

SOUTH DAKOTA BOARD OF REGENTS

Full Board

AGENDA ITEM: 15

DATE: August 14, 2014

SUBJECT: Financial Aid in the Regental System

This analysis examines recent financial aid data from the SDBOR system in an effort to assess the scope and depth of financial aid coverage in the Regental system.

RECOMMENDED ACTION OF THE EXECUTIVE DIRECTOR

Information only.



*** Special Data Analysis ***

Financial Aid in the Regental System

To what extent are Regental students able to draw on sources of financial aid – such as scholarships, grants, and loans – that help to offset the costs of attending college? Even though recent analyses have suggested that college students in South Dakota tend to experience relatively modest debt loads and low loan default rates, it is no less important that the adequacy of financial aid in the Regental system be evaluated by policymakers.¹ This analysis examines recent financial aid data from the SDBOR system in an effort to assess the scope and depth of financial aid coverage in the Regental system.

Part I: Institution-Level Data

In the current era of declining high school completions, colleges and universities are forced to compete regionally or even nationally for new students. In this context, pricing emerges as a crucial consideration for prospective students. Yet comparisons of institutions' pricing structures can be analytically awkward (for students, researchers, and policymakers alike) due to the variety of ways college costs can be defined and marketed. A dizzying array of jargon – terms like “sticker price,” “net price,” “flat price,” “discounting,” and “total cost of attendance” – can make college price comparisons somewhat unwieldy.

The concept of “average net price” offers one standard metric for evaluating college costs across institutions. This definition reflects the average amount actually paid by students, calculated as the total cost of attendance (the amount paid for tuition, fees, books, supplies, room, and board) minus grant and scholarship aid. All postsecondary institutions are required to submit average net price data to USDOE as a requirement of participating in federal financial aid programs. The concept of net price also figures prominently in colleges' “net price calculators,” which are web-based cost estimation tools offered by all colleges and universities as mandated by federal law.² Overall, “average net price” offers a summative statement of relative cost for the average student.

Table 1a (next page) presents IPEDS college pricing data – including “average net price” figures – for South Dakota and each of its neighboring states. Figures in this table reflect statewide averages for all public (non-tribal) four-year postsecondary institutions during 2011-12.³

Table 1a shows that while South Dakota institutions currently have one of the highest *average total price* values in the region (first column; includes tuition and fees, books and supplies, and room and board), they also offer the lowest *average grant aid* (second column; includes grant and scholarship aid from federal, state, local, and institutional sources). Combined, these contrasting conditions leave South Dakota with the second-highest *average net price* in the Upper Midwest region (only \$157 behind Iowa).

¹ See SDBOR's annual [Student Debt in South Dakota](#) and [Federal Student Loan Default Rates](#) special reports.

² For an example of a net price calculator, see <http://www.sdstate.edu/admissions/financing/calculator.cfm> (SDSU).

³ For all data in this section, *average total price* reflects charges assessed to in-state students only, while *average grant aid* refers to aid received by all students. Consequently, *average net price* is calculated independently, and is not the difference between *average total price* and *average grant aid*. Statewide averages are unweighted.

Table 1a. Price and Aid Data, 2011-12, States

	<i>Average Total Price</i>	<i>Average Grant Aid</i>	<i>Average Net Price</i>
<i>Iowa</i>	\$19,506	\$6,453	\$14,035
<i>South Dakota</i>	\$18,137	\$3,947	\$13,878
<i>Minnesota</i>	\$20,010	\$5,688	\$13,799
<i>North Dakota</i>	\$17,007	\$4,291	\$12,474
<i>Montana</i>	\$17,270	\$5,374	\$11,803
<i>Wyoming</i>	\$17,174	\$6,521	\$11,203
<i>Nebraska</i>	\$16,929	\$5,406	\$11,111
<i>All States</i>	\$18,207	\$5,193	\$12,839

IPEDS Definitions:**Total Price**

Cost of attendance for full-time, first-time degree/certificate seeking in-state undergraduate students living on-campus. Includes in-state tuition and fees, books and supplies, on-campus room and board, and other on-campus expenses.

Grant Aid

Average amount of grant aid received by full-time, first-time degree/certificate-seeking undergraduate students (grants/educational assistance funds). Includes federal, state and local government grants and institutional grants.

Net Price

Average net price for full-time, first-time degree/certificate-seeking undergraduates paying the in-state tuition rate who received grant or scholarship aid from federal, state or local governments, or the institution. Other sources of grant aid are excluded. Aid received anytime during the full aid year is included. Average net price is generated by subtracting the average amount of federal, state or local government, or institutional grant and scholarship aid from the total cost of attendance. Total cost of attendance is the sum of published tuition and required fees (lower of in-district or in-state), books and supplies and the weighted average room and board and other expenses.

Source: IPEDS

Table 1b reveals another disquieting finding. Since 2008-09, South Dakota has recorded the largest increase (20.3 percent) in *average net price* (for in-state students) among all analyzed states. This growth figure is nearly twice the regional average of 11.8 percent. The roots of this trend are easy to spot: from 2008-09 to the present, *average total price* climbed at a higher rate (19.2 percent) in South Dakota than in any other state, while *average grant aid* rose by the smallest rate (4.5 percent).

Table 1b. Percent Change, 2008-09 to 2011-12

	<i>Average Total Price</i>	<i>Average Grant Aid</i>	<i>Average Net Price</i>
<i>South Dakota</i>	19.2%	4.5%	20.3%
<i>Wyoming</i>	9.9%	13.4%	15.8%
<i>Minnesota</i>	13.8%	17.9%	15.1%
<i>Nebraska</i>	16.1%	20.6%	12.4%
<i>Montana</i>	7.8%	5.5%	7.0%
<i>Iowa</i>	8.8%	20.9%	5.8%
<i>North Dakota</i>	14.2%	41.1%	4.3%
<i>All States</i>	13.5%	16.9%	11.8%

Source: IPEDS

Table 2 displays price and aid data at the institution level. For each Regental university, a comparison line shows analogous data for all similar institutions – by Carnegie classification – in neighboring states. Specifically, BHSU, DSU, and NSU are compared to baccalaureate and master’s institutions in neighboring states, while SDSMT, SDSU, and USD are compared to doctoral and research institutions.

These data indicate that Regental universities awarded from \$900 to \$1,700 less in *average grant aid* than did comparison institutions in 2011-12, and that these differences tended to overmatch any starting advantage the Regental universities may have had with respect to *average total price*. Overall, data indicate that Regental institutions tend to show higher *average net price* figures than do comparable institutions in neighboring states. For those with a lower *average net price* (DSU and SDSU), the differences are near zero.

Table 2. Price and Aid Data, 2011-12, Institutions

	<i>Average Total Price</i>	<i>Average Grant Aid</i>	<i>Average Net Price</i>
<i>Black Hills State University</i>	\$18,027	\$3,872	\$14,028
<i>Neighboring States</i>	\$17,551	\$5,058	\$12,316
<i>Difference</i>	+\$476	-\$1,186	+\$1,712
<i>Dakota State University</i>	\$16,015	\$3,554	\$12,142
<i>Neighboring States</i>	\$17,551	\$5,058	\$12,316
<i>Difference</i>	-\$1,536	-\$1,504	-\$174
<i>Northern State University</i>	\$17,710	\$4,156	\$13,006
<i>Neighboring States</i>	\$17,551	\$5,058	\$12,316
<i>Difference</i>	+\$159	-\$902	+\$690
<i>SD School of Mines & Tech</i>	\$20,430	\$3,871	\$15,682
<i>Neighboring States</i>	\$19,467	\$5,465	\$13,883
<i>Difference</i>	+\$963	-\$1,594	+\$1,799
<i>South Dakota State University</i>	\$17,787	\$3,788	\$13,753
<i>Neighboring States</i>	\$19,467	\$5,465	\$13,883
<i>Difference</i>	-\$1,680	-\$1,677	-\$130
<i>University of South Dakota</i>	\$18,852	\$4,439	\$14,658
<i>Neighboring States</i>	\$19,467	\$5,465	\$13,883
<i>Difference</i>	-\$615	-\$1,026	+\$775

IPEDS Definitions:

Total Price

Cost of attendance for full-time, first-time degree/certificate seeking in-state undergraduate students living on-campus. Includes in-state tuition and fees, books and supplies, on-campus room and board, and other on-campus expenses.

Grant Aid

Average amount of grant aid received by full-time, first-time degree/certificate-seeking undergraduate students (grants/educational assistance funds). Includes federal, state and local government grants and institutional grants.

Net Price

Average net price for full-time, first-time degree/certificate-seeking undergraduates paying the in-state tuition rate who received grant or scholarship aid from federal, state or local governments, or the institution. Other sources of grant aid are excluded. Aid received anytime during the full aid year is included. Average net price is generated by subtracting the average amount of federal, state or local government, or institutional grant and scholarship aid from the total cost of attendance. Total cost of attendance is the sum of published tuition and required fees (lower of in-district or in-state), books and supplies and the weighted average room and board and other expenses.

Source: IPEDS

Part II: Student-Level Data

Few students rely exclusively on out-of-pocket funds to pay for college. For students who are unable to cover the full cost of attendance on their own, a number of financial aid resources are available. Chiefly, these options include grants and scholarships (from governments, colleges and universities, or other organizations), student loans (from governments or private sources), as well as other niche funding programs (e.g., federal work-study). In theory, a given prospective student should be able to marshal a combination of these funding sources that will adequately – and responsibly – cover the portion of college charges the student cannot pay for personally.

To what extent do Regental students rely on specific sources of financial aid? Using data for all first-time, full-time, degree-seeking students in Fall 2013, an analysis was undertaken to examine the extent to which Regental students are able to tap various types of funding. Table 3a summarizes full-year awards for Fall 2013 students by funding type.⁴

Several observations can be made from these data. Roughly 93 percent of all Regental students were awarded some form of financial aid for the 2013-14 aid year. On average, Regental students were awarded \$9,700 in total aid, roughly 40 percent of which came from grant aid (which need not be repaid) and 60 percent came from loans. Overall, more students received some form of grant aid (82 percent) than took out loans (69 percent). Looking at loans specifically, federal loans were taken out far more frequently than outside (private) loans; only 12 percent of students took out outside loans, compared with 68 percent taking out federal loans. Among students receiving grant aid, the largest awards tended to come from outside sources, such as scholarships from state government or other non-profit organizations.

Table 3a. Sources of Financial Aid for 2013-14, Students Enrolled in Fall 2013

	Count	Mean	StDev	10 th Percentile	25 th Percentile	50 th Percentile	75 th Percentile	90 th Percentile
All Students								
<i>Federal Loans</i>	5,156	\$4,822	\$4,523	\$0	\$0	\$5,500	\$6,500	\$11,500
<i>Outside Loans</i>	5,156	\$1,075	\$3,145	\$0	\$0	\$0	\$0	\$5,000
<i>All Loans</i>	5,156	\$5,897	\$5,587	\$0	\$0	\$5,500	\$9,500	\$14,500
<i>Institutional Grants</i>	5,156	\$1,455	\$2,657	\$0	\$0	\$750	\$1,800	\$3,500
<i>Outside Grants</i>	5,156	\$2,186	\$2,864	\$0	\$0	\$1,000	\$3,585	\$6,245
<i>Work-Study</i>	5,156	\$184	\$592	\$0	\$0	\$0	\$0	\$0
<i>All Grants</i>	5,156	\$3,825	\$3,948	\$0	\$1,000	\$2,774	\$5,645	\$8,645
<i>All Aid</i>	5,156	\$9,722	\$6,372	\$1,000	\$4,350	\$9,445	\$15,173	\$18,300
Students Receiving Each Aid Type								
<i>Federal Loans</i>	3,501	\$7,101	\$3,733	\$3,500	\$5,500	\$5,500	\$9,500	\$12,500
<i>Outside Loans</i>	663	\$8,359	\$4,003	\$3,500	\$5,200	\$8,000	\$10,559	\$13,378
<i>All Loans</i>	3,543	\$8,581	\$4,732	\$3,500	\$5,500	\$6,600	\$11,500	\$15,500
<i>Institutional Grants</i>	2,994	\$2,506	\$3,087	\$500	\$1,000	\$1,500	\$2,700	\$5,000
<i>Outside Grants</i>	3,206	\$3,515	\$2,918	\$703	\$1,000	\$2,750	\$5,645	\$6,745
<i>Work-Study</i>	490	\$1,937	\$540	\$1,050	\$2,000	\$2,000	\$2,300	\$2,400
<i>All Grants</i>	4,221	\$4,672	\$3,883	\$1,000	\$2,000	\$3,600	\$6,295	\$9,495
<i>All Aid</i>	4,784	\$10,478	\$5,986	\$2,295	\$5,500	\$10,295	\$15,500	\$18,500

Source: Regents Information Systems

⁴ Regents Information Systems data may understate actual student financial aid awards given that some students may not report all outside funding received.

Table 3b explores Regental aid data in the context of student achievement. For each aid category (loans, grants, total), descriptive statistics are shown for four different groups of students:

1. Students designated for remedial coursework in one or more subjects
2. Non-remedial students with an ACT composite score below 25
3. Non-remedial students with an ACT composite score from 25 to 29
4. Non-remedial students with an ACT composite score of 30 or higher

As shown below, high-performing students (on the ACT) appear less likely than lower-performing students to borrow money for college. Only 49 percent of students with an ACT of 30 or higher were scheduled to take out loans in 2013-14, compared with 77 percent of students in the lowest ACT group. Further, students with high ACT scores also absorbed somewhat less loan debt (\$7,900) than did students with low scores (\$8,900). The opposite pattern was seen for grant aid, whereby students with high ACT scores tended to receive more grant and scholarship funding, both in frequency (98 percent versus 71 percent) and in magnitude (\$7,100 versus \$4,400).

Table 3b. Sources of Financial Aid by ACT Band

	<i>n Students in ACT Band</i>	<i>% Students with Loans</i>	<i>Avg Loans (All Students)</i>	<i>Avg Loans (Students w/ Loans)</i>
<u>Loans</u>				
<i>Remedial Students</i>	1,578	77.1%	\$6,843	\$8,873
<i>ACT Low Band (Low 20s)</i>	1,700	70.8%	\$6,057	\$8,552
<i>ACT Mid Band (High 20s)</i>	1,332	62.7%	\$5,211	\$8,313
<i>ACT High Band (30s)</i>	286	49.0%	\$3,865	\$7,896
	<i>n Students in ACT Band</i>	<i>% Students with Grants</i>	<i>Avg Grants (All Students)</i>	<i>Avg Grants (Students w/ Grants)</i>
<u>Grants</u>				
<i>Remedial Students</i>	1,578	70.6%	\$3,095	\$4,385
<i>ACT Low Band (Low 20s)</i>	1,700	80.4%	\$3,334	\$4,147
<i>ACT Mid Band (High 20s)</i>	1,332	96.8%	\$4,713	\$4,871
<i>ACT High Band (30s)</i>	286	97.9%	\$6,924	\$7,072
	<i>n Students in ACT Band</i>	<i>% Students with Aid</i>	<i>Avg Aid (All Students)</i>	<i>Avg Aid (Students w/ Aid)</i>
<u>Any Aid</u>				
<i>Remedial Students</i>	1,578	89.7%	\$9,938	\$11,083
<i>ACT Low Band (Low 20s)</i>	1,700	93.2%	\$9,391	\$10,079
<i>ACT Mid Band (High 20s)</i>	1,332	98.2%	\$9,925	\$10,107
<i>ACT High Band (30s)</i>	286	99.3%	\$10,789	\$10,865

Source: Regents Information Systems

Institutional Specific Scholarship Programs

In an effort to further assess the extent to which institutions draw upon their endowments to provide grant/aid support to their students, campus representatives were asked to provide information regarding their top four scholarship programs. The funding amounts and frequency of awards are listed for each institution. In most cases, the amounts awarded as well as frequency of awards remained static over the last three years. However, because tuition and fees have increased most years and the dollar amounts of most scholarships have not increased, the buying power of most institutional scholarships has decreased.

Black Hills State University

System Average Tuition and Fees 2011: \$7,096 (undergraduate resident)

System Average Tuition and Fees 2014: \$8,039 (undergraduate resident)

1. **Name of Premier Scholarship: Joe and Elaine Floyd Scholarship**
 - a. Range of award amounts: \$48,000 (\$12,000 per year for 4 years)
 - b. Number of recipients: 4
 - c. Changes in the last 3 years: No changes to number or amount of awards.

2. **Name of #1 Top Merit Scholarship: Joe & Martha Nelson Scholarship**
 - a. Range of award amounts: \$40,000 (\$10,000 per year for 4 years)
 - b. Number of recipients: 4
 - c. Changes in the last 3 years: The award has been reduced from a full ride to \$10,000 per year.

3. **Name of #2 Top Merit Scholarship: Clarkson Memorial**
 - a. Range of award amounts: \$7,500 (\$2,500 per year for 3 years)
 - b. Number of recipients: 3
 - c. Changes in the last 3 years: No changes to number or amount of awards.

4. **Name of #3 Top Merit Scholarship: Buzz Bonus**
 - a. Range of award amounts:
 - i. Tier 1: \$4,000 (\$1,000 per year for 4 years)
 - ii. Tier 2: \$3,000 (\$750 per year for 4 years)
 - iii. Tier 3: \$2,000 (\$500 per year for 4 years)
 - b. Number of recipients: 319 in 2013-2014 – Still awarding for 2014-2015
 - c. Changes in the last 3 years: No changes to award pool, static fluctuation in number of awards in the last 3 years.

Dakota State University**System Average Tuition and Fees 2011: \$7,096 (undergraduate resident)****System Average Tuition and Fees 2014: \$8,039 (undergraduate resident)**

The Champion Scholarship program includes DSU's premier scholarships. It is broken down into levels as described below.

1. **Name of Premier Scholarship: Presidential Champion**
 - a. Award Amount: \$2,150
 - b. Number of recipients: 65
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.
2. **Name of #1 Top Merit Scholarship: Merit Champion**
 - a. Award Amount: \$1,650
 - b. Number of recipients: 171
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.
3. **Name of #2 Top Merit Scholarship: Transfer Champion**
 - a. Award Amount: \$1,000
 - b. Number of recipients: 30
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.
4. **Name of #3 Top Merit Scholarship: Achievement Champion**
 - a. Award Amount: \$500
 - b. Number of recipients: 89
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.

Northern State University**System Average Tuition and Fees 2011: \$7,096 (undergraduate resident)****System Average Tuition and Fees 2014: \$8,039 (undergraduate resident)**

1. **Name of Premier Scholarship: President's Meritorious**
 - a. Range of award amounts: \$12,000, payable over 4 years
 - i. First year: \$3,000
 - ii. Second year: \$2,500
 - iii. Third year: \$3,000
 - iv. Fourth year: \$3,500
 - b. Number of recipients: 27
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.

2. **Name of #1 Top Merit Scholarship: WolfPACT – 28-29 ACT**
 - a. Range of award amounts: \$11,000, payable over 4 years
 - i. First year: \$2,000
 - ii. Second year: \$2,500
 - iii. Third year: \$3,000
 - iv. Fourth year: \$3,500
 - b. Number of recipients: 65
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.

3. **Name of #2 Top Merit Scholarship: WolfPACT – 24-27 ACT**
 - a. Range of award amounts: \$7,000, payable over 4 years
 - i. First year: \$1,000
 - ii. Second year: \$1,500
 - iii. Third year: \$2,000
 - iv. Fourth year: \$2,500
 - b. Number of recipients: 226
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.

4. **Name of #3 Top Merit Scholarship: WolfPACT – 21-23 ACT**
 - a. Range of award amounts: \$5,000, payable over 4 years
 - i. First year: \$750
 - ii. Second year: \$1,000
 - iii. Third year: \$1,500
 - iv. Fourth year: \$1,750
 - b. Number of recipients: 216
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.

South Dakota School of Mines & Technology

System Average Tuition and Fees 2011: \$7,096 (undergraduate resident)

System Average Tuition and Fees 2014: \$8,039 (undergraduate resident)

1. **Name of Premier Scholarship: Richardson**
 - a. Scholarship Amount: \$10,000 for one year
 - b. Number of recipients: 4
 - c. Changes in the last 3 years: Amount is up from \$8,000, but recipients are down from six.

2. **Name of #1 Top Merit Scholarship: Surbeck**
 - a. Scholarship Amount: \$9,000 per year (4 years)
 - b. Number of recipients: 8 (average 2/year x 4 years)
 - c. Changes in the last 3 years: Amount is up from \$7,000, but recipients are down from average 3/year.

3. **Name of #2 Top Merit Scholarship: SDSM&T Presidential**
 - a. Scholarship Amount: \$5,000 per year for 4 years

- b. Number of recipients: 18 (average 5/year x 4 years)
- c. Changes in the last 3 years: Amount is up from \$3,000, but recipients are down from average 8/year.

4. **Name of #3 Top Merit Scholarship: Vucurevich Presidential**

- a. Scholarship Amount: \$6,250 for one year
- b. Number of recipients: 2
- c. Changes in the last 3 years: No change to amount or number awarded.

South Dakota State University

System Average Tuition and Fees 2011: \$7,096 (undergraduate resident)

System Average Tuition and Fees 2014: \$8,039 (undergraduate resident)

1. **Name of Premier Scholarship: National Merit Finalist**

- a. Scholarship Amount: \$8,500 (Renewable up to 4 years)
- b. Number of recipients: 3 per year
- c. Changes in the last 3 years: No changes in the last three years to scholarship amount/number of awards.

2. **Name of #1 Top Merit Scholarship: Stephen F. Briggs Scholarship**

- a. Scholarship Amount: \$6,500 (Renewable up to 4 years)
- b. Number of recipients: 8 per year
- c. Changes in the last 3 years: No changes in the last three years to scholarship amount/number of awards.

3. **Name of #2 Top Merit Scholarship: Lohr Scholars in Engineering**

- a. Scholarship Amount: \$5,000 (Renewable up to 4 years)
- b. Number of recipients: 4 per year
- c. Changes in the last 3 years: No changes in the last three years to scholarship amount/number of awards.

4. **Name of #3 Top Merit Scholarship: Foundation Scholarships**

- a. Scholarship Amount: \$3,000 (Renewable up to 4 years)
- b. Number of recipients: 30 per year
- c. Changes in the last 3 years: No changes in the last three years to scholarship amount/number of awards.

University of South Dakota

System Average Tuition and Fees 2011: \$7,096 (undergraduate resident)

System Average Tuition and Fees 2014: \$8,039 (undergraduate resident)

1. **Name of Premier Scholarship: Mickelson & Presidential Alumni**

- a. Range of award amounts:
 - i. Mickelson: \$10,000
 - ii. Presidential Alumni: \$7,000
- b. Number of 2013-14 recipients: 14

- c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.
- 2. **Name of #1 Top Merit Scholarship: Coyote Commitment (Leadership, Foundation & Veritas)**
 - a. Range of award amounts:
 - i. Veritas: \$3,000 per year (4 years)
 - ii. Foundation: \$2,500 per year (4 years)
 - iii. Leadership: \$2,000 per year (4 years)
 - b. Number of recipients: 122
 - c. Changes in the last 3 years: USD is in the process of increasing the Veritas scholarship amount to \$14,000 (\$3,500/year) versus the previous \$12,000 (\$3,000/year). Additionally, the school recently added the Foundation level above. The number of awards did not increase over the past three years.
- 3. **Name of #2 Top Merit Scholarship: Coyote Commitment (Achievement & Distinction)**
 - a. Range of award amounts
 - i. Distinction: \$1,750 per year (4 years)
 - ii. Achievement: \$1,500 per year (4 years)
 - b. Number of recipients: 309
 - c. Changes in the last 3 years: The numbers of awards as well as the award amounts have remained static.
- 4. **Name of #3 Top Merit Scholarship: Coyote Commitment (Grant & Promise)**
 - a. Range of award amounts
 - i. Promise: \$1,000 per year (4 years)
 - ii. Grant: \$1,000 per year (2 years)
 - b. Number of recipients: 265
 - c. Changes in the last 3 years: USD is in the process of changing the Grant scholarship to \$2,000 (\$500/year) versus \$2,000 (\$1,000/2 years). The number of awards as well as award amounts did not increase over the past three years.