



# Grants for Students with Intellectual and Developmental Disabilities Annual Report

February 15, 2022

**Author****Jacquelynn Mol Sletten**

Financial Aid Administrator

Tel: 651-355-0609

[Jacquelynn.mol.sletten@state.mn.us](mailto:Jacquelynn.mol.sletten@state.mn.us)

**About the Minnesota Office of Higher Education**

The Minnesota Office of Higher Education is a cabinet-level state agency providing students with financial aid programs and information to help them gain access to postsecondary education. The agency also serves as the state's clearinghouse for data, research and analysis on postsecondary enrollment, financial aid, finance and trends.

The Minnesota State Grant Program is the largest financial aid program administered by the Office of Higher Education, awarding more than \$210 million in need-based grants to Minnesota residents attending accredited institutions in Minnesota. The agency oversees tuition reciprocity programs, a student loan program, Minnesota's 529 College Savings Plan, licensing and early college awareness programs for youth.

**About This Report**

This is a legislative-mandated report. As requested by Minnesota Statutes, section 3.197, this report cost approximately \$2,041.91 to prepare, including staff time.

**Minnesota Office of Higher Education**

1450 Energy Park Drive, Suite 350

Saint Paul, MN 55108-5227

Tel: 651.642.0567 or 800.657.3866

TTY Relay: 800.627.3529

Fax: 651.642.0675

Email: [info.ohe@state.mn.us](mailto:info.ohe@state.mn.us)

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# Executive Summary

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The Grants for Students with Intellectual and Developmental Disabilities (ID Grant) program provides financial assistance to eligible Minnesota resident students with intellectual and developmental disabilities who attend eligible Minnesota postsecondary institutions. The grant program was established in fiscal year 2018 and has received \$1,200,000 total in state appropriations with no allocation for administrative costs. Despite having access to grant resources of ID Grant, Federal Pell Grant, Minnesota State Grant, Institutional Aid, and Other Government Aid, ID Grant students had nearly \$526,000 in unmet tuition and fee costs during fiscal year 2022. The Minnesota Office of Higher Education recommends the following for the program:

- Increase appropriation
- Add an income cap to eligibility requirements

# Introduction

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The Grants for Students with Intellectual and Developmental Disabilities (ID Grant) was established by the 2017 Minnesota Legislature (<https://www.revisor.mn.gov/statutes/cite/136A.1215>) to provide financial assistance toward tuition and fees to postsecondary students with intellectual and developmental disabilities enrolled in a Comprehensive Transition & Postsecondary (CTP) program at an eligible Minnesota postsecondary institution. Programs at three institutions qualified for the ID Grant during fiscal years 2022 through 2023:

- Bethel University – Saint Paul
  - Bethel University Integrated Learning and Development (BUILD) Program
    - <https://www.bethel.edu/academics/build/>
- Central Lakes College – Brainerd
  - Occupational Skills Program (OSP)
    - <http://www.clcmn.edu/occupational-skills-diploma-2/>
- Ridgewater Community College – Willmar
  - Occupational Skills Program (OSP)
    - <https://ridgewater.edu/academics/areas-of-study/occupational-skills/>

The Office of Higher Education (OHE) is responsible for issuing program guidance and providing funding awards to institutions. Institutions are responsible for meeting program deadlines set by OHE, identifying students, calculating awards, distributing award notifications, disbursing awards, adjusting awards, and refunding excess funds to OHE.

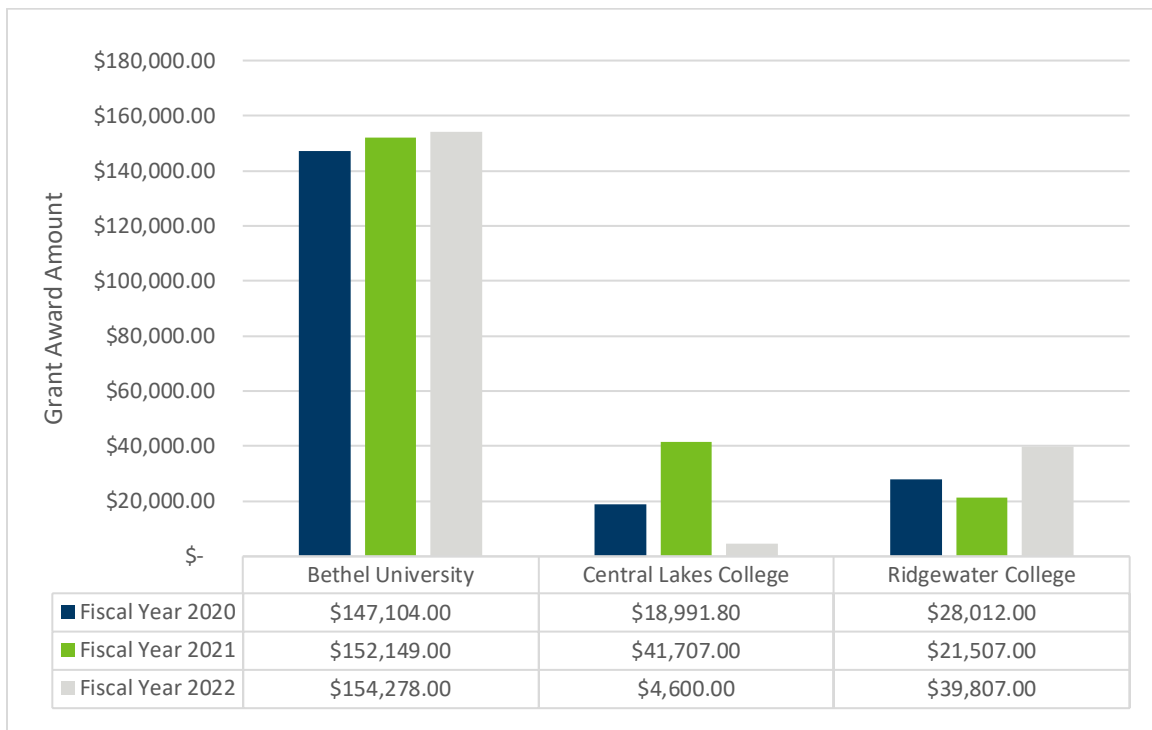
Per statute requirements, OHE submits this report annually by February 15 to legislative committees with jurisdiction over higher education finance and policy. The report includes, at minimum: (1) the number of students receiving an award; (2) the average and total award amounts; and (3) summary demographic data on award recipients.

# Financial Overview

The total ID Grant appropriation for biennial years 2022 and 2023 is \$400,000. The appropriation does not include funds for administrative costs. Currently, the total ID Grant disbursed to institutions for fiscal year 2022 is \$198,685.

The total ID Grant appropriation for biennial years 2020 and 2021 was \$400,000. The appropriation did not include funds for administrative costs. OHE transferred \$9,470.80 in surplus funds from other programs to the ID Grant appropriation for fiscal year 2021 in order to adequately award all eligible students. The total ID Grant disbursed to institutions for fiscal years 2020 and 2021 was \$409,470.80.

**Figure 1. Financial Overview - Grants for Students with Intellectual and Developmental Disabilities**



*Notes: Data for fiscal year 2022 is preliminary and will be updated in the next annual report.*

# Program

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## Postsecondary Institution Eligibility

To be eligible to award an ID Grant, an institution must meet all of the following conditions:

- Be located in Minnesota
- Offer a Comprehensive Transition and Postsecondary (CTP) program (degree, certificate, non-degree, or non-certificate program), as defined in the Code of Federal Regulations, title 34, section 668.231 ([Appendix B](#))
- Meet the definition of eligible institution, as defined in Minnesota Statute 136A. 103 (<https://www.revisor.mn.gov/statutes/cite/136A.103>)
- Have the necessary administrative computing capability to administer the program on campus and electronically report student data records to OHE
- Provide student-level data to OHE, including information on student financial aid from federal, state, and institutional sources

## Student Eligibility

To be eligible for an ID Grant, a student must meet all of the following conditions:

- Have an intellectual disability, as defined in the Code of Federal Regulations, title 34, section 668.231:
  - Cognitive impairment characterized by significant limitations in:
    - Intellectual and cognitive functioning
    - Adaptive behavior as expressed in conceptual, social, and practical adaptive skills
  - Currently, or was formerly, eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA), including a student who was determined eligible for special education or related services under the IDEA but was home-schooled or attended a private school
- Be enrolled in and attend a CTP program at an eligible Minnesota postsecondary institution
- Apply using the Free Application for Federal Student Aid (FAFSA) or the Minnesota state financial aid application
- Have tuition and fees not covered by the Federal Pell Grant, State Grant, or institutional aid
- Be a Minnesota resident as defined in Minnesota Statutes 136A.101, Subd. 8 (<https://www.revisor.mn.gov/statutes/cite/136A.101>)

- Be a graduate of a secondary school/GED recipient or be at least 17 years of age at the time of disbursement (high school students enrolled in postsecondary courses prior to receiving their high school diploma are not eligible for an ID Grant)
- Not be in default on a student educational loan
- Not be more than 30 days in arrears for child support payments owed to a public child support enforcement agency unless the student is complying with a written repayment plan

## Application Process

A student applies for an ID Grant by completing the FAFSA (<https://studentaid.ed.gov/sa/fafsa>). A student who is not a United States citizen or eligible non-citizen may apply for an ID Grant by completing the Minnesota state financial aid application (<http://www.ohe.state.mn.us/mPg.cfm?pageID=2056>).

To ensure available funds are distributed among eligible students in a timely manner, FAFSA and Minnesota state financial aid applications receive priority when completed prior to July 1 of the upcoming academic year. For example, an application completed prior to July 1, 2021 for academic year 2021 – 2022 (July 1, 2021 – June 30, 2022) would receive priority in the awarding process. Students with incomplete applications prior to or on July 1, or applications started on or after July 1, may be added to an institutional wait list as determined by the postsecondary institution.

## Award Process and Formula

On July 1 of each academic year, institutions submit the demographic and financial data of eligible students to OHE including, but not limited to:

- Student name
- Cost of attendance (COA)
- Expected Family Contribution (EFC)
- Tuition and fees
- Pell Grant
- Minnesota State Grant
- Institutional aid
- Other government aid

ID Grant funds cannot be used for books, supplies, transportation, housing, or other educational expenses. ID Grant awards are calculated based on the student's remaining need in the following calculation. A student must have remaining need of at least \$50 in order to receive an award.



Program tuition and fees for semester

- Federal Pell Grant (actually received by student)
- Minnesota State Grant (actually received by student)
- Institutional Aid
- = ID Grant ( $\leq$  Maximum ID Grant)

Based on availability of funds for each term, OHE determines a term maximum grant amount. Institutions then award eligible students up to the maximum grant amount or their remaining need, whichever is less. Throughout the term, OHE notifies institutions if there are any excess funds that can be used to make awards to any students on their institutional wait list. If there are excess funds after all eligible students have been awarded for the term, the funds are added to the amount of funds available for the next term.

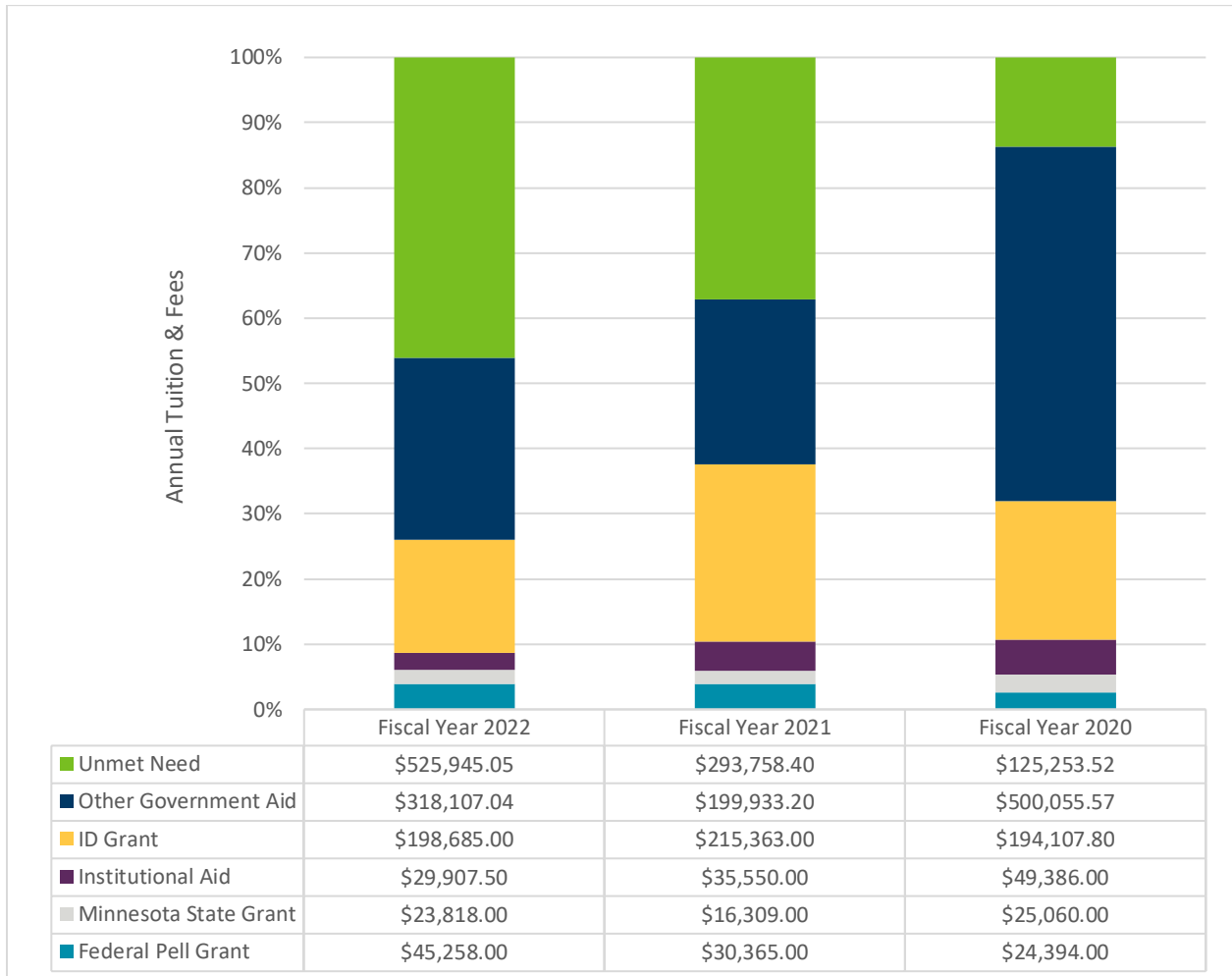
# Awards

## Overview

ID Grant data is specific to students who receive funding through the program. The data is not a representation of all students who have intellectual and developmental disabilities. For purposes of the ID Grant, OHE does not collect data on students attending CTP programs at the three institutions who are not eligible for the ID Grant. The main reason for ineligibility for a student is Federal Pell Grant and Minnesota State Grant cover all tuition and fees, and there is no remaining need for ID Grant.

The following 100 percent stack column chart provides an overview of sources of aid or unmet need for ID Grant students in the last three years:

**Figure 2. Aid Sources - Grants for Students with Intellectual and Developmental Disabilities**



Notes: Data for fiscal year 2022 is preliminary and will be updated in the next annual report.

## Fiscal Year 2022

Institutions submitted ID Grant rosters to OHE on July 1, 2021 and January 1, 2022. Rosters included data for 37 total eligible students during the academic year. At the end of the academic year, institutions will perform a final review of the rosters and provide confirmation to OHE by August 31, 2022.

Based on the July 1, roster data of students with financial need during fall 2021, OHE determined a maximum term award of \$2,857 per student. For spring 2022, based on student financial need, maximum term awards remained at \$2,857. The maximum grant in fiscal year 2022 was \$5,714.

The average ID Grant award for fall was \$2,776.54, and the average ID Grant award for spring was \$2,822.15. The average annual ID Grant award was \$5,369.86. The minimum annual ID Grant award was \$554, and the maximum annual ID Grant award was \$5,714.

Due to the Data Suppression Policy for Student Information ([Appendix D](#)), the total number of students per institution is not reported in the upcoming table.

**Table 1. Fiscal Year 2022 Students and Awards - Grants for Students with Intellectual and Developmental Disabilities**

Postsecondary Institution	Total Students	Fall 2021 Awards	Spring 2022 Awards	Total Awards
Bethel University	>10	\$79,996.00	\$74,282.00	\$154,278.00
Central Lakes College	<10	\$2,795.00	\$1,805.00	\$4,600.00
Ridgewater Community College	<10	\$19,941.00	\$19,866.00	\$39,807.00
<b>Totals</b>	37	\$102,732.00	\$95,953.00	\$198,685.00

*Notes: Awards refer to ID grant amount awarded and disbursed to students as estimated by institutions. Data for fiscal year 2022 is preliminary and will be updated in the next annual report.*

The annual tuition and fees charged to ID Grant students for FY2022 was \$1,141,720.59. The annual sum of Federal Pell Grant, Minnesota State Grant, and Institutional Aid was \$98,983.50. The remaining tuition and fee balance was \$1,042,737.09. The ID Grant contributed \$198,685, and Other Government Aid contributed \$318,107.04 towards to remaining tuition and fee balances. Even after applying all aid sources, the 37 ID Grant students still had \$525,945.05 in tuition and fee charges that were not covered by the aid sources.

## Fiscal Year 2021

Institutions submitted ID Grant rosters to OHE on July 1, 2020 and January 1, 2021. At the end of the academic year, institutions performed a final review of the rosters and provided confirmation to OHE by August 31, 2021. Rosters included data for 30 total eligible students during the academic year.

Based on the July 1 roster data of students with financial need during fall 2020, OHE determined a maximum term award of \$3,649 per student. For spring 2021, based on student financial need, maximum term awards were increased to \$4,625. The maximum grant in fiscal year 2021 was \$8,274.

The average ID Grant award for fall was \$3,361.83, and the average ID Grant award for spring was \$3,948.55. The average annual ID Grant award was \$7,178.77. The minimum annual ID Grant award was \$1,430, and the maximum annual ID Grant award was \$8,274.

Due to the Data Suppression Policy for Student Information ([Appendix D](#)), the total number of students per institution is not reported in the upcoming table.

**Table 2. Fiscal Year 2021 Students and Awards - Grants for Students with Intellectual and Developmental Disabilities**

Postsecondary Institution	Total Students	Fall 2020 Awards	Spring 2021 Awards	Total Awards
Bethel University	>10	\$68,899.00	\$83,250.00	\$152,149.00
Central Lakes College	<10	\$20,896.00	\$20,811.00	\$41,707.00
Ridgewater Community College	<10	\$11,060.00	\$10,447.00	\$21,507.00
<b>Totals</b>	30	\$100,855.00	\$114,508.00	\$215,363.00

*Notes: Awards refer to ID grant amount awarded and disbursed to students as reported by institutions.*

The annual tuition and fees charged to ID Grant students for FY2021 was \$791,278.60. The annual sum of Federal Pell Grant, Minnesota State Grant, and Institutional Aid was \$82,224. The remaining tuition and fee balance was \$709,054.60. The ID Grant contributed \$215,363, and Other Government Aid contributed \$199,933.20 towards to remaining tuition and fee balances. Even after applying all aid sources, the 30 ID Grant students still had \$293,758.40 in tuition and fee charges that were not covered by the aid sources.

## Fiscal Year 2020

Institutions submitted ID Grant rosters to OHE on July 1, 2019 and January 1, 2020. At the end of the academic year, institutions performed a final review of the rosters and provided confirmation to OHE by August 31, 2020. Rosters included data for 34 total eligible students during the academic year.

Based on the July 1 roster data of students with financial need during fall 2019, OHE determined a maximum term award of \$2,857 per student. For spring 2020, based on student financial need, maximum term awards were increased to \$3,857. The maximum grant in fiscal year 2020 was \$6,714.

The average ID Grant award for fall was \$2,595.78, and the average ID Grant award for spring was \$3,286.27. The average annual ID Grant award was \$5,709.05. The minimum annual ID Grant award was \$813, and the maximum annual ID Grant award was \$6,714.

Due to the Data Suppression Policy for Student Information ([Appendix D](#)), the total number of students per institution is not reported in the upcoming table.

**Table 3. Fiscal Year 2020 Students and Awards - Grants for Students with Intellectual and Developmental Disabilities**

<b>Postsecondary Institution</b>	<b>Total Students</b>	<b>Fall 2019 Awards</b>	<b>Spring 2020 Awards</b>	<b>Total Awards</b>
Bethel University	>10	\$62,854.00	\$84,250.00	\$147,104.00
Central Lakes College	<10	\$9,406.80	\$9,585.00	\$18,991.80
Ridgewater Community College	<10	\$13,400.00	\$14,612.00	\$28,012.00
<b>Totals</b>	34	\$85,660.80	\$108,447.00	\$194,107.80

*Notes: Awards refer to ID grant amount awarded and disbursed to students as reported by institutions.*

The annual tuition and fees charged to ID Grant students for FY2020 was \$918,256.86. The annual sum of Federal Pell Grant, Minnesota State Grant, and Institutional Aid was \$98,840. The remaining tuition and fee balance was \$819,416.86. The ID Grant contributed \$194,107.80, and Other Government Aid contributed \$500,055.57 towards to remaining tuition and fee balances. Even after applying all aid sources, the 34 ID Grant students still had \$125,253.49 in tuition and fee charges that were not covered by the aid sources.

# Demographics

The demographics section of this report includes 104 unique ID Grant students from fiscal years 2019 through 2022. Several ID Grant students participated in multiple fiscal years. Data from the most recent fiscal year was maintained for each student. This section reflects FAFSA data pertaining to age, dependency status, race and ethnicity, gender, and income group.

The average age of ID Grant students was 20 years. The maximum age was 26 years and minimum age was 18 years. Nearly all of ID Grant students had FAFSA dependency status of dependent. Dependent students are under the age of 24 years old, single, and are required to provide parent information on the FAFSA.

Due to the Data Suppression Policy for Student Information ([Appendix D](#)), the only race and ethnicity information that can be disclosed is that about 57 percent of ID Grant students identified as White with about an additional 35 percent identified as unavailable.

As shown in Figure 2, ID Grant students who identified as male exceeded students who identified as female, although data for 32 percent of ID Grant students was unavailable.

**Figure 3. Gender – Grants for Students with Intellectual and Developmental Disabilities**

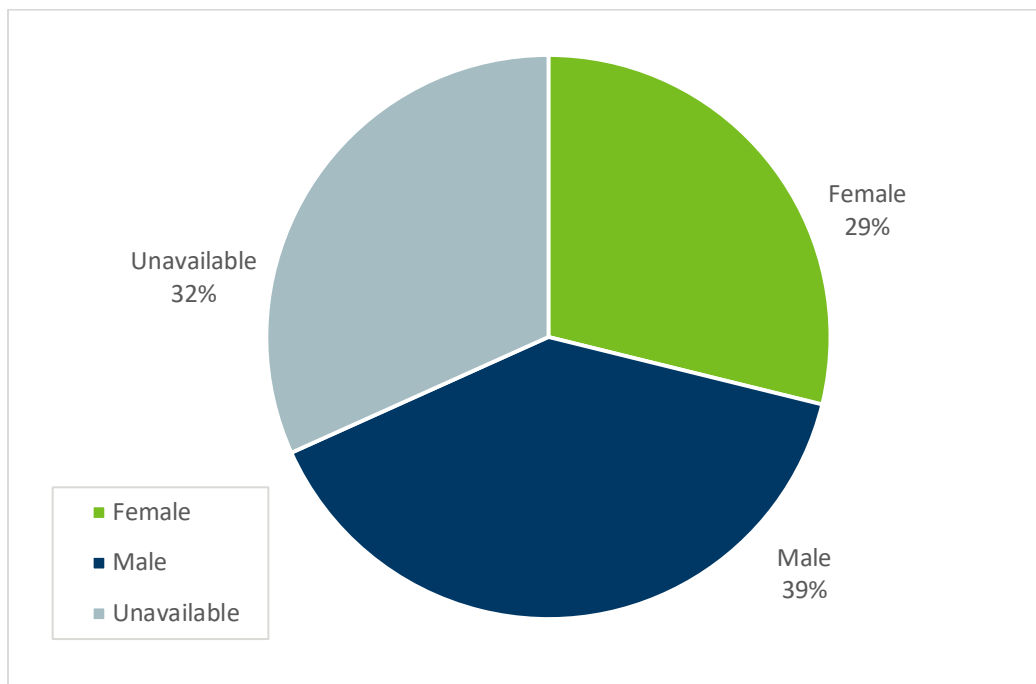
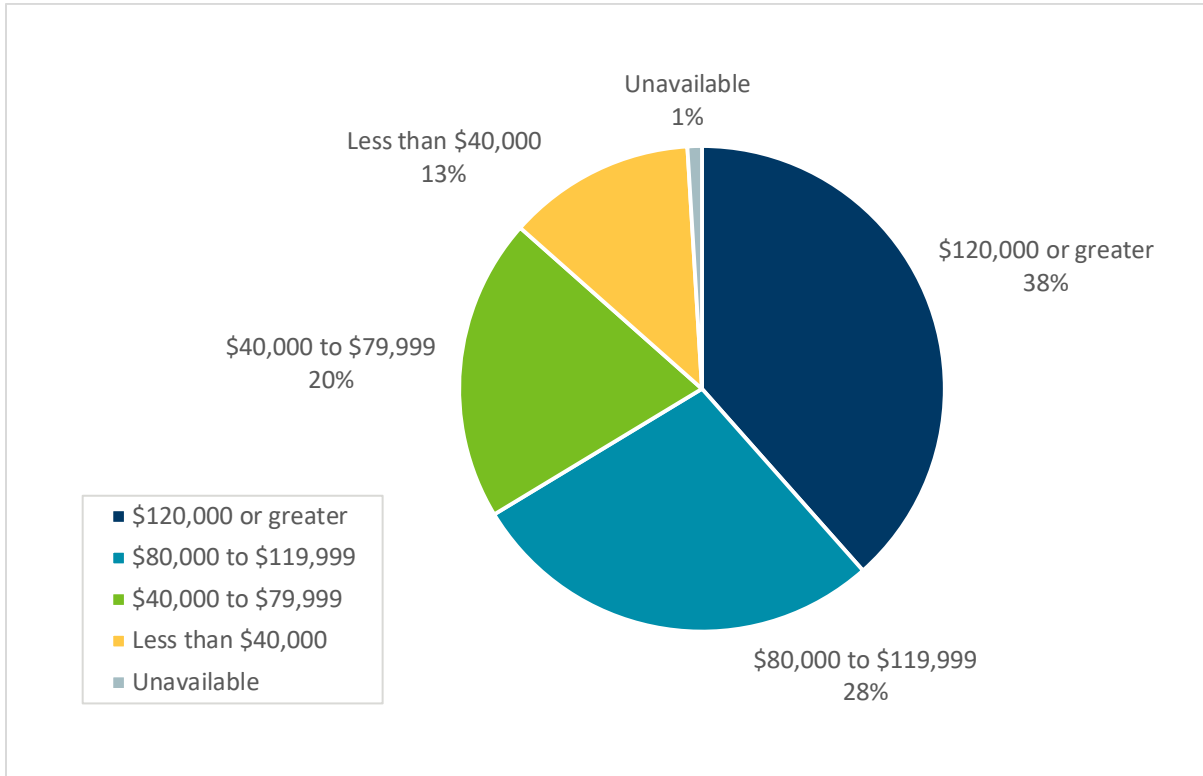


Figure 4 depicts several income groups for ID Grant students. Income group data was based upon parent adjusted gross income for dependent students and student adjusted gross income for independent students. Sixty-six percent of students receiving ID Grant funds have household adjusted gross incomes

of \$80,000 or greater. Only 13 percent of ID Grant students have household adjusted gross incomes of less than \$40,000. Although not delineated in Figure 4, 16 percent of ID Grant students have household adjusted gross incomes of more than \$250,000.

**Figure 4. Adjusted Gross Income - Grants for Students with Intellectual and Developmental Disabilities**



# Recommendations

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The Office of Higher Education puts forth recommendations based upon this report and conversations with postsecondary institutions and stakeholder groups. One stakeholder group, Minnesota Inclusive Higher Education Consortium (MIHEC), strongly advocates for the expansion of postsecondary education opportunities in Minnesota for all individuals with intellectual and developmental disabilities. MIHEC provided OHE with a detailed summary of their recent efforts and future goals (see [Appendix C](#)).

## Recommendation 1: Increase ID Grant appropriation.

Each fiscal year, the combination of ID Grant, Federal Pell Grant, Minnesota State Grant, Institutional Aid, and Other Government Aid does not meet the tuition and fees need for ID Grant students. During fiscal year 2022, nearly \$526,000 of financial need was unmet by the various funding sources. ID Grant students rely mostly on other government aid to support their education. An appropriation increase would lessen the financial burden of tuition and fees for ID Grant students.

## Recommendation 2: Add an income cap to the eligibility requirements.

As shown earlier in this report, 66 percent of students receiving ID Grant funds have household adjusted gross incomes of \$80,000 or greater. Sixteen percent of students have household adjusted gross incomes of \$250,000 or greater. An income cap for eligibility would allow funds to serve students with higher financial need, especially with limited appropriation funds.

The Office of Higher Education welcomes questions and further discussion regarding the recommendations for Grants for Students with Intellectual and Developmental Disabilities.



# Appendix A:

## Minnesota Statutes Governing Grants for Students with Intellectual and Developmental Disabilities

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2021 Minnesota Statutes

### **136A.1215 GRANTS FOR STUDENTS WITH INTELLECTUAL AND DEVELOPMENTAL DISABILITIES.**

**Subdivision 1. Establishment.** A program is established to provide financial assistance to students with intellectual and developmental disabilities that attend a Minnesota postsecondary institution.

**Subd. 2. Eligible students.** A postsecondary student is eligible for a grant under this section if the student:

- 1) meets the eligibility requirements in section [136A.121, subdivision 2](#)<sup>1</sup>;
- 2) is a student with an intellectual disability, as defined in Code of Federal Regulations, title 34, section 668.231, and is enrolled in a comprehensive transition and postsecondary program under that section; and
- 3) attends an eligible institution, as defined in section [136A.101, subdivision 4](#)<sup>2</sup>.

**Subd. 3. Application.** To receive a grant under this section, a student must apply in the form and manner specified by the commissioner.

**Subd. 4. Maximum grant amounts.** (a) The amount of a grant under this section equals the tuition and fees at the student's postsecondary institution, minus:

- 1) any Pell or state grants the student receives; and
- 2) any institutional aid the student receives.
- 3) If appropriations are insufficient to provide the full amount calculated under paragraph (a) to all eligible applicants, the commissioner must reduce the maximum grant amount available to recipients.

**Subd. 5. Reporting.** By February 15 of each year, the commissioner of higher education must submit a report on the details of the program under this section to the legislative committees with jurisdiction over higher education finance and policy. The report must include the following information, broken out by postsecondary institution:

- 1) the number of students receiving an award;
- 2) the average and total award amounts; and
- 3) summary demographic data on award recipients.

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<sup>1</sup> <https://www.revisor.mn.gov/statutes/cite/136A.121#stat.136A.121.2>

<sup>2</sup> <https://www.revisor.mn.gov/statutes/cite/136A.101#stat.136A.101.4>

# Appendix B:

## Federal Regulations Governing Financial Assistance for Students with Intellectual Disabilities

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### 2021 Federal Regulations

#### **§ 668.231 Definitions.**

The following definitions apply to this subpart: *Comprehensive transition and postsecondary program* means a degree, certificate, non-degree, or non-certificate program that:

- 1) Is offered by a participating institution;
- 2) Is delivered to students physically attending the institution;
- 3) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment;
- 4) Includes an advising and curriculum structure;
- 5) Requires students with intellectual disabilities to have at least one-half of their participation in the program, as determined by the institution, focus on academic components through one or more of the following activities:
  - a. Taking credit-bearing courses with students without disabilities.
  - b. Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit.
  - c. Taking non-credit-bearing, non-degree courses with students without disabilities.
  - d. Participating in internships or work-based training in settings with individuals without disabilities; and
- 6) Provides students with intellectual disabilities opportunities to participate in coursework and other activities with students without disabilities.

## Appendix C:

# Minnesota Inclusive Higher Education Consortium 2021 Annual Report

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The Minnesota Inclusive Higher Education Consortium (MIHEC) is a parent-led collaborative group of stakeholders including higher education institutions, local education agencies (LEAs), state agencies, advocates, families, legislators, and nonprofits. MIHEC is committed to expanding Minnesota postsecondary education enrollment to all interested youth, young adults, and adults with intellectual disabilities (ID), including students from diverse ethnic, cultural, linguistic, geographic, and socio-economic backgrounds. MIHEC's efforts to increase Minnesota inclusive higher education opportunities for students with ID address the limited postsecondary enrollment options, low attainment rates and poor education, employment, and adult living outcomes for Minnesotans with ID. MIHEC has coalesced around increasing postsecondary education options for Minnesotans with ID that lead to earning meaningful credentials, an expanded qualified workforce pool, positive adult outcomes, and continued economic growth and prosperity for the business community and the State of Minnesota.

Minnesota passed into law an excellent education attainment goal that 70% of Minnesotan adults (age 25-44 year) will attain a postsecondary certificate or degree by 2025.<sup>1</sup> While attainment rate data is not available for Minnesotans with ID, it is reasonable to recognize a significant attainment gap. It is estimated that less than 3% of Minnesotans with ID are able to access and attend college let alone earn a certificate or degree. Minnesota currently has three institutions of higher education that have the Comprehensive Transition and Postsecondary Program (CTP)<sup>2</sup> designation and accept students with ID. Their combined enrollment capacity is 90 students with ID. There are approximately 1,000 Minnesota students with ID completing 12th grade each year.<sup>3</sup> This translates to an estimated 5,000 college age Minnesotans with ID between the ages of 18-22 who are potential college students. In order for Minnesotans with ID to participate in the 70% education attainment goal, addressing the limited capacity of Minnesota inclusive higher education is imperative. Increased Minnesota inclusive higher education capacity will provide an opportunity for more Minnesotans with ID to earn a postsecondary credential. Earning a postsecondary credential is the dominant pathway to higher rates of employment

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<sup>1</sup> Minnesota Office of Higher Education report Educating for the Future 2021 Update – October 2021 Report Available online: [https://www.ohe.state.mn.us/pdf/EducatingfortheFuture2021\\_final.pdf](https://www.ohe.state.mn.us/pdf/EducatingfortheFuture2021_final.pdf) (accessed on 3 January 2022).

<sup>2</sup> A Comprehensive Transition and Postsecondary Program (CTP) designation is provided by the US Department of Education. Students with ID who attend a college with the CTP designation are eligible to apply for and receive federal financial aid.

<sup>3</sup> Student data sourced from the Minnesota Department of Education MARSS Child Count Total December 2020 Report.

and improved earnings. The Georgetown University Center on Education and the Workforce predicts that 70% of all jobs will require some education beyond high school by 2027.<sup>4</sup>

The benefits of inclusive higher education are clear.<sup>5</sup> Students with ID who attend college are more successful in obtaining employment and earning higher wages. In addition, the benefits go beyond employment and include positive feelings of self-worth, better physical health, healthier relationships, and more graduates with ID who live independently after college. Institutions of higher education enrolling students with ID benefit by furthering the institution's equity, diversity, and inclusion mission. The campus community becomes more welcoming and faculty gain confidence and skills to instruct and mentor a more diverse range of students with different learning styles, educational experiences, and capabilities.

Minnesota institutions of higher education are faced with persistent resource and funding barriers that are impeding progress to expand inclusive higher education options for students with ID. In addition, the COVID-19 pandemic has increased the pressures within higher education and stretched faculty and resources. These conditions amplify the importance of addressing the necessary resources, tools, and funding that a Minnesota college or university needs to expand enrollment for students with ID. MIHEC is committed to providing resources and tools through technical assistance and recommending public policy to establish initial funding for Minnesota colleges and universities to plan and offer self-sustaining inclusive higher education initiatives for students with ID.

2022 MIHEC priorities include:

- Create a technical assistance center
- Offer MIHEC learning community events and community-of-practice gatherings
- Expand community outreach and awareness
- Develop Minnesota inclusive higher education tools and resources
- Serve as a resource for policy advocates and policymakers

## Technical Assistance Capacity

MIHEC's efforts to institute a technical assistance center is spurred on by the positive outcomes from postsecondary education. A key to building technical assistance capacity is the stakeholder relationships. MIHEC has diligently welcomed and engaged a broad cross section of key stakeholders leading to more Minnesota institutions of higher education, state agencies, nonprofits, families, and ally organizations joining the consortium. Furthermore, MIHEC has an innovative working partnership with Think College.<sup>6</sup> This collaboration leverages and blends the Minnesota-based expertise with the National Coordinating Center's expertise, resources and professional network. MIHEC strives to bring together the best

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<sup>4</sup> Blumenstyk, G. By 2020, They Said, 2 Out of 3 Jobs Would Need More Than a High-School Diploma. Were They Right? The Edge: The Chronicle of Higher Education. Available online: <https://www.chronicle.com/newsletter/the-edge/2020-01-22> (accessed on 3 January 2022).

<sup>5</sup> MDPI peer reviewed article "Advancing Access to Higher Education for Students with Intellectual Disabilities in the United States Available online: <https://www.mdpi.com/2673-7272/1/4/30> (accessed on 3 January 2022)

<sup>6</sup> Think College is the National Coordination Center based at the Institute of Community Inclusion, University of Massachusetts Boston. Available online: <https://www.thinkcollege.net> (accessed on 3 January 2022)

practice resources and expertise to provide technical assistance to Minnesota institutions of higher education. MIHEC is actively involved in Think College Affinity groups that provide opportunities for networking, learning, and sharing with colleagues from across the country. As MIHEC's host organization, the Institute on Community Integration (ICI) at the University of Minnesota strengthens MIHEC through the vast disability related expertise and experience as a designated University Center for Excellence in Developmental Disabilities and the six Affiliated Centers that complete research, inform public policy and practice, and provide technical assistance. ICI is also pursuing and leveraging funding opportunities that will support MIHEC's work. In the meantime, ICI is providing limited administrative services and funding for MIHEC core activities.

## **Learning Community Events**

In 2021, MIHEC held six learning community events with presenters from institutions of higher education across the country as well as local experts in areas such as person-centered planning, natural peer support, and job coaching. MIHEC strives to offer community-of-practice gatherings for institutions of higher education in 2022.

## **Outreach and Awareness Activities**

MIHEC members presented about inclusive higher education and students with ID at several universities, nonprofits, Think College Affinity groups, OHE Public Engagement Calls, and the Minnesota Governor's Council on Developmental Disabilities Partners Graduate Workshops. The participants ranged from Minnesotans with ID, parents, college students, faculty, and MN Leadership Education in Neurodevelopmental and Related Disabilities (LEND) fellows. Outreach is an effective way to connect with key stakeholders and build positive momentum.

## **Tool and Resource Development**

MIHEC is identifying and developing tools and resources to assist with establishing new or enhancing existing Minnesota inclusive higher education options. The tools and resources are in addition to the CTP designation, accreditation standards, and inclusive higher education guiding principles. The intent is to have readily available tools and resources for institutions of higher education to establish self-sustaining inclusive higher education initiatives across the state. The goal is to shorten the learning curve for faculty leading a campus initiative and avoid duplication of effort. Technical assistance is a service available and provided to interested institutions of higher education. Currently, a number of Minnesota colleges and universities are exploring enrollment for students with ID. The prospect of new initiatives brings hope and motivation.

## **Public Policy Resource**

Researching, understanding, and identifying public policy changes necessary to expand inclusive higher education options in Minnesota is another area of focus. MIHEC is a resource to The Arc Minnesota and

legislators for proposing state legislation. MIHEC members are available to meet with legislators and testify at legislative committee hearings.

Opening up opportunities for students with ID to pursue a postsecondary education aligns with the State's efforts to advance access to postsecondary education, increase the education attainment rate, and improve adult outcomes for Minnesotans with ID. Given the chance, students with ID can make informed choices through person-directed planning, pursue a postsecondary education, earn meaningful credentials, and earn a competitive wage in a career of their choice. All Minnesotans have a vested interest in students with ID becoming credentialed employees contributing to their community and our statewide economy.

MIHEC is committed to the ongoing collaboration with the Office of Higher Education to expand Minnesota inclusive higher education options for students with ID. MIHEC continues advocating for and pursuing funding to achieve MIHEC's vision to build, enhance, and sustain inclusive higher education options for all students with ID across the state. MIHEC is uniquely positioned with expertise in intellectual and developmental disabilities as well as inclusive higher education to lead the way alongside the Office of Higher Education.

# Appendix D:

## Minnesota Office of Higher Education Data Suppression Policy for Student Information

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### Purpose

The purpose of this policy is to ensure the protection of private data on students when releasing summary data about our institutions and students.

Increased attention to education has led to an expansion in the amount of information on students and institutions reported by the Minnesota Office of Higher Education (OHE). Such reports offer a challenge of meeting reporting requirements while also meeting legal requirements to protect each student's personally identifiable information (Family Educational Rights and Privacy Act [FERPA]) (20 U.S.C. § 1232g; 34 CFR Part 99). Recognizing this, subgroup disaggregation of the data may not be published if the results would yield personally identifiable information about an individual student (or if the number of students in a category is insufficient to yield statistically reliable information). States are required to define a minimum number of students in a reporting group or subgroup required to publish results consistent with the protection of personally identifiable information (34 CFR § 200.7).

### Scope

This policy applies to all public reports generated by employees, agents, or contractors of OHE.

### Policy

OHE may release summary data, including aggregate student counts for all groups including those of less than 10. However, OHE may not release any other information regarding the group depending on the sensitive nature of the data.

Other information is defined as information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school (institution) community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty. Other information may include, but is not limited to: gender or sex, gender identity, race/ethnicity, Tribal affiliation, disability, citizenship, income and wages, expected contributions, cumulative debt, and birth date or birthplace information. Other information also includes aid awarded for the following programs, including but not limited to: Postsecondary Child Care Grants, Minnesota Indian Scholarship Program, MN Reconnect, Public Safety Officer Survivor Grant, Teacher Candidate Grants, Grants for Students with Intellectual and Developmental Disabilities, and State Grant.

OHE may suppress other information for aggregate student counts of less than 10 for the following reasons:

- the information could identify an individual, or
- the report will be released to an audience that includes recipients other than individuals to whom OHE may disclose personally identifiable information pursuant to federal or state law.

In addition to suppressing small cells, OHE may:

- Recode categories with values of 95 to 100 percent to greater than or equal to 95 percent ( $\geq 95$  percent), and
- Recode categories with values of 0 to 5 percent to less than or equal to 5 percent ( $\leq 5$  percent).

Unforeseen circumstances, such as a pandemic or natural disaster, may affect the integrity of annually collected data. OHE will consider and decide upon potentially adjusted reporting and suppression strategies in such extraordinary times.

Individuals and organizations to which OHE discloses information will be directed that its re-disclosure to anyone who is not authorized to receive that information under state and/or federal law is prohibited. Disclosure of data by the Minnesota Office of Higher Education is subject to Minnesota Government Data Practices Act (MGDPA, Minnesota Statutes Chapter 13) and the Family Educational Rights and Privacy Act (34 CFR Part 99.31).

Additionally, any use of education records by another state agency, its employees, agents, or contractors is subject to and shall be consistent with applicable provisions of the Family Educational Rights and Privacy Act (FERPA) and the Minnesota Government Data Practices Act (MGDPA) including, but not limited to, FERPA regulations at 34 C.F.R. § 99.32 through 99.35, regarding recordkeeping, re-disclosure, and destruction of education records.

## Definitions

- Personally identifiable information (PII): Data that identifies the individual. For the purposes of education records, PII is defined by federal law as information that includes, but is not limited to a student's name; the name of the student's parent or other family members; the address of the student or student's family; a personal identifier, such as the student's social security number, student number, or biometric record; other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school (institution) community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; and information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.
- Summary Data: Statistical records and reports aggregated from data on individuals in a way that individuals are not identified and from which neither their identities nor any other characteristic that could uniquely identify an individual is ascertainable.



## **Classification of Information**

Pursuant to Minnesota Statutes 2020, section 13.02, subdivision 12 and Minnesota Statutes 2020, section 136A.162, data on students collected and used by the Minnesota Office of Higher Education are private data on individuals, including data on applicants for financial assistance collected and used by the Minnesota Office of Higher Education for student financial aid programs administered by that office.



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