

NASHVILLE
NEW SKILLS READY



Policy and Program Scan

A review of local, state, and federal policies
and programs that create
direct and indirect barriers to
higher education success for students

April 2022

Authored by the TN College
Access and Success Network

Funded by JPMorgan Chase's
New Skills at Work initiative



Acknowledgements

We are deeply grateful to the many cross-sector stakeholders who contributed their time and expertise to this project. This scan would not have been possible without their courage and candor. To protect all contributors, the identity of the individuals interviewed and their organizations will remain unidentified.

We are also grateful to JPMorgan Chase's New Skills Ready Network for creating the opportunity for us to conduct this deep dive into the policies and programs that create direct and indirect barriers for our students. It is our hope this document will be used to advocate for the removal of these barriers and create a more equitable Nashville.

About the Author

The Tennessee College Access and Success Network (TCASN) is a nationally recognized, statewide nonprofit organization whose mission is to advance efforts to improve college success for Tennessee students through research, facilitation, best practices, and expertise. TCASN's team has decades of collective expertise that span state government, federal college access programs, urban and rural initiatives, curriculum design, and the nonprofit sector. Learn more at www.tncollegeaccess.org.

Legend



Federal Policy/Program



TN State Policy/Program



Nashville Policy/Program



**Policy/Program that exists at the
Federal and State Levels**



**Policy/Program that exists at the
State and Local Levels**

FEDERAL POLICY/PROGRAM	INEQUITY CREATED	POSSIBLE SOLUTION	NOTABLE QUOTE FROM STAKEHOLDER
<p>Stagnant Purchasing Power of the Pell Grant</p>	<p>“At its historic high, the Pell Grant covered nearly 80% of the cost to pursue a bachelor’s degree at a public institution.” For the 2021-2022 academic year, that figure is only 29%.</p> <p>While not limited to black and brown students, the rising cost of college coupled with the stagnant purchasing power of the PELL prevents low-income students (many who are students of color) from participating in higher education.</p>	<p>Advocate for Congress to “Double the Pell” amount from the 2021-22 maximum award of \$6,495.</p> <p>Advocate for the lifetime limit on the Pell Grant to return to 18 semesters, allowing low-income students who attend higher education part-time more semesters to complete their degree/certification.</p>	
<p>Federal Aid Programs, such as Pell Grants, Limited to U.S. Citizens</p>	<p>Undocumented students are unable to receive federal aid to help off set the cost of higher education.</p>	<p>Advocate for Pell Grant eligibility to be extended to students who are undocumented.</p>	
<p>Lack of Student Transparency Regarding Satisfactory Academic Progress (SAP)</p>	<p>College students can lose their federal aid due to not meeting Satisfactory Academic Progress. Often students are unaware they are on a path to lose this aid until it is too late to improve their academic progress.</p>	<p>Advocate for higher education institutions to be required to provide early academic warnings to students before they lose access to federal financial aid due to not meeting SAP requirements.</p>	

Inability to Register for College Classes with a Past Due Balance

Students with past due balances at an institution are unable to register for classes. Students often drop out of classes due to challenges and barriers unrelated to their coursework and are left with balances that prevent them from continuing their education at any college. Currently, TN public institutions do not have the ability to forgive student balances for a student to return.

Allow students to register for classes with a past due balance so long as they sign an agreement saying they will pay the balance off by the time they graduate. By doing so, students will be able to access federal aid to cover college costs.

“If you owe money, you can’t come back to school. As little as \$200 can keep someone from coming back.”

Consider state legislation around debt forgiveness that would allow TN public institutions to forgive small balances so long as the student enrolls and makes progress toward completion. Forgiving past debts would allow students access federal aid to continue their education.

Mixed Messages Around “Purging” Students Due to Nonpayment

At the beginning of each semester, registered students receive messages from the colleges advising them to drop all classes they do not plan to attend. They also receive messages stating they will be “purged” or dropped from classes for which they have not paid. Many students assume they will be dropped for nonpayment, when in fact, their financial aid has been put in place, covering tuition. Students assume they have been dropped and never attend class, resulting in their aid being taken back. The student is then responsible for paying for that class. When students try to

Provide clear and concise messages to students regarding:
1.) when their financial aid is in place and its implications
2.) their registration status at the time they are encouraged to drop classes they do not plan to attend

Target messages about being “purged” to students who will be dropped due to nonpayment rather than sending the message to all students.

“People don’t understand how those past due balances happen. Most often, it isn’t a student just refusing to pay. It is usually a situation where the student didn’t understand he was still registered for classes.”

register at a later date, they
discover the past due balance.

TN STATE POLICY/PROGRAM	INEQUITY CREATED	POSSIBLE SOLUTION	NOTABLE QUOTE FROM STAKEHOLDER
<p>Requirement that Undocumented Students Pay Out of State Tuition (Lack of Tuition Equity in Tennessee)</p>	<p>Undocumented students, regardless of residency, must pay out of state tuition at all public Tennessee institutions. They are ineligible for all federal and state aid programs. They are ineligible for all state scholarship programs, including TN Promise.</p> <p>Undocumented students are also ineligible for the Dual Enrollment Grant, meaning they also cannot take college classes for free while still in high school.</p>	<p>Remove out of state tuition at community colleges, similar to TCATs, one cost of tuition for all students</p> <p>Adopt tuition equity for all students who are Tennessee residents and/or graduate from a Tennessee high school</p> <p>Remove the citizenship requirement for the Dual Enrollment Grant</p> <p>Create more early/middle college opportunities for undocumented students, as students participating in these schools do not have to pay out of state tuition.</p>	
<p>Dual Enrollment Eligibility and Dual Enrollment Grant Requirements</p>	<p>Requiring a 19/21 ACT sub score to enroll in dual enrollment courses limits the number of students who can participate in these courses, as research has shown standardized tests are biased against students of color and low-income students.</p> <p>Requiring students earn a 2.75 GPA to maintain their dual enrollment funding is difficult for low-income students and students of color, as these students often have multiple</p>	<p>Continue to pursue multiple measures for determining if a student is “ready” to participate in dual enrollment courses.</p> <p>Provide more academic supports to students participating in dual enrollment classes.</p>	<p>“We need to make sure the students in these classes have the supports they need to succeed – not just academic tutorial online.”</p> <p>“We don’t place students on academic probation at a four-year university for a 2.7 GPA, but we are seeing that with Dual Enrollment. Many of the students lose their grant with a C but they still get the college credit.”</p>

	responsibilities outside of their schoolwork.		
TN Promise Full-time Requirement	<p>Many low-income students and students of color cannot attend college full time due to needing to work to contribute to their family income.</p> <p>As shared in the Tennessee Comptroller of the Treasury Office of Research and Education Accountability’s Tennessee Promise Evaluation, “Once Promise students enroll in college, they are required to meet several requirements to maintain Promise eligibility, including taking classes full time, maintaining a cumulative 2.0 GPA, refiling the FAFSA annually, and completing eight hours of community service each semester...There are more requirements for Promise students than for other public scholarships.”</p>	<p>Remove the requirement that TN Promise students take 12 credit hours per semester. Require students to enroll in a minimum of 6 credit hours per semester, aligning with other TN state aid programs such as HOPE, TSAA and TN Reconnect.</p>	<p>“The idea that people graduate faster is only accurate if you keep them.”</p> <p>“It is ridiculous to tell students to fail a class in order to keep a scholarship [to meet full-time and continuous enrollment requirements], but we do. They need to have an allowance to have two semesters where you could drop below 12 hours.”</p>
TN Promise – Deadlines, Mandatory Meetings and Community Service Requirements	<p>As shared in the Tennessee Comptroller of the Treasury Office of Research and Education Accountability’s Tennessee Promise Evaluation, “students who apply to the program in their senior year, though, 70 percent do not complete program</p>	<p>Align deadlines with higher education institution deadlines.</p> <p>As shared in the Tennessee Comptroller of the Treasury Office of Research and Education Accountability’s Tennessee Promise Evaluation, policymakers could</p>	<p>“The deadlines do not align with what all higher education institutions need or what the students need, rather they are just arbitrary – only set up to meet the program’s needs.”</p>

	<p>requirements and, therefore, cannot enter the program. The requirements that the highest percent of Promise applicants missed were the mandatory mentor meeting and the community service requirements.”</p> <p>Students of color and low-income students may not be able to meet certain deadlines due to extenuating circumstances. These students are also likely to have challenges attending required orientation and mentor meetings, as they often do not have access to reliable transportation.</p>	<p>consider removing meeting requirements (make them optional) or hosting the mandatory meetings during the school day, so students are not forced to find transportation to/from the meetings.</p> <p>Policymakers could also consider removing the requirement of 8 hours of community service. Other options include providing opportunities for students to complete these hours during the school day or allowing a substitute of community service hours with work-based learning hours earned at part and full-time jobs.</p>	<p>“Promise deadlines bump up against student aid award numbers. We don’t project if a student is going to be Promise eligible until after July 1 – the community service requirement. Students don’t want to register until they know how much aid they will have. By the time we can tell them, they are some of the last students to register, and that results in these students being less successful. Additionally, we don’t know what our tuition and fees will be until July 1 due to TBR not voting on this until the June board meeting each year.”</p>
<p>TN Promise Last Dollar Design – Covers Tuition and Mandatory Fees After Gift Aid Has Been Awarded. It Does Not Cover Books or Non-mandatory Fees.</p>	<p>Low-income students who complete the Free Application for Federal Student Aid qualify for the Pell Grant, which covers tuition and fees at TN community colleges. Because TN Promise is a last dollar scholarship, students who receive full Pell grants do not receive any Promise dollars. Books, supplies, transportation, food, and lodging are all costs the student must then find other funding to cover the total cost of attendance.</p>	<p>As shared in the Tennessee Comptroller of the Treasury Office of Research and Education Accountability’s Tennessee Promise Evaluation, “through interviews and surveys with OREA [Office of Research and Education Accountability], college officials cited several barriers to Promise students’ academic success, including the full-time enrollment requirement in the summer term, and costs not covered by the Promise program. Adjustments to those elements of the program, among others, would likely allow more</p>	<p>“TN Promise is so great in theory but not in practice because it doesn’t cover the full costs of attending college. It covers nothing for our students who are Pell eligible. It is only working for middle- and high-income students.”</p>

		<p>students to remain Promise eligible and enrolled in college.</p> <p>As shared in the Tennessee Comptroller of the Treasury Office of Research and Education Accountability’s Tennessee Promise Evaluation, “The General Assembly could allow the Promise scholarship to cover some or all books, non-mandatory fees, tools, and supplies for students who exhibit financial need.”</p>	
<p>TN Ready Graduate Metrics and State Takeover Metrics</p>	<p>Research shows that standardized tests are biased against students of color and low-income students. Standardized test scores are not reliable indicators of college success. Despite this research, pressure is put on students to reach certain scores. Regardless of postsecondary plans (as Colleges of Applied Technology and other open admissions institutions do not require standardized test scores), some students are pushed to earn a 21 ACT sub score because it is the Ready Graduate Metric by which schools are measured.</p> <p>Ready Graduate is 20% of a school’s accountability, resulting in schools chasing Ready</p>	<p>Remove ACT as a Ready Graduate metric and as a metric for state takeover of a school.</p> <p>Provide different levels of Ready Graduate measures based on a student’s postsecondary plans</p>	<p>“We are still thinking about Ready Graduate and what a graduate looks like through the lens of one type of student.”</p>

	<p>Graduate metrics. For example, one metric is to complete two EPSOs and earn an industry certification. To meet this metric, students complete three “easy” industry credentials (OSHA 10, Excel, Adobe, Office) rather than take courses that would improve their academic and college readiness.</p>		
<p>2022 Proposed TN Investment in Student Achievement’s Incentivized Funding Formula</p>	<p>Districts serving students of color and low-income students enter the funding formula at a disadvantage as they are struggling against conditions created by poverty that are outside the school system.</p> <p>MNPS faces higher operating costs than small, rural districts across the state.</p> <p>State calculations for defining an economically disadvantaged student do not account for the high cost of living within metro areas such as Nashville.</p>	<p>Adjust the base funding amount for a student by the county’s Cost Differential Factor (as calculated by the Boyd Center for Economic Research at the University of Tennessee), resulting in a more realistic and accurate measurement for the cost of educating a student.</p> <p>Allow districts to supplement economically advantaged numbers with Free and Reduced-Price Lunch forms.</p> <p>Add TennCare enrollment to the definition of direct certification</p> <p>Establish a 50% funding floor for all districts to ensure a more equitable base in state funding for education.</p>	<p>“The thought behind the incentive funding is that the districts aren’t trying hard enough, but what that type of funding structure will actually do is make us feel like we don’t have a chance.”</p>
<p>TN Distressed Counties - Preferential Treatment of Certain Counties by State Agencies and the State Legislature Due to Their</p>	<p>Metro areas of TN, which serve more students of color, have distressed communities within “competitive” and “transitional”</p>	<p>Open state funding to distressed communities. Do not limit state programs and funding opportunities to the distressed counties. Give the</p>	<p>“People think of Nashville as an economically thriving city, but that success is so concentrated. In rural</p>

<p>Designation as a Distressed County According to the Appalachian Regional Commission Index</p>	<p>counties. The “success” of the counties – based unemployment rate, per capita market income, and poverty rate – is determined by in-migration not by the degree/certification attainment of the local public-school graduates. Numbers within these distressed communities rival the distressed county numbers.</p>	<p>same priority points to the distressed communities that are given to the distressed counties in funding competitions.</p>	<p>communities every kid goes to the public school; there are no other options, but here we have the private system that pulls kids from our system. It’s against interest here for people to advocate for public schools because that equals more taxes for them, and they don’t even use the system.”</p>
<p>Poor-Quality State Data Sets (Self-Reported) on Career Technical Education Concentrators</p>	<p>The lack of high-quality data limits the decisions administrators and educators can make for CTE students.</p>	<p>Provide P20 Connect TN, longitudinal data system that provides a 360-degree view of students connecting data from K-12 education, higher education, and workforce development, access to local TN school districts to create data-driven improvement.</p>	
<p>TBR Admission Policy Requiring Students Submit All Previously Attended College Transcripts</p>	<p>Colleges withhold transcripts from students who owe balances. Many low-income students try to register at community colleges after unsuccessful attempts at other colleges, especially for-profit colleges. TBR institutions cannot admit a student without a transcript from each previously attended college.</p>	<p>Tennessee public and not-for-profit private institutions should establish a “Promise to Pay” program similar to the one between all TBR institutions. The program should allow students to register for classes at a new institution so long as they sign an agreement stating they will pay back the balance by the time they graduate.</p>	<p>“We know about every institution attended because financial aid runs reports allowing us to see the prior aid history of that student. The financial aid office then sends that report to admissions, where a hold is placed on the student until they can get the transcripts.”</p>

NASHVILLE POLICY/PROGRAM	INEQUITY CREATED	POSSIBLE SOLUTION	NOTABLE QUOTE FROM STAKEHOLDER
<p>Misalignment Between CTE Standards and what Nashville Industry Needs to Hire Students</p>	<p>When curriculum is standardized at the state level, success is set by the lowest denominator to create “equity” across the state. For example, if XYZ IT script is outdated, but mastery in XYZ is what is needed by industry in a rural county, it becomes the baseline for the standardization. If metro area industries state they need ABC IT script (a newer updated script) mastery, K12 schools are unable to offer certified classes toward mastery because their CTE classes must align with the state standardized curriculum which requires mastery of XYZ.</p> <p>Metro areas of the state serve more students of color than rural areas of the state. Students of color in metro areas are graduating from pathways of study that are not necessarily aligned to the workforce needs of their communities.</p>	<p>Allow local industry, economy and workforce demands to determine CTE course offerings. To ensure quality, track job placement and earnings. The nine TN Local Workforce Development Areas could provide geographic boundaries.</p> <p>Academy partners and other MNPS employer partners could commit to offering a certain number of work-based learning positions each year to ensure students are getting the experiences they need to succeed.</p>	<p>“While CTE pathways are currently state “certified,” are we tracking if they are successful? Are we tracking if those students are getting jobs and what they are making?”</p> <p>“Oracle is here but Oracle’s certification is nowhere on TN’s list of certifications. Google has fallen out of favor with the state, but it’s a way students can get work.”</p>
<p>Requirement that Students Participating in Work-Based Learning Opportunities Must have a Social Security Number/Partnering Employers Require I9s</p>	<p>Removes the opportunity for undocumented students to participate in work-based learning experiences</p>	<p>Partner with organizations who are able to pay students via stipends rather than placing students on company pay rolls.</p>	<p>“But when many students see an application that asks for a social security number their parents tell them to run away because they are afraid of being deported.”</p>

<p>Limited Number of Hours Offered Through Work-Based Learning Opportunities</p>	<p>Many low-income students must work 30+ hours each week to contribute to their family's finances. They cannot participate in WBL opportunities because they must work more hours than the programs offer.</p>	<p>Work with WBL employers to ensure they can offer students more hours if needed.</p>	
<p>Traditional School Day Model</p>	<p>The traditional 8-hour school day doesn't benefit all students as some students experiencing poverty need alternative schedules due to family and financial responsibilities.</p>	<p>Pursue models that allow students to attend HS part time while they are also working. The jobs students take could be intentional and align with pathway curriculum and local workforce needs. Potential models include block scheduling (4 hours of learning and 4 hours of work/learn) or an alternate day schedule that creates opportunities to participate in internships and jobs on non-classroom days, such as Big Picture High School.</p> <p>Pursue models of different start times to allow students flexibility to meet their families' needs rather than drop out due to truancy.</p>	<p>"You have this traditional model that impacts us being able to truly prepare all students. It's hard for me to explain to some students why they need certain things – when truly it is just because it is a state requirement."</p> <p>"I like the idea of having schools that start at different times – if the city and federal levels aren't going to address poverty then it doesn't make sense to punish them for being poor."</p>
<p>Lack of Reliable Transportation</p>	<p>In theory, students can select, enroll, and attend any MNPS academy based on their interest. If their zoned high school does not have the academy that reflects their interests, students can simply choose to attend a high school in a different zone that does. In practice, very few students have the resources, like</p>	<p>Pursue better public transit for Nashville secondary and postsecondary students.</p> <p>Pursue opportunities to bring employment opportunities to students either at the high school or at an Innovation Center similar to</p>	<p>"In work-based learning job descriptions, we are having to write that you must have your own transportation. It would be great to say apply for this job and then if you have transportation issues, we will figure something out.</p>

	<p>reliable transportation, to take advantage of academies offered outside of their zoned school. This lack of resources limits the pathways and courses students can pursue.</p> <p>Students are unable to participate in work-based learning opportunities that require them to go to the employer, limiting their experiences and their ability to build social capital.</p> <p>Students enrolled in college face difficulties getting to and from campus and must rely on public transit or friends and family members for rides to class. Students must juggle public transit schedules with class and work schedules.</p>	<p>Williamson County (bus transportation provided).</p>	<p>But, if we don't have a sustainable plan then these students will never be able to participate. The transportation issue is something students are embarrassed about, so we don't even know who it is struggling with those issues."</p>
<p>Lack of Academic Transparency for Students</p>	<p>Students of color and low-income students are unaware of the implications of their grade point average. They are not frequently told what their GPA is, and they are unaware how to advocate for themselves.</p>	<p>Pursue a high school course dedicated each year that builds/extends the Freshman Seminar into each year.</p>	<p>"Students need the 'opportunity knowledge' at each year."</p>