

133 CSR 2. HIGHER EDUCATION FINANCE POLICY

RESPONSE TO COMMENTS

On June 13, 2022, the Higher Education Policy Commission (Commission) commenced a 30-day public comment period to accept written comments on proposed amendments to legislative rule 133 C.S.R. 2, *Higher Education Finance Policy*. One commenter submitted written comments regarding the Commission's proposed revisions. The Commission addresses this comment below.

1. COMMENTER: Marshall University

COMMENT: *The commenter states, "We request that the institutional mission weight process also include the special focus populations and premiums to the extent practical. There may be situations where appropriate data may not be available for certain special focus populations due to decisions made by the institution (e.g., an institution decides to go ACT/SAT test optional). Optimally, these particular weights or include/don't-include settings for the formula can be made in the middle of the 5-year process so such decisions are not punitive to the institution's funding."*

RESPONSE: The rule in its present form provides flexibility for the Chancellor to make certain adjustments to model calculations to ensure that the model itself does not discourage or stifle innovative practices at the institutional level. In the hypothetical case described in the comment, should any institution exercise its discretion to move toward a test-optional admissions policy, benchmarking calculations may be adjusted to better align with a shift in institutional policy. The issue of test-optional admissions will be discussed with and considered by the Funding Formula Advisory Committee at a future meeting to determine if additional clarification to the rule is necessary prior to the five-year review. It is our opinion, however, that no changes are necessary at this time.