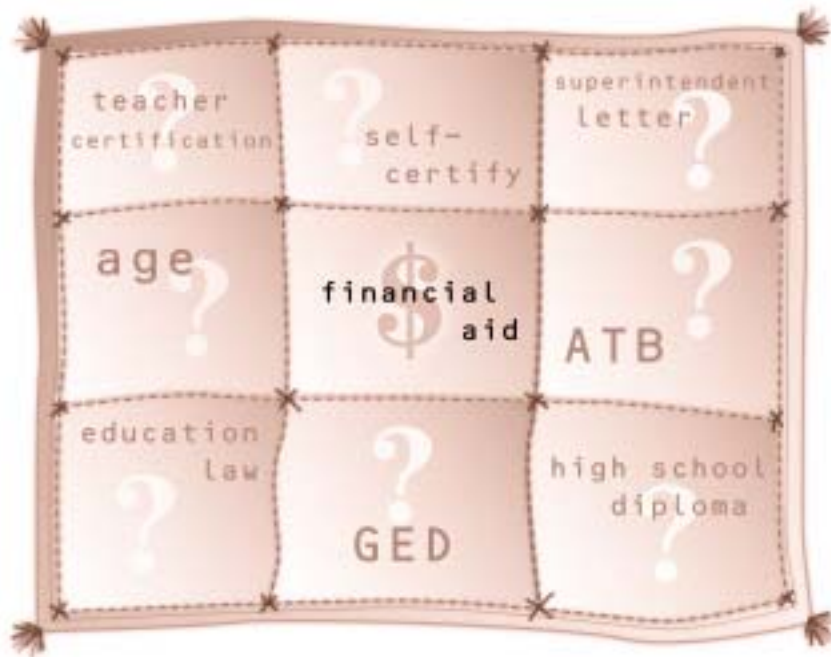


Unintended Admission Consequences



of Federal Aid for Homeschoolers



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Introduction

Because homeschooled students often enter higher education appearing to be traditionally-educated high school students, due to differing state regulations and the accreditation status of different homeschool programs, and because related records are not kept, it is difficult to know how many enter postsecondary education every year. Current estimates of the number of homeschoolers in the United States range from about 900 thousand¹ to 1.7 million². Because this is a large portion of the population an ever-increasing number of colleges and universities are integrating admission guidelines for homeschool students.³ With these guidelines come homeschool federal aid regulations for every college and university that receives Title IV funds and the related consequences homeschooled students face.

In 1998, Congress amended the Higher Education Act (HEA), changing the basis for awarding federal financial aid to homeschoolers.⁴ The new eligibility rules, published in the Federal Register, October, 1999, set July, 2000 as the effective date, but, because the Department of Education did not reflect these changes in the Student Aid Handbook until October, 2002, financial aid officers, generally, did not act on the changes. The new regulations allowed homeschooled students to self-certify that they completed homeschooling and were qualified for federal aid, saying, “Exemption from compulsory attendance requirements under State law,” means that the State does not consider a home-schooled student to be in violation of the State’s truancy laws” and that “Home-schooled students who satisfy the (self-certification) requirements... are eligible to receive title IV, HEA program funds. They are not required to take an ability-to-benefit test.”⁵

Grounds for compulsory attendance and self-certification were defined at greater length:

“Some students finish their home schooling at an age younger than the age of compulsory school attendance in their state or in the state where your school is. Another part of the federal law defines an eligible institution as one that admits as regular students only persons who have a high school diploma or equivalent or persons beyond the compulsory attendance age for the institution’s state. The Department considers a home-schooled student to be beyond the age of compulsory attendance if your school’s state would not require the student to further attend secondary school or continue to be home-schooled.⁶

“A student may self-certify that he has received a high school diploma or GED or that he has completed secondary school through home schooling as defined by state law. If a student indicates on the FAFSA that he has a diploma or GED, your school isn’t required to ask for a copy of the diploma or GED. Because the current FAFSA doesn’t contain a self-certification for homeschoolers, such students may certify that in writing to your school, for example, on an admissions application.

“Under federal law a home-schooled student is not considered to have a high school diploma or equivalent. Nevertheless, such a student is eligible to receive FSA funds if the student’s secondary school education was in a home school that state law treats as a home or private school. Some states issue a secondary school completion credential to homeschoolers. If this is the case in the state where the student was home-schooled, she must obtain this credential in order to be eligible for FSA funds.⁷”

In practice, therefore, the federal aid conditions set for homeschooled students became the ability to self-certify that the home education had been completed according to the laws of the student’s home state, and that the postsecondary institution qualified the student for aid under the compulsory education laws of its home state.

State Regulations

Postsecondary institutions court disaster with admission policies separated from financial aid realities. Fifty different state definitions concern the completion of a homeschool education, affecting the fifty different definitions for self-certification for federal aid purposes, and creating fifty different potential conditions affecting aid and admission policies.

Pennsylvania students must be high school graduates to qualify for state aid. Students in homeschool programs accredited by one of seven agencies, approved by the Pennsylvania Department of Education, or students who submit certification from the appropriate local school official that their education is in compliance with the state home schooling law, are considered graduates of an approved high school for state grant purposes. Superintendents, however, are under no obligation to certify that the home education program is in compliance with Pennsylvania law. Therefore, certification is dependent on cooperative districts.

In New Jersey, case law determines the legality of homeschooling. There is minimal contact with district superintendents who do not have the right to certify completion of homeschooling.

In California, teacher certification is required of one parent, but only if the parent chooses to qualify as a private tutor. If the homeschool registers as a private school under California law—thereby having the same validity as Harvard-Westlake—or enrolls in an independent study program with a private school, no certification is necessary. Therefore, it may be necessary to know the particular legal basis for the individual homeschool.

New York State tries to provide an objective determination of substantial equivalence of homeschool and traditional high school educations. High school diplomas may be awarded only to students enrolled in registered secondary schools. Substantial equivalence, therefore, refers to content, not outcome, since the diplomas are not equivalent. In reality, because state homeschool regulations require that certain standard subjects be addressed at the secondary level, coupled with quarterly progress reports and a single year-end achievement test, equivalence, is about process rather than content, because content is not directly supervised.

In New York, if a student reaches the maximum age for compulsory attendance during the school year, that student’s Individual Home Instruction Plan (IHIP) must cover the full year. However, the district is not required to review the IHIP submitted for the student beyond compulsory attendance age. The student can request that the superintendent of the school district attest to completion of a homeschool education on district letterhead, but the regulations expressly say that the superintendents are under no obligation to do so. Moreover, there are two ages of compulsory attendance. In the five counties of New York City it is seventeen. In every other county in New York it is sixteen.

These differences occur because no single exhaustive source for state homeschool law exists. Even the federal compilation is flawed. Generally, the Home School Legal Defense Association (www.hslda.org) and the National Home Education Network (www.nhen.org) are good sources, but no national homeschool authority exists because no comprehensive national homeschool organization exists.

A Short History

Chris Klicka, of the Home School Legal Defense Association, the most politically effective homeschool organization to date, drafted the Higher Education Act (HEA) amendment that changed federal aid for homeschoolers. Prior to this, homeschool students needed a GED or an Ability to Benefit Test to qualify for federal aid and, depending on institutional policy, SAT I and SAT II tests to qualify for admission. However, in the documents accompanying the financial aid amendment, the House Committee on Labor and Human Resources stated that colleges and universities should have not overly legalistic and overly burdensome admission policies, saying:

“The Committee is aware that many colleges and universities now require applicants from non-public, private, or non-traditional secondary programs (including home schools) to submit scores from additional standardized tests... (GED or... SAT II) in lieu of a transcript/diploma from an accredited high school. Historically... the SAT II was not designed for, and until recently was not used to determine college admissions. Given that standardized test scores (SAT and ACT) and portfolio or performance based assessments may also provide a sound basis for an admission decision regarding these students, the Committee recommends that colleges and universities consider using these assessments for applicants educated in non-public, private, and non-traditional programs rather than requiring them to undergo additional types of standardized testing. Requiring additional testing only of students educated in these settings could reasonably be seen as discriminatory...”⁸

“In a related area, the committee has heard concerns that some institutions of higher education have established unnecessarily burdensome admissions standards for graduates of nonpublic, private and nontraditional educational programs. Again, the setting of admissions standards is the responsibility of institutions themselves. However, the committee encourages institutions that receive Federal funds to make every effort to evaluate and treat applicants from nonpublic, private and nontraditional educational programs fairly and in a nondiscriminatory manner in determining requirements for admission.”⁹

Several discussions about the new (but not yet effective) regulations took place in February of 2000 on FINAID-L, the financial aid administrator’s elist. Chris Klicka argued one view of the impact on admission in a letter to Greg Becher, a director of financial aid at a college in California. In it, Mr. Klicka linked the compulsory age of attendance and college admission eligibility.

“Furthermore, it is ludicrous to think that Congress would allow home schoolers, regardless of age, to obtain financial aid for college based on obtaining a self-certified home school high school diploma if it did not also intend to allow their admittance into the college on this basis... it is clear that Congress intended to officially recognize high school diplomas earned by home school graduates.

“Finally, any students, of any age, who have graduated from any high school—whether public, non-public, or home school—are outside the compulsory attendance requirements imposed by their state statutes. Home school graduates need only to demonstrate that they have successfully completed a secondary school education in a home school setting and have met state law requirements. No college may refuse admittance based on the argument that these graduates are under compulsory attendance age.”¹⁰

Michael Goldstein, then sent a message to FINAID-L pointing out that verification of the state-compliance of home-schooled students was an institutional responsibility. “There remains an obligation on the part of the student aid administrator to reasonably ascertain that the [home-schooled] student has complied with either option... although that does not seem to be a pre-requisite to admission and awarding aid.”¹¹

Mr. Becher responded, “...the [United States] Department of Education allows a student to ‘self-certify’ his compliance with state law in the same way that a high school graduate or GED recipient may.

“So the only time a college ought to require a GED or state proficiency test or ability-to-benefit test of a home-schooled student is if information has come to light that indicates the student was not in compliance with state truancy laws in the manner of his home education.

“...it would clearly be discriminatory for a college to allow some high school students to self-certify that they have a high school diploma or its recognized equivalent (e.g. GED) and then require other students (home-schooled students) to produce additional evidence that they have a recognized equivalent, especially given that the Department of Education specifically wrote... that home-schooled students may self-certify...”

“Normally, there should be no need for colleges to query each state regarding individual state laws and how they apply to home schools, just as you are not required to query each state regarding how they approve high schools. The student’s self certification is sufficient.”¹²

Mr. Goldstein responded, “I am not questioning the self-certification. But most institutions require that a student ultimately provide a high school transcript, and one who cannot is terminated from enrollment if that is a requirement for admission, self-certification or not. The same sort of test: verification that the self-certification is correct, is no different

for home-schooled students. Self-certification is not a substitute for accuracy, and if an institution has reason to believe the self-certification is incorrect, REGARDLESS of the basis for admission, they need to deal with that issue.”¹³ [Emphasis Mr. Goldstein]

Subsequently, the discussion wound down on FINAID-L, but it had highlighted the concerns about institutional responsibility to verify self-certification, about compulsory age requirements, and about Mr. Klicka’s assertion that the federal government implicitly recognized the validity of homeschool diplomas in passing the aid amendment.

More than two years passed and, on April 19, 2002, Eric H. Jaso, deputy general counsel of the United States Dept of Education, responding to inquiries from Chris Klicka, sent him a letter to clarify the now more than two-years-old federal regulation that was still to appear in the Student Aid Handbook. Mr. Jaso’s letter, which Mr. Klicka released publicly, said in part:

“We therefore wish to clarify the circumstances under which home schooled students, including students who complete their home school curriculum before reaching the minimum age of compulsory education, can properly be admitted to a post-secondary institution participating in Title IV programs, and the impact of that admission on the student’s and the institution’s eligibility to participate in the federal student aid programs. We consider a home schooled student to be beyond the age of compulsory attendance if the State where a postsecondary institution is located would not consider that student truant once he completes a home school program; in other words, the State would not require that student to further attend secondary school or continue to be home schooled after completing a secondary curriculum.

“Finally, we note that home schooled students may self-certify their completion of a secondary school curriculum, just as high school graduates may self-certify their receipt of a diploma. Home schooled students need *not* obtain a State certification of home school completion unless the law of the State in which they completed their home schooling provides for the issuance of such a certification... Home schooled Students from such States may self-certify their receipt of such certifications. Because the current FAFSA does not provide a “check box” for self-certification of home school completion, we expect postsecondary institutions to accept such self-certifications in application documents, in a letter, or in some other appropriate record.” [Italics Mr. Jaso]

On May 29, 2002, Mr. Klicka’s office posted a long email to FINAID-L that restated Mr. Jaso’s points (generally unknown until this post). Mr. Klicka seemed to imply that the change in aid regulations required a change in the admission for homeschooled students based on implied federal recognition of the validity of home school diplomas. The National

Association for College Admission Counseling (NACAC) became concerned about the impact that some of the Department’s language might have on the admission policies of states and institutions—policies that were not under the Department’s regulatory scope. While NACAC welcomed the assurance given to institutions that they would not lose federal financial aid over the admission of homeschooled students who fall outside the HEA’s scope of “traditional” (i.e., under the age of compulsory attendance) completers of secondary education, it was concerned whether the Department’s guidance was to be considered more broadly. NACAC contacted the Office of the General Counsel, which replied that the regulations concerned financial aid only, particularly relating to the issue of self-certification.¹⁴

Unintended Consequences: “Undocumentable” Students

Postsecondary institutions need to have consistent and well-stated admission and aid policies and procedures. Unfortunately, the attempt to reduce the admission and aid burden placed on homeschooled students may actually result in worse burdens for some. As Mr. Becher said in February of 2000, “In some states, if you are a home-schooled student it can be a lengthy process to document that you are in compliance with the state’s truancy laws. It can be much more difficult than simply sending a copy of a high school transcript with a graduation date printed on it. Depending on state laws you may have to document various permissions granted by the local school administrator or the school board, or you may have to provide attendance logs for four years, or you may have to provide evidence that you filed the proper affidavit with the state even though the state doesn’t have the manpower (or the will) to acknowledge the state’s receipt of the affidavit.”¹⁵

How do district superintendents or state departments of education respond to multiple post-secondary requests for the certification documentation of a multiple number of applicants? In fact, how do most states know the homeschooled student “graduated?” And, what if the student finishes in June? Does the state certify in August when the district staff returns to the office, months after institutional financial aid has been exhausted in the postsecondary institution?

There is a further difficulty in the federal legislation and regulation as written. A student should be required to homeschool for the last year prior to receiving aid to ensure against system manipulation. For instance, under New York regulations, a failing high school student can withdraw from high school in May of senior year, file an intent to homeschool, and finish homeschool a month later and be qualified for federal aid.

Unintended Consequences: New York State's Response

The New York State Education Department's (SED) regulations, governing who qualifies for financial aid, are 30 or more years old. They were written for different times and circumstances. On October 11, 2002, after the new federal aid regulations were published in the Student Aid Handbook, Johanna Duncan-Poitier, deputy commissioner, Office of Higher Education of the State Education Department (SED), sent a memo to the Chief Executive Officers of New York State Degree-Granting Institutions. Its intent was to clarify what was needed to pass New York State financial aid audits in light of the changed federal regulations. But it also had a chilling impact on the transition to higher education of homeschooled students, especially into private colleges.¹⁶

What is acceptable documentation of high school graduation?

"Documentation is required; *students cannot self-report*. Although self-reporting may be acceptable for federal Title IV financial aid, Education Law specifies that a student must have a "certificate" of high school completion or the equivalent of such certificate. This requirement is interpreted to mean that the institution must maintain some physical evidence in the student's file... [Italics Duncan-Poitier]

Can prior college credits be accepted in lieu of a high school diploma or GED?

"Section 100.7 of the Commissioner's Regulations provides that a student can receive a high school equivalency diploma (GED) when the student has completed 24 college credits as a recognized candidate for a degree at an approved institution. If a student never completed high school or is otherwise unable to document high school completion, a college can admit a student who has completed 24 college credits as the equivalent of having the GED for TAP¹⁷ purposes, providing the credits satisfy the appropriate course distribution requirements... Such students must apply for and receive the GED before being awarded a degree...

How should homeschooled students be handled?

"Home schooled students cannot receive a high school diploma. Only public schools or registered nonpublic schools are permitted by law and regulation to issue diplomas. *Self-reporting of home schooling is not acceptable for financial aid purposes*. To establish eligibility for State student aid, the following options are available to a home schooled student:

- obtain a letter from local school district officials confirming that the student has received an education 'substantially equivalent' to instruction given to students graduating high school in the public schools;
- take and pass the GED test; or
- achieve a satisfactory score on an ability-to-benefit test approved by the U.S. Secretary of Education."¹⁸ [Italics Duncan-Poitier]

Unintended Consequences: State University of New York's Response

Even though the City University of New York for years has had an admission policy that denies admission without a GED or high school diploma, the State University (SUNY) has had a policy which allowed students without diploma or GED to attend community colleges as non-matriculants, awarding them a GED after they passed 24 credits. In 2000, this was changed to 24 credits in a core curriculum. Unfortunately, the core requirements don't fit into most associate degree programs so many students must graduate with more credits than SUNY four-year schools will accept. Moreover, over the years, the 24-credit policy had not been administered evenly and, by 2000, there were graduates holding associates' degrees who had produced neither high school diploma nor GED. Some four-year SUNY institutions were matriculating home-schooled students as freshmen.

On October 10, 2002, one week after the federal regulations were published in the Student Aid Handbook, Dona S. Bulluck of the SUNY Office of University Counsel released a memorandum to the SUNY Community College Chief Student Affairs Officers. It said in part:

"...Education Law... has been interpreted to mean that community college applicants must possess a high school diploma or its equivalent. The SED has determined that there are only two acceptable alternatives to a high school diploma. The first is a GED certificate. The second relates to home-schooled students, who must submit a letter from the superintendent of the school district within which the student resides, stating that the student's home instruction is substantially equivalent to the instruction offered by that student's local high school. Please note that the ability-to-benefit test is not accepted by SED as an alternative to a high school diploma and may not be used as such.

"Education Law... has been interpreted to convey that a high school diploma or its equivalent is required for admission into a program leading to a degree or certificate.

"There appears to be confusion about the ability-to-benefit test and its appropriate use. ...the ability-to-benefit test... establish[s] eligibility for financial aid, which is not the same as meeting requirements for admission.

"Some of you stated that when a student enrolls in a 24-credit hour program (in lieu of a GED), you have adopted a practice of simultaneous enrollment. You enroll the student in both the 24-credit hour program and a degree or certificate program at the same time ...However, if a high school diploma or its equivalent is required for matriculation... then simultaneous enrollment appears to violate an institution's admissions policy for matriculation."¹⁹ [Emphasis Bulluck]

Unintended Consequences: New York Students

The positions of the State Education Department and the State University, in response to the change in federal regulations, were driven in large measure because of the huge financial exposure New York State has under its Tuition Assistance Plan (TAP grant) program open to New York residents attending postsecondary education in New York. Annually, \$750,000,000 millions are distributed. State educational law requires qualification standards for TAP awards by statute. Students cannot self-certify for TAP. At the minimum, an ABT is required.

Nevertheless, the responses in October of 2002 to the updated Student Aid Manual create huge confusion and upset in homeschooling circles and in postsecondary education in New York. In private institutions in New York State, one can matriculate without a GED or high school diploma if the admission staff believes the student can succeed and benefit from the education. However, under the interim regulations, the same student cannot receive a bachelor's degree without first obtaining a valid high school diploma or GED, or producing a letter from the district superintendent attesting to the completion of the homeschool program.²⁰ This, generally, was not enforced until 2002 when a graduating senior at NYU, with a doctoral fellowship to Harvard, was told a week before graduation that he needed a GED. As a New Hampshire homeschooled student, he had enrolled in NYU without a valid high school diploma or a GED and New Hampshire rules do not provide for superintendent's letters. NYU had to get a waiver from the SED to award the student a GED based on NYU coursework (rather than on the more than 24 college credits the student had taken while in homeschool—regarded as dual enrollment). The student received his B.S. and went on to Harvard.

Increasingly, homeschool students in New York are finding this graduation requirement becoming being enforced (though not by State Ed. Dept., which has no enforcement arm) through increased postsecondary awareness of the rule. Homeschoolers suspect the pressure for it is coming in response to the change in the federal financial aid regulations and the impact that relaxed admission and aid standards for homeschoolers might have, politically, in a state wed to high-stakes testing and high school failure. There have even been incidents of four-year colleges requiring proof of GED from transfer students who hold valid associate's degrees.²¹

The Home School Legal Defense Association filed suit on October 2, 2003 (one year to the day after the new federal aid regulations were published in the Student Aid Handbook) in federal court on behalf of Paul Owens, a homeschooled fourth-semester student pursuing an associate's degree in marketing

at Monroe Community College (MCC) in Rochester, New York. MCC notified the student that his matriculated status had been revoked because he didn't graduate from an accredited high school, nor have a GED or superintendent's letter, nor did he take the core curriculum leading to a GED.²²

The current New York State Education Department (SED) regulations enabling homeschool are found in 100.10, in the section on elementary and secondary schools. The regulations governing postsecondary aid and admission are administered under the higher education section. In effect, by requiring district superintendents to sign off on a homeschool education, the higher education section is requiring something of district superintendents that 100.10 says they are not obliged to do. Specifically, 100.10 does not require a district to review the IHIP submitted for a student beyond compulsory attendance age. Yet the higher education section requires it for the college application of a homeschooled student who doesn't wish to submit a GED, and is beyond age compulsory attendance.

The situation gets even more complicated for colleges or universities with campuses in different counties, such as Pace University, located in New York City and Westchester County. With different ages of compulsory attendance, coupled with the equivalency or letter from the superintendent, admission and aid outcomes for the same student technically can be different on different campuses. In addition, differing regulatory outcomes can be possible for students from differing states applying both to SUNY and New York State private schools.

Conclusion

One of the laudatory goals of the HEA amendment was to smooth the transition to college process facing homeschoolers. The legislation appears to have made it easier for most to get financial aid. The difficulties facing less-fortunate homeschoolers are wide-spread. New York is probably the worst-case scenario in the country, but, because New York is the home of one of the two most comprehensive public systems of higher education in the country, as well as the home of an extremely large number of private postsecondary institutions, what occurs in New York affects homeschool applicants nationally.

Three proposals are before the New York State Board of Regents that step beyond the GED and the high school diploma's attempt to regularize postsecondary graduation inconsistencies for homeschoolers. These could be adopted as soon as September of 2004. Postsecondary institutions could grant degrees to homeschooled students beyond compulsory school age (1) who are in receipt of a letter from

their superintendent documenting equivalency of instruction to a high school program (but still there will be no change in section 100.10 requiring the superintendent to write a letter if equivalency has been attained); (2) who pass five NYS Regents examinations or approved alternatives; or (3) who complete 24 semester-hours of Regents specified distributed college coursework.

Another proposal before the Regents, that seems likely to be adopted, is that New York students under compulsory age limits can attend college full-time (defined as 12 credits) as part of their homeschooling if the student's Individual Home Instruction Plan (IHIP) states the name of the postsecondary institution and the courses to be covered. The IHIP then needs to be approved by the district superintendent.

If the proposed changes governing the awarding of baccalaureate degrees are adopted, then the State University system will follow suite because applicable educational statutes or SED regulations govern its policies. The proposed

Regents changes affect admission and graduation. They do not affect state aid, which will continue to be controlled by statute and will not allow self-certification for aid, and which will still require superintendent's letters, GED or ATB for state aid. In New York private institutions and in SUNY we may yet see the anomaly of matriculated students receiving federal aid but no state aid until the Regents distributed 24 credits are reached.²³

NACAC and the state and regional admission associations need to assume more leadership in addressing the financial aid and admission issues facing homeschooled applicants and institutions. Currently, our knowledge is like a patchwork quilt. In addition, with potentially 400,000 homeschooled applicants to higher education over the next ten years, we need some serious research on fit, retention and debt to fulfill "our responsibility as financial aid administrators and admission directors to ensure legal compliance [and,]... be... not unduly burdensome to our students."²⁴

Footnotes

1 United States Department of Education telephone survey

2 Dr. Brian Ray of the National Homeschool Research Institute

3 NACAC Admission Trend Surveys

4 Pub. L. No. 105-244 amending 20 U.S.C. 1091(d)

5 Department of Education Student Assistance General Provision, Part Sec. 484(d), 34 Code of Federal Regulations 668.32(e))

6 Student Aid Handbook 2002-2003, Vol. 1, Student Eligibility, Academic Qualifications p. 1-5, published Oct. 3, 2002

7 Op.Cit. p. 1-4

8 Committee on Labor and Human Resources, 1998. Pub. L. No. 105-244 (Reauthorization of the HEA).

9 IBID

10 A letter from Chris Klicka, Esq., to Greg Becher, posted with permission to the FINAID-L email list, 11 February, 2000

11 Michael B. Goldstein, Esq., Dow, Lohnes & Albertson, pllc 1200 New Hampshire Avenue, N.W. Washington, DC 20036, posted to the FINAID-L email list February 11-15, 2000

12 Greg Becher, 15 February, 2000 on FINAID-L

13 15 February, 2000, Michael B. Goldstein, Esq., to FINAID-L

14 Private communications with David Hawkins, Director of Public Policy, National Association for College Admission Counseling, June 4 & 6, 2002

15 Greg Becher, 17 February, 2000 on FINAID-L

16 The public colleges and universities in the SUNY system are not audited individually.

17 Tuition Assistance Plan – New York's need-based financial aid grant.

18 Memorandum dated 10/11/2002 from Johanna Duncan-Poitier, Deputy Commissioner Office of Higher Education and Office of the Professions, the State Education Department to Chief Executive Officers of New York State Degree-Granting Institutions

19 Memorandum dated 10/10/2002 from Dona S. Bulluck of The State University of New York Office of University Counsel to Community College Chief Student Affairs Officers

20 New York State Education Department: Chapter 1 of Title 8 of the Official Compilation of Codes, Section 3.47 - Requirements for Degrees

21 The president of New York State LEAH, the largest homeschooling organization in the state, stated in a public email that Syracuse University has asked homeschool graduates of the local community college to produce a GED or letter from the superintendent before admitting them as juniors.

22 The MCC press release said that it was enforcing a SED regulation, "..... which it has no control over." The financial aid director of another community college said to me that community colleges were caught in the middle and were "cannon fodder." He also said that the homeschooled students on his campus have always been superior.

23 This doesn't bode well for New York. Already, on homeschool list-serves, postsecondary NY has the reputation as unfriendly to homeschoolers. NY homeschoolers (and families) are going elsewhere, and homeschoolers are shying away from NY for undergraduate studies. It's the beginning of a negative flow of students in this niche, which may be hard to reverse.

24 Greg Becher, 18 February, 2000 on FINAID-L