page 14, item 2 under "Post-secondary credit-bearing certificate or degree and college

51. RE: Transfer students- Are we allowed to consider students from the CUNY ASAP program or Guttman Community College eligible for HEOP consideration? Those students share many of the eligibility markers of HEOP students.

Only students transferring from opportunity programs funded under Section 6451 or 6452 (Higher Education Opportunity Program, Educational Opportunity Program, Search for Education, Elevation, and Knowledge, College Discovery) of the New York State Education Law are eligible to transfer into HEOP.

- 52. Page 16. Under the section Economic Disadvantage, the acceptable documentation section social security supplemental Income. Is that considered SSI benefits?

 Yes.
- 53. Is it permissible to offer a prospective first-time student a place on a wait list, and if a spot in the HEOP incoming cohort opens BEFORE the beginning of the summer program she or he may be offered admission, and if not is denied admission? This is standard Admissions practice. I

see no mention of wait lists except in the context of transfers being admitted to the institution and being placed on a wait list for a program spot, which of course is not allowed.

Yes, but only for initial admission for first-time HEOP students in the first year. This does not apply to transfer students.

54.

including admissions policy, housing arrangements, classroom facilities, and allocation of udents to live in

The HEOP students must be treated the same as the general admit students. IHE shall not discriminate against HEOP students.

Scholarships for Academic Excellence

55. Is the NYS scholarships for Academic Excellence the same thing as Regents scholarships for academic excellence (Listed on pg 12. Under D. Bigibility)? If yes, does NYS inform a student that if they accept the NYS Scholarship for Academic Excellence they are not eligible for HEOP?

Answer to questions 55-58: Yes, the NYS Scholarships for Academic Excellence are the same thing as the Regents scholarships for academic excellence — he Scholarship —. Pursuant to 8 CRR-NY 27-1.1(a), recipients of the Scholarship are not eligible for admission into HEOP. However, if the IHE made the eligibility determination and admitted the student to HEOP before the student received the Scholarship, the student may remain in tha IHE s HEOP program. The IHE must keep documentation on file to prove the s—den s non-admissibility, by the college's normal admissions standards, in the degree program for which application is made.

56. Since recipients of Regents scholarships for academic excellence are notified of receiving the scholarship well after they are admitted to our institutions (typically over the summer), how are we expected to deny their initial eligibility for HEOP? It is my understanding that the process for nominating students for the scholarship is driven first by their high school counselors, followed by an application submitted by the student and then a fairly late notification to respective financial aid offices. These students are indeed the most

disadvantaged students admitted to the University based on our selective admissions criteria.

Again, how are we to know which students ultimately receive the scholarship?

See response to question 55.

57.

Since this information may not be available during the admission cycle, please provide some guidance on expectations from the institution in implementing this requirement.

See response to question 55.

-2018 Program Year, the Commission promulgated changes to the Rules and
Regulations 27-1 and 152-1 that were approved by the Board of Regents to reflect the changes
-1 (8 CRR-NY17-1.1) for student

See the answer to question 60.

only admitting for summer program would put our students at a disadvantage compared to our general admissions students. May we continue to admit to HEOP across all semesters?

This is not possible; all first-year HEOP students must attend a summer program prior to matriculation & enrollment. You could, however, accept eligible transfer students.

67. The HEOP RFP

grant proposals who present stronger recruitment plans from the local community will be graded higher. Please confirm the intent behind this language. Should we be following the

asking how many students we are looking to admit in each year of the cycle (i.e. we are looking to support 18-19 new students in each year of the program)

The Associate Director of Undergraduate Admissions could only sign the form if the Chief Administrator signs the designee letter identifying this designee.

Full Need Packaging

72. Is it required to provide room & board for resident HEOP students? If so, is an institution required to provide and fund meals for commuter HEOP students?

Yes based on each siden in signancial need. The IHE is required in omee HEOPs denis fill financial need to cover the cost of attendance, including realistic subsistence costs. This includes room and board for resident students, as needed, and meals for commuter students, as needed.

73. Section E Asking for clarity: The section states that first-time HEOP students attending the HEOP summer program cannot be charged for their attendance. If programs offer courses for credit, it is permissible to charge tuition for those courses, but the grant or institutional funds (or other funds) need to be used to cover the costs?

Yes.

74. Are loans borrowed to cover residential housing costs a part of the cumulative loan burden rule?

Yes.

75. We have campuses in Westchester county as well as in NYC, so is the price per student different for the students who attend the Westchester county campus vs. the student who attends the NYC campus?

The students should be assigned to the campus where they take the preponderance of their coursework and the budget must be weighted appropriately/accordingly. For example, if the proposed program is for 50 FTEs in NYC and 50 FTEs outside NYC, the maximum allowable budget would be \$7,500x50 + \$7,000x50 = \$725,000.

76. Definitions of Frequently Used Terms, Full Need Packaging, passage on p. 5:

fully meet the needs of a student attending a HEOP institution (including room and board as needed); must be maintained for the duration of HEOP eligibility - even if the student loses

time HEOP student is packaged with loans the student may not be packaged with more than \$5,000 per year for r

undergraduate career? If there is an annual loan limit, is there an annual loan limit for all students beginning with the 2019-2024 RFP cycle, or does the annual loan limit apply only if students are packaged with loans as a first-time HEOP student?

The IHEs are held to annual loans limits for the first-time HEOP students, with no more than \$5,000 per year for residential students and \$4,000 per year for commuter students, AND to he TOTAL loan limit for held a number of the students are career as follons.

Outside NYC: the maximum cumulative loan limit for a resident HEOP student to complete a

bacc

additional loan or when they are near the threshold of accumulative loan limit? If approval is needed every time the student takes out the additional loan, it will be difficult for a school with 575 FTE

No, SED does no need o appro e loans aken o co er he EFC e pec ed famil con rib ion and hese loans do no co n agains loan limits. An loan amo n so er EFC count against loan limits. Schools must keep documentation on file.

80. Prorating Loans and Exception

need to take loans to cover no more than the expected family contribution (EFC). In the rare case of unusual and extraordinary circumstances where it is necessary for students to take out loans above the mandatory loan limits, IHEs must submit a written request to NYSED with documentation justifying packaging additional loans. This justification must be submitted and approved by NYSED before packaging a student with loans that exceed the loan limits. IHEs

an exception is being made for a student to borrow loans to cover the EC, does this require

approval from NYSED or is approval only required when this action would cause the loan limit to exceed the total maximum limit? Is approval required if it exceeds the annual limit?

No, SED does not need to approve loans taken to cover the EFC, and these loans do not count against loan limits. Any loan amounts over EFC count against loan limits. Schools must keep documentation on file.

81.

other NYSopportunity programs (SEEK/CD/EOP), the IHE should assess the amount of loans the student has taken while in another opportunity program and package the student with no more than \$5,000 for residential students and \$4,000 for commuter students for each year the r students limited to

\$5000/year residential and \$4000/year commuter even if the assessment of the prior loan history indicates that the student will not exceed the maximum loan limit at the time of graduation?

Yes.

82. a. In the case where transfer students have accrued previous loans that could put them over the total loan limit of \$25,000/\$20,000 (for example, students coming from EOP), can IHEs still package these students at the annual rate of \$5000/year residential and \$4000/year commuter?

Yes.

b. If so, does this need to be pre-approved by NYSED?

No.

c. When reporting loan totals for transfer students, do we exclude loans accrued while the student was in an EOP program?

Yes. Previous loans do not count towards the loan limit.

83. Page 20 Prorating States that the maximum grant for transfer students is \$5,000 per year. However, some institutions that use staggered loan calculations (ex., freshmen \$2,000, soph.

dedicate time to HEOP students if awarded? That counselor will have new tasks to that IHE counseling HEOP students, therefore in this narrow case (start-

starting on page 54 and on page 78 and will be scored based on the general qualities in the rubric on page 79.

- 87. Academic Support Services Page 24 Code to be used to pay peer tutors that are not HEOP students. Please clarify which code in the Budget FS-10 is to be used to pay for this expenditure. Are they considered Educational Assistants?
 - Please use Code 15 for any peer tutors or other tutors who are not HEOP work-study students (not the same as federal work-study). Use code 16 for HEOP work-study students.
- 88. Does the budget that we are approved for cover summer program cost or is there a separate RFP process for summer program expenses, similar to EOPs process?
 - There is not a separate RFP process for summer program. All required program elements, including the summer program, need to be included in the FS-10 and the composite budget.
- 89. In the previous RFP we completed the composite budget in the HEOPB-1 form. Is there a specific format in which we should submit this information this time around? If so, where can it be found?

In the Composite Budget form. http://www.highered.nysed.gov/kiap/colldev/heop/2019-

95. Please darify page 25, Remedial, Developmental, Compensatory and Summer Courses

Sections 3 & 4. The and/or clauses make it confusing. If credit is earned for the course, does this still apply?

The point of these provisions is that the composite HEOP budget taking into account both state funds and institutional funds may not include both the salary of the instructor AND tuition for the same course.

96. On page 25, in the section covering "Remedial, Developmental, Compensatory, and Summer Courses," could you please explain points 3 & 4 further? In particular, it seems that point 3 is a mistake and point 4 is the intended statement.

Both statements are correct. The point is that it would be double-counting to charge both the salary of the instructor AND tuition for the same course against the HEOP budget.

97. How is outside aid (not federal/state) calculated/affected for a HEOP aid receiving student?

IHE must make sure that the student is packaged to full-need. The inclusion of outside funds is a he IHE s discretion

I can be fo nd nder O her So rces in the Composite Budget form on the Summary tab at http://www.highered.nysed.gov/kiap/colldev/heop/2019-2024heopcompositebudget.xlsx.

Institution Name				
HEOP Award	Institution	Other Sources		

HEOP Office Organization and Administration

102. Description of Program, HEOP Office Organization and Administration, passage on p. 11

administrator is one who directly reports to either the institution's President, chief academic officer, and/or governing board. The institutions are strongly encouraged to have the HEOP director report to a Chief Academic Officer (e.g. provost or Vice President of Academic

u clarify if the HEOP director MUST report to a senior level administrator (VP or higher) or if they are STRONGLY ENCOURAGED to report to the Chief Academic Officer (VP or better)?

HEOP Director must report to someone who directly reports to either the institution's President, chief academic officer, and/or governing board at the time of application. That said, it is strongly encouraged to have the HEOP director report directly to a Chief Academic Officer.

105. Will a program be penalized if the HEOP director does not report directly to a VP or have a direct connection to Academic Affairs (Provost) but a clear rationale for the reporting structure/division is made?

HEOP Direc or m s repor direc I o a Senior le el Adminis ra or As per he RFP A senior level administrator is one who directly reports to either the institution's President, chief academic officer, and/or governing board."

- 106. In reference to the requirement that the HEOP Director report to a Senior Administrator, would a dual reporting line to both Academic and Student Affairs be approvable? More specifically; the HEOP Director will report directly to AVP of Student Success (who does not report directly to a Senior Level Administrator) with a dual reporting line to the Executive Director of Academic Policies, Operations & Services (who reports directly to the President). Would this reporting structure be approved per RFP guidelines?

 Yes.
- 107. I work at a large institution and report to an Assistant Vice President. This was allowed in the previous RFP. For this RFP, is it required or strongly encouraged? Will my application lose points if I report to an AVP? If it is required, does my reporting to Provost/VP need to be established at the time of the application or can it be later?

It is required for the HEOP Director to report to a senior-level administrator and to submit a signed Acknowledgement Form affirming that this requirement is met. Your example would only meet the requirement if that AVP is AVP of Academic Affairs and meets the definition

e denied if this reporting

structure is not put in place?

Your proposal must include a signed acknowledgement form affirming that this requirement is met. If, based on the totality of your proposal, the reviewers determine that the reporting requirement is unclear or discrepancies exist, you will not be disqualified solely on this basis. However, your proposal will be penalized by a deduction of points for this section.

Moreover, if the applicant is successful and is awarded a contract, the IHE will be expected to restructure the reporting to meet this provision, as directed by SED, within a reasonable time after the preliminary award notice is made and before a contract can be issued.

Monitoring

110. Page 30. Probation for HEOP institutions, the criteria for Graduation Rates; Which rates, 4 year or 6 year for the 4-year degree?

SED will monitor the 4-year and 5-year graduation rates. As per the RFP, a HEOP student is allowed ten semesters or equivalent of opportunity program eligibility.

111.

challenges that could inhibit their ability to persist. Could there be further criteria for this standard? For example, only count students toward this threshold who did not persist due to academic difficulties, rather than emotional, financial, family or health reasons. It seems unreasonable to punish programs for things we cannot control, whereas academic success is something we are actively charged with working with students on.

Student retention is a critical measure of program effectiveness. Therefore, there are no criteria that would exempt students from being counted; all HEOP students must be counted in this calculation. As stated on p. 13 of the RFP he IHE s admissions process m s be designed to assess the likelihood that students can persist and succeed. Consistent with the purpose of HEOP, the IHE must work with students to help them overcome not only academic stresses, but also financial stresses, such as losing TAP eligibility. As per page 30 in the RFP, a one-year variance would not result in the IHE being put on probation; Retention and or Grad a ion Ra es for HEOP's den s o Id ha e o be less han of he IHE's o erall s den s ra es for o consect it et also

116. Can you please clarify the explanation presented on page 8 of the RFP regarding

117. Can you please define retention? Typically, colleges define retention as persistence rate from the first year to second yea

listed in the definition glossary in the RFP?

As per USDOE at https://fafsa.ed.gov/help/fotw91n.htm Retention rate is the percentage of a school's first-time, first-year undergraduate students who continue at that school the next year. For example, a student who studies full-time in the fall semester and keeps on studying in the program in the next fall semester is counted in this rate." This would be calculated the same for sophomores continuing to junior year and for juniors continuing to senior year.

118. Page 31 Item #3 Phase out due to unsuccessful reapplication
that are unsuccessful in their reapplication in the next round of 2024-2029 funding cycle will

-

Institutions that are awarded funding for 2019-2024 under this RFP, and which are unsuccessful in their reapplication for the 2024-2029 cycle, will be phased out at that point,

consistent with the terms of this RFP. Any currently-funded institution that is unsuccessful in its reapplication under this RFP will be phased out in a similar manner.

Requirements

Prequalification for Individual Applications

119. If an institution has a NYS Grants Document Vault that is up-to-date with all forms, is it still necessary to go through the Pre-Qualification Process in the Grants Gateway?

Yo rinsi ionssa sm s be preq alified on he GransGae a a he ime of application.

Minority and Women-Owned Business Enterprise (M/WBE) Participation Goals

120. Would you please provide examples o

their HEOP programs?

M/WBE is not required in the current HEOP RFP. However, NYSED strongly encourages applicants to seek New York State certified M/WBE subcontractors or suppliers to the extent possible for expenditure items in their budget submissions.

Vendor Responsibilities

121. More darity on how to determine if a school is a vendor? What are the criteria needed to make the determination? Current description very convoluted.

For this RFP, all applicants are vendors. Anyone receiving a contract with NYS is considered a vendor.

122. Where can we find our NYS Vendor ID?

Any school that has a contract with NYS has a vendor ID. You may be able to find your vendor ID on the following systems: Grants Management; SEDREF; Statewide Financial
System; or OSC Vend Rep

the subtotal number of students served for the first four years (ramping up). Year five FTE is the same as year four FTE. Add year five FTE to the subtotal from the previous calculation to ge he To al N mber of S den s Ser ed o er he c de

126. Page 48 Population

support eac , does this mean new entering

students for years 1-5, or does this include returning students total enrollment for the 5-year cycle?

This means the total FTE served in each of the 5 years. For current programs, this number will typically be relatively steady across the 5-year cycle. For Start-Up programs, this number will increase each year up until year 4, as new students enter. The FTE for start-ups will remain steady during years 4 and 5.

127. Page 42 in reference to the Payee Information Form please define who is required to complete this form.

Your institution would only need to complete this form if it does not yet have a NYS vendor ID or if you need to change information on this form.

131. Do we have to use the forms provided for the Verification of Economic Bigibility, Educational we use our own version

we use currently?

These are samples. An IHE can decide to use these or their own forms.

132. How many pages are required for Section E(p.47)?

You can go up to 5 (five) pages max, with 2 (two) pages as the maximum per each goal. (E.g.

133. Section B

referring to the proposal or the program?

The proposal describes your program, ergo the proposal must describe program sip in rpose scope and outcomes.

134. Section C

and student outcomes in the last HEOP cycle or for similar opportunity programs (e.g., C/STEP, TRIO, or similar campus-based progr

- If o r IHE is c rren I an HEOP gran recipien o II ha e o describe o r compliance i h
 HEOP reporting requirements and student outcomes in the last HEOP cycle.
- If o r IHE is NOT a c rren HEOP gran recipien o II have to describe your compliance with the reporting requirements and student outcomes for similar opportunity programs (e.g., C/STEP, TRIO, or similar campus-based programs s ppor ed b he IHE
- 135. Please darify the expectations for sections for the Needs (D) and the Recruitment and Admission (G) sections.

different from Section G1B on p. 48, which asks for a description of the specific characteristics of the pool of potential HEOP-eligible students?

To avoid repetition in these two sections of your proposal, it is recommended that you describe the target population in one section and, if necessary, cross-reference that description in the other section. The difference should be in the focus of the narrative. We

communities to be served, while we expect section G to provide an in-depth summary of the IHE's specific plans and processes o recri and admi eligible applicans

Proposal Rubric

- 136. On page 69, are we looking for the program/services on campus for all underrepresented populations on campus? (HEOP and traditionally admitted) Section 1.c.

 Yes.
- 137. Which format should we follow when responding to the RFP: the narrative outline presented in the RFP, or the grading rubric provided at the end? As currently presented, they do not align. For example, the tutoring format presented in the narrative on pages 52 53 compared to the rubric for that section on page 73.

The narrative description and the rubric should correspond for each section. The narrative outlines the general guidelines used for programmatic purposes, while the rubric details the scoring process. Follow the rubric for scoring purposes.

136. Page 76 Rubric for Extra Oredit Section: Maximum Loan Limits Proposal describes how the program will provide financial aid packages that keeps the annual loans less than the

in he firs ear b no less han FTEs A cri ical mass is needed o ens re program s success.

138. If we plan to enroll fewer than 20 HEOP eligible students, please confirm 2.