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Fair Funding and the Future of Higher Education in Virginia

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EXECUTIVE SUMMARY

In January 2021, the State Council of Higher Education for Virginia (SCHEV) laid out an ambitious plan for Virginia to become the best state for higher education by 2030. The Council's report, *Pathways to Opportunity: The Virginia Plan for Higher Education*, affirmed, as a foundational principle, that higher education "should be equitable, affordable, and transformative."

The Commonwealth has some way to go before it can realize that principle. A state of de facto segregation by income and race exists in Virginia higher education. At some of Virginia's wealthiest public institutions, barely 1 out of ten students come from low-income households and only a quarter of students come from low- and middle-income households, while at Virginia's two public Historically Black Colleges and Universities (HBCUs), more than half the undergrads come from low-income households.

The sources of the unfair distribution of access to higher education and uneven outcomes for those who enroll in the Commonwealth's colleges and universities are manifold, but unfair state funding creates significant drag on Virginia higher education's power to transform lives, communities, and economies. When higher education is inequitable and unaffordable, it cannot be transformative. Not one of the Commonwealth's four-year institutions placed in the top twenty percent among public four-year institutions in a recent ranking of how well colleges and universities increase economic mobility. Four Virginia universities placed in the lowest twenty percent.

Some of Virginia's less affluent universities earn low social mobility rankings because their graduates take much longer, on average, to pay

off the cost of attending. At wealthier institutions, however, the issue is not the return students get on their investment; it is that these elite universities enroll too few students from low-income households. Virginia's current funding of higher education bears little relation to how much institutions increase social mobility. George Mason University is the second-best university in the state for increasing economic mobility, but it receives the smallest amount of funding per student of any four-year college. Christopher Newport University ranks last in the state for social mobility, but it receives the fourth largest sum.

The good news is that the Virginia General Assembly has begun the process of creating a rational funding formula that could correct some profound flaws in the current system. In July 2022, SCHEV released the *Virginia Cost and Funding Need Study Report*. There is much to praise in the conceptual framework, but as the Virginia policymakers take up the report and create Virginia's funding formula it should pay particular attention to two issues.

1. Closing equity gaps based on race/ethnicity, income, region, and age should be placed at the center of all aspects of developing a funding formula.
2. The inclusion of performance-based funding (PBF) in a state funding formula is important for providing incentives to reaching state goals and holding institutions accountable, but PBF needs to be carefully and thoughtfully designed if it is to make higher education equitable, affordable, and transformative.



Worth and genius would...have been sought out from every condition of life, and completely prepared by education for defeating the competition of wealth and birth for public trusts.

- Thomas Jefferson to John Adams, 1813



When Thomas Jefferson joined the Virginia House of Delegates, just months after writing the Declaration of Independence, the first bill he pushed reformed the inheritance laws that concentrated land and wealth in just a few hands and the second would have created free public schools for the cultivation of republican virtues and identification of the most talented students, who would go on to free higher education. These bills – the first passed, the second did not – reflected one of Jefferson’s most deeply held and long abiding beliefs: education should be the antidote to aristocracy. Almost four decades after serving in the House of Delegates, he wrote to John Adams with pride about his lifetime effort to replace an “artificial aristocracy, founded on wealth and birth” with a “natural aristocracy of virtue and talent.”¹ While Jefferson’s vision for higher education in Virginia was deeply flawed in that it extended only to white men, his belief that upward mobility and success in life should not be determined by where you come from or how much you were born with remains the very foundation of the American Dream.

Jefferson believed that education at its best would be meritocratic, free, and necessary to make the Republic stronger. Or, as the 2021 State Council of Higher Education for Virginia (SCHEV) report *Pathways to Opportunity: The Virginia Plan for Higher Education* puts it, higher education “should be equitable, affordable, and transformative.” Those are the guiding principles of the *Virginia Plan for Higher Education*, which charts the course for making Virginia the “best state for higher education by 2030.”² The Virginia Plan is Jeffersonian at heart because it understands that for higher education to be transformative, it must also be equitable and affordable.

The State of Higher Education in the Commonwealth

Jefferson’s vision for higher education in Virginia has not become a reality, thanks to the cost of college and the de facto segregation by income and race that exists in Virginia’s institutions of higher education. When the benefits of higher education mainly go to the children of the highly educated and wealthy, a bachelor’s degree becomes a new form of artificial aristocracy. And that, unfortunately, is the direction Virginia has been heading in for many years now:

- While third of Virginia’s 18–24-year-old residents are Black or Hispanic, enrollment at just 3 of the state’s public four-year institutions meet or exceed that proportion.³
- Black college students are three times more likely to be enrolled in a for-profit institution than their peers were, while Hispanic students are disproportionately enrolled in two-year institutions.⁴
- Virginia is home to five of the eleven worst public colleges and universities in the nation for enrolling low-income students who receive Pell Grants.⁵

Not all Virginia’s public colleges do a poor job of enrolling a racially and socioeconomically diverse student body, however. There is great variation among institutions when it comes to enrollment by



income (see figure 1). At some of Virginia's most prestigious public institutions, barely 1 out of ten undergraduates come from low-income households and only a quarter come from low- and middle-income households combined.⁶

Enrollment by Income Range Category, 2019-2021

Income parameters for a four person household in Virginia.

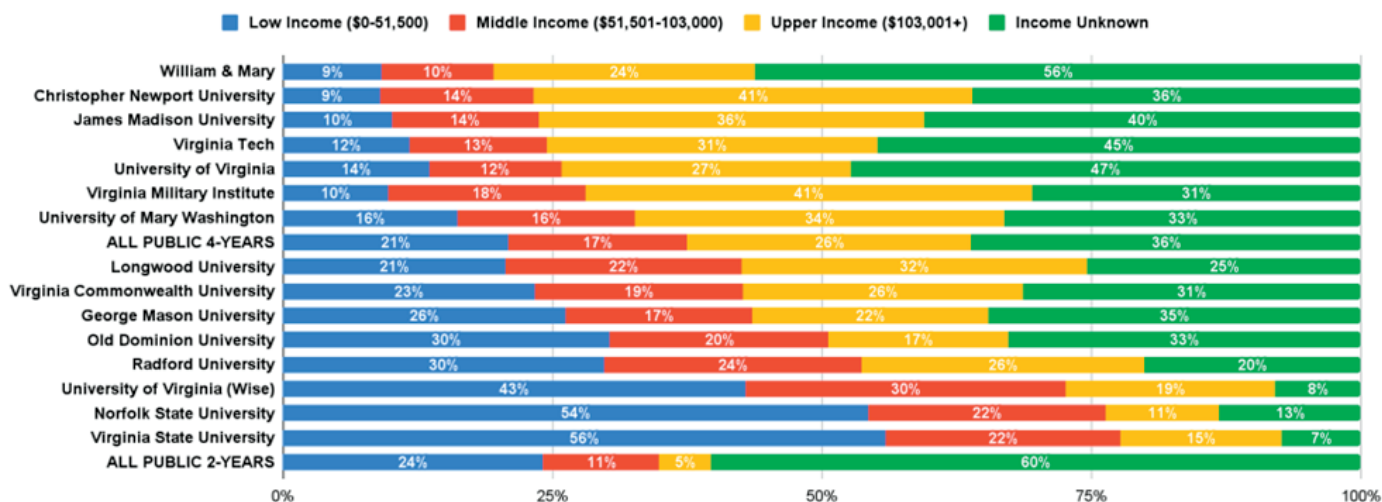


Figure 1

SOURCE: SCHEV

At a handful of universities, however, students from the lower- and middle-class make up the majority of students. At Virginia's two public HBCUs, for instance, more than half the undergrads come from roughly the bottom third of the state by income. For a range of reasons, completion rates at some of these more accessible institutions lag behind their peers who enroll the state's wealthier students. In order to be transformative, college must not only be accessible. It must also be successful.

The Virginia General Assembly recognizes these problems, and *The Virginia Plan for Higher Education* declares its commitment to making higher education serve the interests of everyone in the Commonwealth. The sources of the unfair distribution of access to higher education and uneven outcomes for those who enroll in Virginia are manifold. They include:

- uneven access to a high-quality college preparatory academic program;
- a failure to deliver high quality college and career advising in high school to every student; and
- recruitment and admissions practices, like the use of legacy preferences, a reliance on early decision practices, and over-recruitment from wealthy ZIP codes and private high schools.⁷

While suburban parents wring their hands over how hard it is to get into elite colleges, the reality is that students and families indicate that paying for college is the single biggest barrier to going to college and to graduating.⁸ College is too expensive for too many people. There is no single or simple explanation for why college has come to cost so much in the past twenty years, but one reason is that many states have



disinvested in higher education as colleges and universities have expanded the services they provide and increased spending, too.

The Great Recession led many states to cut higher education expenditures. Due to some increases in funding in recent years, per student funding at two-year colleges in Virginia has finally returned to equivalent, pre-Recession levels, but it still has not caught up across the four-year sector.⁹ When state funding fails to keep up with increased institutional expenditures, the costs are passed onto students and families. Virginia has fallen behind many other states on a range of funding and affordability issues:

- In 2021 Virginia ranked 38th in the nation for appropriations per full-time equivalent (FTE), despite being among the wealthiest states in the U.S.¹⁰
- In 2001, the state covered 77 percent of the total cost of public higher education. In 2019, it covered just 48 percent.¹¹
- Virginia's doctoral institutions have the 7th highest tuition in the nation while comprehensives have the 4th highest.¹²

With higher tuition and fees comes more student debt, which in turn places a financial burden on young Virginians that makes it harder to invest in a home or business. Higher education should drive entrepreneurship, not prevent it. Thirty years ago, not even a third of Virginia's students attending four-year colleges took out loans to pay for college. For almost all of the past decade, half of them have.¹³

What's worse are the huge disparities among universities in the percentage of students who had to borrow to improve their opportunities. Figure Two shows that HBCU students took out student loans at roughly three times the rate as students at UVA and William & Mary.

Where Do Undergrads Borrow to Go to College?

The chart shows the average percentage of fall undergraduates who took out student loans in AYs 2018/9 and 2019/20.

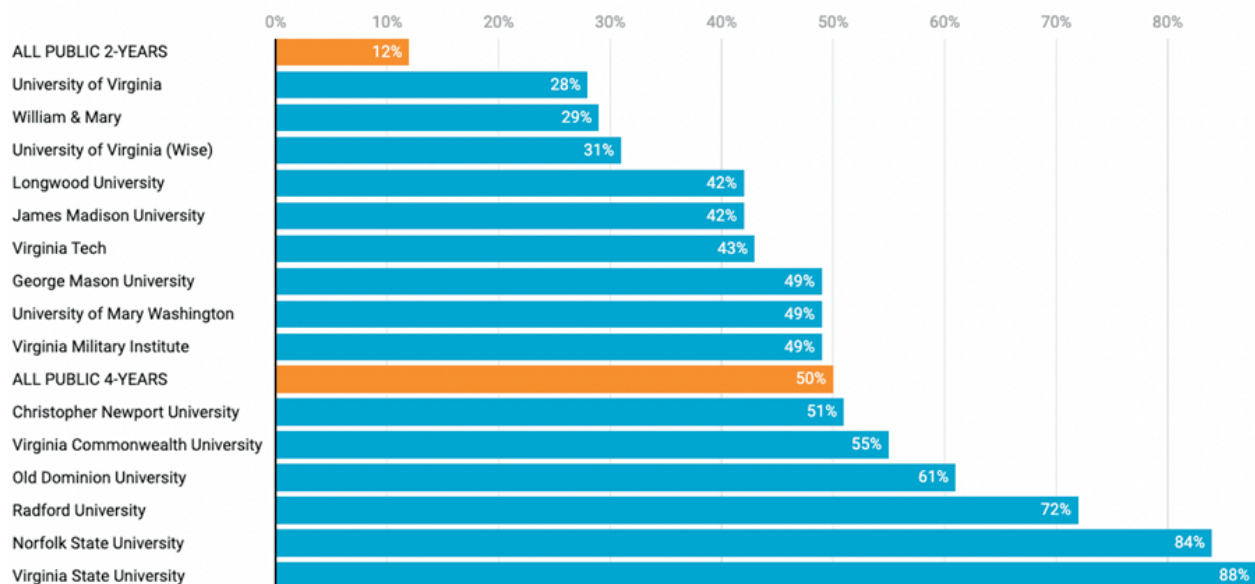


Chart: ERN/PCAPT • Source: SCHEV FA33T • Created with Datawrapper

Figure 2



There are many ways higher education can be transformative, from promoting economic growth through jobs and training to changing the way we think and live through research, but one of the most effective ways is to drive social mobility. Higher education can transform not just individuals' lives but entire families and communities when it leads people into rewarding careers that pay well. When institutions of higher education are not equitable or affordable, however, it makes it harder for them to be transformative.

In a recent ranking of how well universities increase social mobility, not one of the Commonwealth's four-year institutions placed in the top twenty percent among public colleges and universities. Four Virginia universities placed in the bottom quintile (See Figure Three).

Which Virginia Universities Drive Social Mobility?

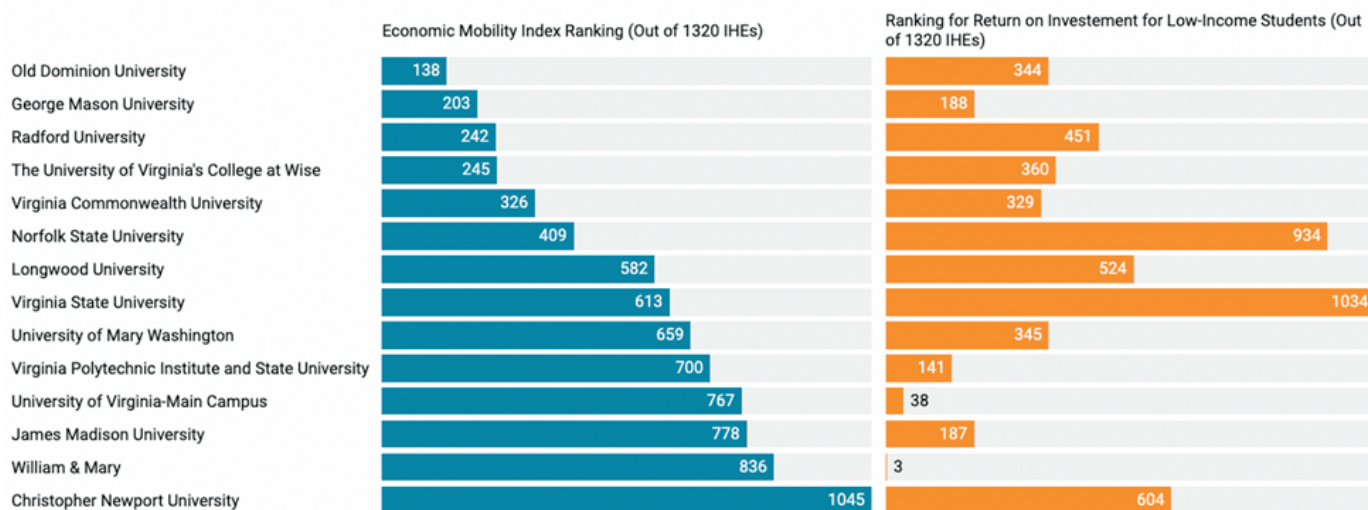


Chart: ERN/PCAPT • Source: Third Way/M. Itzkowitz • Created with Datawrapper

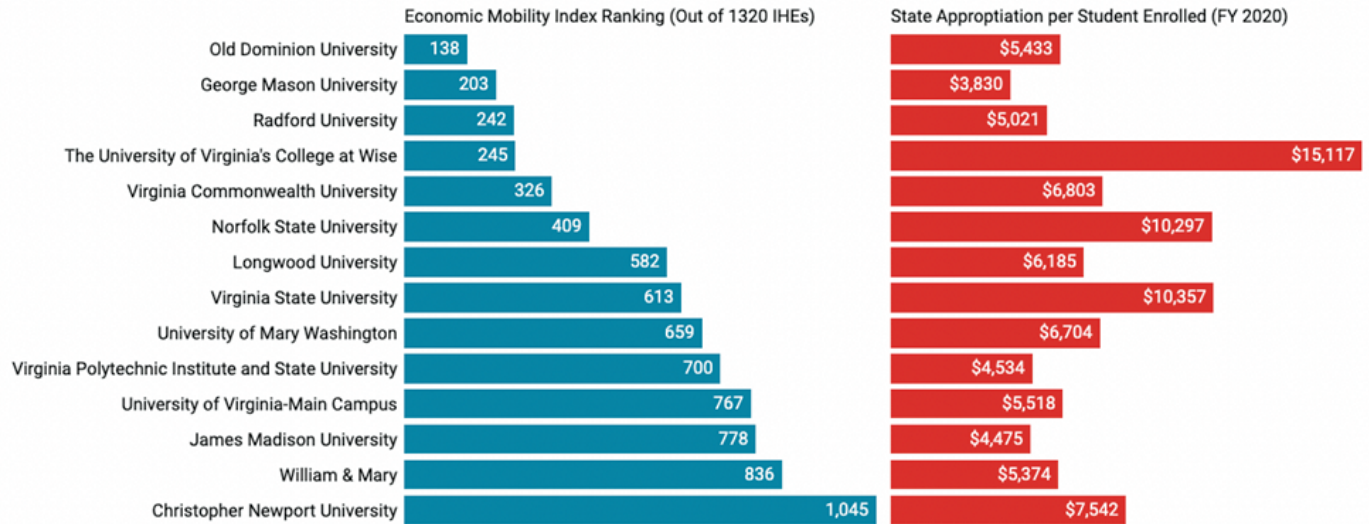
Figure 3

The Economic Mobility Index, created by Mike Itzkowitz and Third Way, measures both the proportion of students from low- and moderate-income households enrolled at colleges and universities and the return those students get in terms of income on their educational investment.¹⁴ Some of Virginia's universities suffer because the return on investment (ROI) is not very high. Norfolk State and Virginia State, for instance, enroll very high percentages of students with Pell Grants, but their graduates take much longer, on average, to pay off the cost of attending. On the other end of the spectrum, institutions like UVA and William & Mary provide a very strong ROI for low-income students but enroll very few students who are low-income. William & Mary actually ranks third in the nation, just behind Stanford and ahead of the entire Ivy League, when it comes to ROI for low-income students, but 835 colleges and universities in the nation rank ahead of it on Economic Mobility.

Virginia's taxpayers could ask about the return on their investment in higher education. By pairing each university's social mobility ranking with the appropriation per student enrolled (see Figure 4), we can see some real mismatches.



Are Taxpayer's Funding Social Mobility in Virginia Higher Ed?



The state appropriation is the sum of the adjusted general fund Educational and General Programs funding (FY 2020) and state financial aid dollars (AY 2020-21). Financial aid is for undergraduate and graduate students. The appropriation per student enrolled is calculated by dividing the total investment by the total headcount of undergraduate and graduate students (AY 2020-21). All data are from SCHEV.

Chart: ERN/PCAPT • Source: Third Way/M. Itzkowitz and SCHEV • Created with Datawrapper

Figure 4

George Mason University is the second-best university in the state for increasing social mobility, but it receives the smallest appropriation per student of any four-year college. Christopher Newport University ranks last in the state for social mobility, but it receives the fourth largest appropriation.

The three universities that receive the largest appropriation per student – UVA-Wise, VSU, and NSU – rank in the second and third quintile nationally for public colleges and universities, which is respectable but raises questions about whether they should be doing more given the size of the investment the state makes in them. We think it is important to understand that investment in context. Those three universities cannot raise the same level of tuition revenue that their wealthier peers in the state can and they enroll a much larger share of first-generation students and students who lack the resources of their wealthier peers, which means that they often need stronger support. Fair funding is not a question of who gets the most revenue from the state but what is the best way to fund every institution to make higher education in Virginia equitable, affordable, and transformative.

The Virginia Cost and Funding Need Study Report

The good news is that Virginia's policy makers are ready to start addressing these funding issues. In 2021, as part of the Virginia Plan, the General Assembly directed SCHEV to study the cost and funding needs of the Commonwealth's public institutions of higher education. In July 2022, SCHEV released the *Virginia Cost and Funding Need Study Report* as a roadmap for making Virginia the best state for higher education by 2030. That effort needs to begin with determining how to fund public higher education fairly so that it can fulfill its mission to be affordable, equitable, and transformative.



There is much to praise in the Cost and Funding Report, including but not limited to the following:

- It calls out “creeping inequities in [higher education] funding.”¹⁵
- It acknowledges the recruitment and revenue advantage that a few universities have, which allows them to charge higher tuition and attract students, particularly nonresidents, who can and will pay the full sticker price for attendance.
 - As seen in figure 1, the majority of undergraduates at William & Mary and almost half of them at the University of Virginia do not even apply for financial aid, which is most likely because they do not expect to get any because they can and will pay the full cost of attendance. As a result, tuition revenue at those institutions accounts for around 80 percent of total educational revenue. Meanwhile, at institutions such as Norfolk State, Virginia State, and UVA-Wise, tuition accounts for less than half.¹⁶
- It acknowledges the unique institutional missions of Virginia’s two- and four-year institutions of higher education at the same time that it recognizes that all institutions need to have common priorities to make higher education “equitable, affordable and transformative.”
- Its conceptual framework includes performance-based funding (PBF) to create incentives linked to state goals for higher education, but only after establishing a baseline funding figure covering fixed and variable costs (e.g., a “frugal” level of administration, maintenance, semester credit hours weighted by audience) and then laying PBF on top of it.

It is important to note that the Cost and Funding Report does not provide the funding formula that Virginia will develop in the next two years. It provides a conceptual framework, so it is not surprising that some aspects of the funding formula are left undeveloped. As state policymakers take the conceptual framework and transform it into a functioning funding model for higher education in Virginia they will need to consider many issues. We call attention to some here.

Fair Funding for Underrepresented Students

The Cost and Funding Report identifies the reduction of equity gaps based on race/ethnicity, income, region, and age as a goal of the Virginia Plan, but it does not say enough about how a funding formula can reduce those gaps. Closing them is vital as Virginia’s high schools continue to grow more racially and ethnically diverse and as the population continues to shift toward urban areas.

The conceptual framework wisely includes weights in its calculation of semester credit hour production to reflect who a university enrolls. An institution that enrolls a larger share of students with less academic preparation, fewer resources, greater demands, or other barriers to graduation gains additional credit for doing so. The creation of these weights is wise, but determining what and how large they will be needs to be carried out with just as much wisdom. The weights given to credit hours earned by underrepresented students should reflect the cost of increasing, implementing, and maintaining student supports to increase degree attainment among underrepresented students. An abundance of research has



shown a range of ways that colleges and universities can boost retention and completion, but these services will increase the cost of higher education.¹⁷ Several studies have also shown that the expense pays off by increasing the return on investment for both students and the state.¹⁸ After all, merely enrolling more students of color, students from rural communities, and adult learners without those students earning a credential not only fails to increase the return on investment in higher education; it can actually turn it negative by saddling a student with debt but no degree.

One possibility for increasing the likelihood of a new funding formula closing equity gaps and increasing the return to students and the state would be to include funding for innovation grants that will help universities and colleges to develop services that will increase retention and completion within underrepresented student populations. In August 2022, the US Department of Education announced the creation of a competitive College Retention and Completion competitive grant, signaling its endorsement an expansion of higher education policy beyond access and affordability, which many policy and advocacy organizations have been calling for.¹⁹ In 2022, the Virginia General Assembly appropriated \$25,250,000 in FY 2023 and FY 2024 (\$25 million of which is for year two) for a competitive grant designed to enhance recruitment and retention of students with Pell Grants at institutions with low rates of enrollment for Pell-eligible students.²⁰

Those grants are more likely to have a greater impact by increasing graduation rates at institutions that already serve students from these communities well, rather than by increasing enrollment at institutions that do not. Why, after all, do universities with billion-dollar endowments need financial support to enroll students at the same level that far less affluent institutions like George Mason and Old Dominion already do? If the General Assembly were to change the provisions of the competitive grant so priority goes to institutions with both higher-than-average Pell enrollment and below-average endowments it would likely see a greater impact than it will with the current priority given to institutions with below-average Pell enrollment. Those wealthy universities should certainly increase their enrollment of low-income students, but not at the expense of providing support for the institutions that are already enrolling them. Affluent universities can afford to shift their institutional priorities and earn back some of the cost of engaging in fairer recruitment and enrollment practices through equity-driven, performance-based funding measures.

Getting Performance-Based Funding Right

More than thirty states now include some form of performance- or outcomes-based funding in their higher education funding.²¹ The motivation for doing so is clear: it provides incentives for institutions to pursue state goals, which typically include boosting “retention, transfer to four-year institutions, credit accumulation, on-time graduation, degree completion in high-demand fields, and graduates’ wages.”²² PBF also provides a form of accountability, since it ostensibly limits the funding for institutions that fail to improve outcomes.

Unfortunately, performance-based funding has thus far had limited effects in improving outcomes



equitably.²³ PBF has proven especially limited in erasing equity gaps associated with underrepresented populations; indeed, in some states there is evidence that PBF has made the gaps larger.²⁴ That does not mean that performance-based funding cannot help close equity gaps and improve outcomes for underrepresented student populations, particularly if they include equity metrics, as many states that employ PBF do. A 2021 report found that “the amount of funding states link to equity metrics is too small to change institutional behavior,” although it did “find some evidence that prioritizing race in equity metrics can improve enrollment among racially minoritized students but only at less-selective institutions.” The authors of the report suggest that these disappointing results might be improved by “increasing the amount of funds linked to equity metrics in an effort to design more equitable PBF systems.” They argue that even with robust incentives to improve equity, PBF is likely not enough to close outcome gaps and “race-conscious efforts to support equitable outcomes” remain necessary to improve “college access and student success.”²⁵

We endorse the inclusion of performance-based funding in the conceptual framework and believe it should be paired with robust equity measures in the final funding formula approved by the General Assembly. We do so, however with the following caveats:

- The amount of funding tied to performance and outcomes needs to be substantial enough to motivate the adjustments needed to reach the state’s goals for making Virginia the best state for higher education by 2030.
- The share of overall funding that comes from PBF may not be as important as the design of the policy is.
 - A review comparing states with high-dosage PBF (greater than 10 percent of funds tied to performance) and low-dosage PBF policies (fewer than 10 percent) found mixed results at best. For instance, high-dosage PBF was associated with an increase in the number of white students earning a bachelor’s degree in under six years, but for underrepresented minorities it was associated with a decrease on the same measure.²⁶
- Given the middling impact of PBF on improving outcomes for underrepresented students, a significantly weighted equity metric for each component in the funding formula’s performance measures could help produce stronger results.
 - It will be important to prevent PBF from motivating institutions to increase their enrollment of wealthier, nonresident students with high test scores at the cost of enrolling underrepresented students.
 - A measure strongly weighting social mobility, which depends on the enrollment, graduation, and earnings of students from low- and middle-income households, could provide a strong check on perverse outcomes.
- Without adequate additional funding, less selective and less wealthy institutions will not be able to make substantial adjustments in strategies to accommodate PBF expectations. Institutions will also need data infrastructure to make these adjustments and track performance metrics internally and in real time. SCHEV could provide this infrastructure for colleges and universities that need to develop it.



- Performance-based funding should lift all boats in Virginia higher education. It should not turn funding into a competition with winners and losers. There should be no losers in Virginia higher education.
 - Joe May, the former chancellor of Dallas College, argues that the problem with PBF is that too often “it’s an ‘allocation’ system rather than a ‘funding’ system. In a ‘funding’ system, if you do more of X, you get more funding accordingly. In an ‘allocation’ system, the total pie is fixed, and colleges compete with each other over the size of the slices. When a performance funding system operates with a fixed total allocation, the colleges are in zero-sum competition with each other. It’s possible that a college with improved outcomes might take a funding cut if it improved less quickly than the average.”²⁷
 - Qualification thresholds make sense on some performance measures, such as a minimum share of Pell enrollment, but they need to be high enough to make most institutions work to get to the threshold and they should not turn a threshold into an artificial ceiling, where a college qualifies for additional funds by enrolling 20 percent Pell and does nothing to go beyond that number.
 - Whenever possible, institutions should be rewarded for growth over proficiency.
- Given the diversity of Virginia’s institutions of higher education, each college and university should be allowed to select one PBF measure to reflect their mission and identity.
 - Equity measures should not be included among the optional measures. It should be no university’s special mission to serve all Virginians. That should be every university’s mission.
 - All components measured in a PBF formula should be disaggregated by race, ethnicity, income, age, gender, first-generation status, and region.
 - Some measures to consider:
 - 4-, 5-, and 6-year completion rates
 - retention rates
 - regional diversity
 - socioeconomic diversity, including but not limited to Pell Grant eligible students
 - transfers from a two-year institution to a four-year institution
 - completion and retention rates for transfer students
 - socioeconomic mobility, measured for students low- and middle-income households, with additional weights for those from low-income households
 - post-graduate success, such as job placement and earnings
- All PBF measures should be subject to institutional and system-wide review every three years at least through 2030. This process should be transparent and include reporting accessible to all Virginians.
- PBF and the entire funding formula should be utilized regardless of state funding levels. Virginia should not consider investments in higher education subject to economic fluctuation.



Conclusion

There is a great deal at stake for Virginia in the development of a funding formula for higher education. After decades of financial neglect and increasingly larger burdens placed on students and their families, the Commonwealth has a chance to correct course. Virginia's institutions of higher education need to adapt to the changing demographics of the state and provide the education and training to ensure that all Virginians can contribute to and benefit from the Commonwealth's economic prosperity and can participate responsibly in its civic life. In a moment where more members of the public are less confident about the value of higher education, Virginia has the chance to reaffirm that it can be equitable, affordable, and transformative. That opportunity depends on the creation of a funding formula that thoughtfully enshrines those values. If the General Assembly and the Governor get the funding formula right, it can not only transform the lives of Virginia's residents and improve their communities but also become a beacon for the rest of the nation.



END NOTES

- ¹ Thomas Jefferson, “[To John Adams](#)” (28 October 1813).
- ² State Council of Higher Education for Virginia, [Pathways to Opportunity: The Virginia Plan for Higher Education](#) (2021).
- ³ James Murphy, Michael Dannenberg, and Katlyn Riggins, [Scratching the Surface: De Facto Racial & Economic Segregation in Virginia Higher Education](#), Education Reform Now (2021).
- ⁴ Scratching the Surface.
- ⁵ Scratching the Surface.
- ⁶ The data for here is for 2020-21 and appears in [SCHEV Higher Ed Data Table E58: Enrollment by Income Range Category](#). Because the data used here are drawn by SCHEV from the federal government’s Free Application for Student Aid (FAFSA), it only reflects students who completed the FAFSA. At four-year colleges and particularly at those with relatively high tuition, some students do not complete the FAFSA because they do not expect to qualify for need-based financial aid and will pay for college themselves. If William & Mary’s share of enrollment from the wealthiest third of Virginians seems surprisingly low, it is likely because so many of its students skipped the FAFSA altogether, knowing that they would pay for college without any financial aid. At community colleges. The share of students with unknown income is higher than at four-year colleges because the cost of attendance is relatively inexpensive, and many students attend part time.
- ⁷ Virginia’s universities use early decision and legacy preferences at the highest rates for public institutions in the nation. Most public universities use neither practice.
- ⁸ [The State of Higher Education 2022 Report](#), Gallup and Lumina Foundation (2022).
- ⁹ The National Center for Higher Education Management Systems (NCHEMS) and the State Council of Higher Education for Virginia (SCHEV), [Virginia Cost and Funding Need Study Report](#) (July 2022).
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- ¹¹ Scratching the Surface.
- ¹² SCHEV, [2021-22 Tuition & Fees Report](#) (2021).
- ¹³ SCHEV, [“FA33T: Trends in the Percentage of Students Enrolled in the Fall who Borrowed”](#) (2022). Borrowing rates dropped in AY 2021-22, but that was likely due to lower enrollment rates associated with COVID-19 among students from low-income households.
- ¹⁴ Michael Itkowitz, [“Out With the Old, In With the New: Rating Higher Ed by Economic Mobility,”](#) Third Way (2022).
- ¹⁵ [Virginia Cost and Funding Need Study: Interim Report](#), The National Center for Higher Education Management Systems and the State Council of Higher Education for Virginia (December 2021).
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- ¹⁸ Kristin Blagg and Erica Blom, “Evaluating the Return on Investment in Higher Education: An Assessment of Individual- and State-Level Returns,” Urban Institute (2018).
- ¹⁹ US Department of Education, Press Release (11 August 2022)
- ²⁰ Virginia Budget, Item 142 #4c, Budget Amendments - HB30 (2022).
- ²¹ Justin Ortagus, Kelly Rosinger, Robert Kelchen, Nick Voorhees, Garam Chu, “A National Analysis of the Impact of Performance-Based Funding on Completion Outcomes among Underserved Students,” InformEd States (2021).
- ²² Kelly Rosinger, Justin Ortagus, Robert Kelchen, Garam Chu, Nick Voorhees, “The Landscape of Performance-Based Funding In 2020,” InformEd States (2021).
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- ²⁴ Monnica Chan, Zachary Mabel, Preeya Pandya Mbekeani, “Incentivizing Equity? The Effects of Performance-Based Funding on Race-Based Gaps in College Completion,” EdWorkingPaper No. 20-270, (2022).
- ²⁵ Kelly Rosinger, Justin Ortagus, Robert Kelchen, Junghee Choi, “Exploring The Impact of Variations in State Performance Funding Policies on College Access,” InformEd States (June 2021).
- ²⁶ Justin Ortagus, Kelly Rosinger, Robert Kelchen, Nick Voorhees, Garam Chu, “A National Analysis of the Impact of Performance-Based Funding on Completion Outcomes among Underserved Students,” InformEd States (2021).
- ²⁷ Quoted in Matt Reed, “SHEEO Wrap-Up,” Inside Higher Ed (12 August 2022).



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