

C. WORK-STUDY PROGRAMS

While the purpose is "to stimulate and promote the part-time employment of students, particularly students from low-income families," it significantly limits work-study programs to *full-time students*. This limitation, too, is discriminatory because worthy and otherwise eligible part-time students are disqualified from admission to a college work-study program.

D. MATCHING ON WORK-STUDY PROGRAMS

Until June 30, 1967, the institution was required to contribute 10% of the total fund for the work-study program, the remaining 90% being contributed by the federal government. Thereafter, the matching ratio will be 25%-75%. No overhead is allowed to the institution in the Federal grant for work-study programs unless the work is of a community action type under Title II of the Economic Opportunity Act. In that case, 5% overhead is allowed. The Higher Education Act of 1965 made no changes in these matching requirements. The 25% matching provision is prohibitive for many institutions and the 10% matching should be maintained.

PROPOSAL

The discriminatory features of Title IV should be eliminated and opportunities for scholarships and work-study participation should be accorded to part-time students on a reasonably proportionate formula basis.

Specifically, AUEC respectfully requests that Title IV be amended in the following respects:

1. Recognition of eligibility of part-time students under Title IV for educational opportunity grants and work-study programs on an equitable formula basis reasonably related to full-time attendance.
2. A uniform definition of full-time students (12 or more credits), and part-time students (less than 12 credits but at least 6 credits). The determination of full-time attendance should also be as defined by the institution, if higher than that stated.
3. Freezing of the 10% institutional contribution in college work-study programs and repeal of the 25%-75% escalation.
4. Recognition of tuition-free institutions, on a reasonable formula basis, with respect to institutional matching for educational opportunity grants. The problem arises out of an administrative ruling, a copy of which is attached, denying such recognition by the use of the word "arbitrary." In our judgment, the administrative ruling is contrary to law and the statute should be amended to abrogate the ruling.
5. In addition, earnings from work-study programs to the extent of the institutional share should be included as institutional matching for educational opportunity grants.
6. Adequacy of appropriations for all three Title IV programs.

THE EVIDENCE OF NEED

Summarized below are pertinent statements in writing received by the Legislative Committee of AUEC concerning the proposed amendments to Title IV of the Higher Education Act. Copies of these letters will be furnished upon request.

The summary below contains appropriate excerpts from all the replies received to the questionnaire of the Legislative Committee of AUEC without regard to the position taken. It is evident that the majority are opposed to the present discrimination under Title IV against part-time students.

Dean Clemo of Adelphi University, Garden City, New York, writes in part:

"I would anticipate no trouble at all on the 10% matching should we ever have need to do so but I would anticipate considerable trouble on the 25% matching.

"On the other hand, I could not agree more that evening students (or, rather, part-time students) should not be discriminated against in the receipt of scholarship grants and I would strongly urge a revision of this law."

Director Southouse of the University of Bridgeport, Bridgeport, Connecticut, writes in part:

"In regard to institutional matching problems, I would simply say that the problem is that this institution could not afford to match any grant