SC TEMPORARY REVENUE ADVISORY BULLETIN #00-1

SUBJECT:	College Tuition Tax Credit (Income Tax)
EFFECTIVE DATE:	Tax years beginning after 1998
SUPERSEDES:	SC Revenue Ruling #99-4 and all previous documents and any oral directives in conflict herewith.
REFERENCES :	S. C. Code Ann. Section 12-6-3385 (Supp. 1999)
AUTHORITY:	S. C. Code Ann. Section 12-4-320 (Supp. 1999) SC Revenue Procedure #99-4
SCOPE:	The purpose of a Temporary Revenue Advisory Bulletin is to provide immediate guidance to the public and to Department personnel. It is a written statement issued to apply principles of tax law to a specific set of facts or a general category of taxpayers. A Temporary Revenue Advisory Bulletin does not have the force or effect of law, and is not binding on the public. It is, however, temporary, and is binding on agency personnel only until superseded or modified by a change in statute, regulation, court decision, or advisory opinion.

Code Section 12-6-3385 provides a refundable individual income tax credit for college tuition. The purpose of this advisory opinion is to address some common questions that have arisen concerning this tax credit since its amendment during the 1999 legislative session.

QUESTIONS:

1. Who is an eligible student?

To qualify for the tuition tax credit, an individual enrolled in an institution of higher learning must meet <u>all</u> of the following requirements:

- 1. have graduated from high school during or after May 1997;
- within 12 months before enrolling in the institution of higher learning:
 a. graduated from a South Carolina high school,
 - b. completed a South Carolina high school home school program, or

- c. graduated from a preparatory high school outside of South Carolina while a dependent of a parent or guardian who is a legal resident of South Carolina has custody of the student;
- 3. be eligible for <u>in-state tuition;</u>
- 4. be admitted, enrolled, and classified as a <u>degree-seeking undergraduate</u> or be enrolled in a certificate or diploma program of at least 1 year and <u>be in good standing</u> at the institution (whether or not a student is in good standing is determined by the qualifying institution); and,
- 5. have <u>completed at least 30 credit hours at the end of the taxable year</u> for which the credit is claimed, or its equivalent as determined by the Commission on Higher Education. (A student is considered to have "completed" a course regardless of the grade achieved, however, a student receiving an incomplete or withdrawing from a course is not considered to have "completed" a course for purposes of the 30 credit hour requirement.)

NOTE: There is not a minimum Scholastic Aptitude Test (SAT) requirement or grade point average requirement to qualify for the tuition credit, however, the student must be in good standing at the institution to claim the credit.

2. Who is not an eligible student?

The tuition tax credit is <u>not</u> available to an individual enrolled in an institution of higher learning who:

- 1. obtained a GED;
- 2. is a Palmetto Fellowship recipient;
- 3. is a Legislative Incentives for Future Excellence (LIFE) Scholarship recipient;
- 4. is in default of a federal Title IV or South Carolina educational loan or owes a refund on a South Carolina student financial aid program; or,
- 5. has been adjudicated delinquent or been convicted or pled guilty or nolo contendere to any felonies, or any alcohol or drug related offenses.

NOTE 1: This ineligibility requirement does not apply to a student whose record has been expunged.

NOTE 2: If a student has been adjudicated delinquent or been convicted or pled guilty or nolo contendere to any alcohol or drug related <u>misdemeanor</u> offense, then this ineligibility requirement applies only for the taxable year in which the adjudication, conviction, or plea occurred.

3. Can a student who does not currently meet the credit requirements later qualify?

Yes. A student may currently be a Palmetto Fellowship or LIFE scholarship recipient or be in default of a student loan, but later lose the scholarship or repay the loan. At such time if the student meets all the tuition credit eligibility requirements, the student is eligible for the tuition credit for the remaining time in the 4-year credit period. (See Question 12 for the maximum years a credit may be claimed.)

For example, a student is a LIFE scholarship recipient for the 1999-2000 school year (fall 1999 and spring 2000 semesters), but does not qualify for the LIFE scholarship in the 2000-2001 school year (fall 2000 and spring 2001 semesters.) The student is a qualifying student meeting all requirements of the tuition tax credit in the fall 2000 semester and may claim the tuition tax credit for that semester provided the student completed 30 credit hours during the tax year 2000. The student may not claim the credit for the 1999 tax year or for the spring 2000 semester since the student was a LIFE scholarship recipient during that time.

4. What institutions qualify?

Currently tuition paid to the institutions of higher learning listed in Exhibit A qualifies for the credit. The list of institutions in Exhibit A is derived from the following statutory criteria for qualifying institutions of higher learning and designated institutions:

- 1. A South Carolina public institution is any state-supported-post secondary educational institution, including technical and comprehensive educational institutions. See South Carolina Code Section 59-103-5.
- 2. An independent institution is any independent eleemosynary junior or senior college in South Carolina whose major campus and headquarters are located within South Carolina and which is accredited by the Southern Association of Colleges and Secondary Schools. See South Carolina Code Section 59-113-50.
- 3. A public or independent bachelor's level institution chartered before 1962 whose major campus and headquarters are located within South Carolina;
- 4. An independent bachelor's level institution which has attained an Internal Revenue Code Section 501(c)(3) tax status and is accredited by the Southern Association of Colleges and Secondary Schools or the New England Association of Colleges and Schools; or
- 5. A public or independent two-year institution which has attained an Internal Revenue Code Section 501(c)(3) tax status.
- 5. What institutions do not qualify?

An institution does not qualify if its sole purpose is:

1. religious or theological training, or

- 2. granting professional degrees.
- 6. What qualifies as tuition?

Qualifying tuition is the amount charged by a 2-year or 4-year public institution of higher learning, including required fees, necessary for undergraduate enrollment.

Qualifying tuition at an independent institution is, however, defined as the "average tuition at the 4-year public institutions of higher learning," not to exceed the actual tuition charged. The 1999 average tuition at 4-year institutions of higher learning has been determined by the Commission on Higher Education to be \$3,547 per year, or \$1,764 per regular semester, for a student enrolled only in the fall or spring semester. See Questions 16, 17, and 18 for credit computations for schools on a traditional semester system and for schools not on a traditional semester system.

Required fees do not include fees or charges for books, room and board, student activities, athletics, meal plans, insurance, equipment, transportation, or personal, living, or family expenses.

7. What are scholarship grants that reduce tuition?

Any amounts received toward tuition payment by scholarship grants must be deducted before calculating the credit. Examples of scholarship grants include academic scholarships, athletic scholarships, South Carolina tuition grants, Pell grants, and Supplemental Educational Opportunity Grants. Grants which do not reduce tuition, <u>and</u> are not used to pay tuition, *e.g.*, a grant for room and board, are not deducted from tuition before calculating the credit.

Scholarship grants do not include student loans, educational assistance plans under Internal Revenue Code Section 127, payments for teaching, research or other services performed by the student whether or not required as a condition for receiving a tuition reduction, or veteran educational assistance benefits. Therefore, tuition amounts paid with the student's earnings, a loan, a gift, inheritance, or personal savings constitute tuition paid by the student for purposes of the tuition tax credit.

Further, to the extent contributions to the South Carolina Tuition Prepayment Program are considered paid by the student (beneficiary of the Program), the prepayment amounts constitute tuition paid by the student. Likewise, if tuition is paid by the student with money from an Education IRA, the payment constitutes tuition paid by the student (beneficiary of the IRA.) In both instances, the qualifying student, not the parent, is eligible to claim the tuition tax credit.

8. What is the credit amount?

For a student attending a 4-year institution, the credit is equal to 25% of the tuition paid during a taxable year, not to exceed \$850.

For a student attending a 2-year institution, the credit is equal to 25% of the tuition paid during a

taxable year, not to exceed \$350.

For a student attending both a 2-year and a 4-year institution in the same tax year, the credit is equal to 25% of the tuition paid during the taxable year, not to exceed \$850.

The credit amount for any student per tax year may not exceed \$850 in any circumstance.

NOTE: Before calculating the credit amount two adjustments may be necessary:

- 1. Students attending an independent institution must reduce the actual tuition paid to that of the "average tuition at the 4-year public institutions of higher learning," not to exceed the actual tuition charged. (See Question 6 for the average tuition amounts to use in computing the 1999 credit amount and Exhibit A for a list of 4-year independent institutions. The "average tuition" amount will be adjusted annually by the Commission on Higher Education,) and
- 2. Scholarship grants received toward tuition payments must be deducted from qualifying tuition.

If both adjustments apply, they must be made in the order listed above.

9. What tuition payments and credit hours are used to compute the credit?

Tuition Payments:

Amounts paid for tuition during the current tax year (winter/interim term 1999, spring semester 1999, summer semester 1999, fall semester 1999, and tuition prepaid in 1999 for the spring 2000 semester by students attending a qualifying institution in the current tax year) for qualifying students should be used to determine the tuition tax credit claimed on the 1999 South Carolina individual income tax return due April 17, 2000.

Students Attending a Full Year at a Traditional Semester School:

The Commission on Higher Education, in accordance with Code Section 12-6-3385, has authorized that the 30 credit hour requirement can be met by any combination of hours completed during the winter, interim, spring, summer, and fall terms in the current tax year.

Students Attending One Regular Semester at a Traditional Semester School:

The Commission on Higher Education, in accordance with Code Section 12-6-3385, has authorized that a student enrolled in either the fall or spring semester (but not both) at a traditional semester school in the current tax year must complete 15 credit hours in the one regular semester in order to be eligible for the tax credit. Further, the Commission on Higher Education determined that summer school hours do not count in meeting this 15 hour per regular semester requirement.

Students Attending a Full Year at a NonTraditional Semester School:

The Commission on Higher Education, in accordance with Code Section 12-6-3385, has authorized that the 30 credit hour requirement, or its equivalent, can be met by any combination of hours completed during the winter, interim, spring, summer, and fall terms in the current tax year for the following institutions:

Institution	"Equivalent Hour" Requirements
Converse	Must earn 30 hours in the tax year
Erskine	Must earn 30 hours in the tax year
Furman	Must earn 30 hours in the tax year
Johnson and Wales	Must earn 36 hours in the tax year
Wofford	Must earn 30 hours in the tax year

Students Attending One Regular Semester at a NonTraditional Semester School:

The Commission on Higher Education, in accordance with Code Section 12-6-3385, has authorized that a student not enrolled in both the fall and spring semesters of a tax year in one of the following institutions must complete the following credit hours in either the <u>fall or spring</u> semester:

Institution	"Equivalent Hours"
Converse	12 hours
Erskine	13 hours
Furman	8 hours
Johnson and Wales	12 hours
Wofford	12 hours

EXAMPLES:

Examples best explain when the credit is first available. The examples assume the students are qualifying students enrolled in a qualifying institution on a <u>traditional</u> semester system.

EXAMPLES	TAX YEAR TUITIO N PAID	SEMESTERS ENROLLED	HOURS COMPLETED DURING TAX YEAR	CREDIT ALLOWED FOR TUITION PAID DURING TAX YEAR
Student A	1999 1999	Spring 99 Fall 99	15 15	yes
Student B	1999	Fall 99	12	no
Student C	1999	Fall 99	15	yes
Student D	1999 1999	Fall 99 Spring 00	15 15 to be completed in '00	yes
Student E	1999 1999 1999	Spring 99 Summer 99 Fall 99	12 6 12	yes
Student F	1999 1999	Summer 99 Fall 99	6 9	no
Student G	1999 1999 1999	Spring 99 Summer 99 Fall 99	8 6 15	no
Student H	1999	Summer 99 Fall 99	6 15	yes
Student I	1999	Spring 00	0 (15 to be completed in tax year 2000)	no

These examples illustrate that a student must complete at least 30 semester hours during the tax year. **The 30 hour requirement can be met in any combination of hours completed during the winter, interim, spring, summer, and fall terms.** If the student enrolls in only <u>one</u> regular semester in a tax year, but not both, it does not affect the student's qualification for the credit provided the student completes at least 15 semester hours during the regular semester attended (see example of Students B and C.) Further, unlike the 30 hour requirement, summer school hours do **not** enter into the calculation of the 15 hour requirement when a student attends only one regular semester in a tax year (see example of Student F.)

Students A and E completed 30 hours during the tax year (each in different combinations) and qualify for the credit. Student G, however, completed only 29 hours during the tax year and does not qualify for the credit.

Student's B, C, F, and H attended only one regular semester in 1999. Student B does not qualify for the credit in 1999 since only 12 hours (not the required 15 "equivalent hours" per regular semester when only one regular term is attended) were completed in 1999. Student C qualifies for the credit since the 15 "equivalent hours" requirement was met. Student F completed 15 hours in the summer and fall semesters, but does not qualify for the credit in 1999 since the required 15 "equivalent hours" per regular semester when only one term is attended is not met (summer school hours are not counted in determining the 15 semester hour requirement.) Student H, however, completed 15 hours in the fall semester and qualifies for the credit for the summer and fall semesters. Students B, F, and G may qualify for the remaining portion of the credit in future years. (See Question 12 for the maximum years the credit may be claimed.)

Student D is allowed a credit for tuition paid for the fall 1999 semester and prepaid in the 1999 tax year for the spring 2000 semester since the student completed 15 semester hours for the one regular semester enrolled for in 1999 (the fall semester). The number of hours Student D is enrolled for in 2000 is not used in the 1999 credit calculation.

Student I does not qualify for the credit in 1999 for tuition prepaid in 1999 for the spring 2000 semester since the student did not attend college during the tax year.

Also, see Questions 16, 17, and 18 for computation of the credit.

10. Who do I contact for questions concerning the "equivalent hour" requirement for institutions not on a traditional semester system?

Code Section 12-6-3385(B)(3)(b) provides that a qualifying student must complete at least 30 credit hours each year, or its equivalent, as determined by the Commission on Higher Education, at the end of the tax year for which the credit is claimed. See Question 9 above for a list of "equivalent hours" approved by the Commission on Higher Education.

Questions concerning equivalent hours for any school not on a traditional semester system should be directed to:

Director, Student Services Commission on Higher Education 1333 Main Street, Suite 200 Columbia, South Carolina 29201-3245 Phone - 803-737-2260 Fax - 803-737-2297

11. What is the semester hour equivalent for a student with a disability?

The Americans with Disabilities Act may permit certain disabled students to qualify for the credit by completing a lesser number of "equivalent hours." The Commission on Higher

Education determines "equivalent hours." The Commission on Higher Education has informed the Department to instruct each student with a disability to contact the Disability Services Provider at the qualifying institution for approval of the required "equivalent hours." South Carolina Commission on Higher Education Form Number "CHE-400" entitled "Students With Disabilities - Equivalent Hour Authorization for Tuition Tax Credit" must be completed and attached to the South Carolina tax return each year the tuition credit is claimed.

12. How many years can the credit be claimed?

The credit may be claimed for no more than 4 consecutive years after the qualifying student first enrolls in an eligible institution. The credit is available for a total of no more than 5 tax years since the maximum 4-year credit period runs from the date the student first enrolls and continues for 4 years from that date so that the credit is allowed for tuition paid for no more than 8 consecutive regular semesters and any summer school or interim period tuition paid during the 4-year period.

For example, if a student enrolls in a qualifying 4-year institution on August 17, 1999, the credit period is for qualifying tuition paid for school enrollment from August 17, 1999 to

August 16, 2003. The credit may be claimed on the 1999, 2000, 2001, 2002, and 2003 South Carolina income tax returns.

NOTE: Since the credit is effective for tax years beginning after 1997, a student graduating from high school in May 1997 and attending college in 1997 will begin counting the 4-year credit period with the first semester enrolled in the 1998 tax year so that the student will not lose a portion of the 4-year credit period.

NOTE: Exceptions may be granted to extend the "four year consecutive" credit period due to medical necessity as defined by the Commission on Higher Education. Questions concerning extension of the credit period due to medical necessity should be directed to the Commission on Higher Education's Director of the Division of Student Services at the address provided in Question 10.

The following examples indicate the tax years the tuition credit may be claimed. The examples assume, unless stated otherwise, the students are qualifying students graduating from high school in May 1999 and enrolled in fall semesters August 17 through December 15 and spring semesters from January 7 through May 12 for the years indicated.

Tax	School	TAX YEARS TUITION PAID				
Year	Semeste r	Student A	Student B	Student C	Student D	Student E
1999	Fall 99	1999	1999	1999-2 yr school	1999-2 yr school	did not attend

2000	Spring 00 Fall 00	2000 2000	1999 2000	withdraws from school	1999-2 yr school 2000-2 yr school	did not attend
2001	Spring 01 Fall 01	2001 2001	2000 2001	2001-2 yr school 2001-2 yr school	2001-4 yr school	2000 2001
2002	Spring 02 Fall 02	2002 2002	2001 2002	2002-2 yr school 2002-2 yr school	2002-4 yr school	2001 2002
2003	Spring 03 Fall 03	2003 N/A	2002 N/A	2003-2 yr school 2003-2 yr school	2003-4 yr school 2003-4 yr school	2002 2003
2004	Spring 04 Fall 04	N/A N/A	N/A N/A	2004-2 yr school 2004-2 yr school	2004-4 yr school 2004-4 yr school	2004 2004

Student A - The credit may be claimed for all tuition payments made in 5 tax years - 1999, 2000, 2001, 2002, and 2003 (but only for tuition paid for semesters (and any summer sessions) ending on or before August 16, 2003).

Student B - The credit may be claimed for all tuition payments made in 4 consecutive years - years beginning August 17, 1999, 2000, 2001, 2002, and ending August 16, 2003. The prepayment of the spring 2003 tuition in the tax year 2002, however, results in the acceleration of the credit. No credit may be claimed in 2003 and thereafter.

Student C - The credit may be claimed only for tax years 1999, 2001, 2002 and 2003 (but only for tuition paid for semesters ending on or before August 16, 2003). The semesters the student did not attend in 2000 is still a year for purposes of counting the "four consecutive years" of the credit period. NOTE: The attendance at a 2-year college for more than 2 years does not affect the "four consecutive years" of the credit period.

Student D - The credit may be claimed in tax years 1999, 2000, 2001, 2002, and 2003 (but only for tuition paid for the spring or summer 2003 semesters). The transfer from a 2-year to a 4-year school does not affect the "four consecutive years" of the credit period. No credit is allowed, however, for tuition paid for fall 2003 or spring and fall 2004.

Student E - The credit may not be claimed for this student in any tax year. Since the student

graduated from high school in May 1999, and did not enroll in college until Spring 2001, over 12 months has elapsed before enrolling and the student is not a "qualifying" student.

13. Who may claim the credit?

The credit may be claimed by either:

- 1. the student paying the tuition, or
- 2. an individual paying the tuition who is eligible to claim the student as a dependent on his or her federal income tax return.

Since the credit is per student, an individual paying the tuition for more than one dependent claimable on the taxpayer's federal income tax return can claim a tuition tax credit for each qualifying student dependent.

If a parent makes tuition payments in tax years 1999 and 2000 and the student makes tuition payments in tax years 2001 and 2002, then the parent may claim the credit in 1999 and 2000 and the student may claim the credit in 2001 and 2002.

Further, if the parent and student each pay a portion of the tuition payments, 50% each for example, then 50% of the appropriate credit amount may be claimed by the parent and 50% of the appropriate credit amount may be claimed by the student. In no case can the total credit claimed for a student each year exceed the maximum credit amount. See Question 8.

14. What is a refundable credit?

A tax credit is only refundable when specifically provided in the statute. The tuition tax credit is South Carolina's only refundable credit. A refundable credit reduces South Carolina income tax owed and provides a refund to the extent the credit is larger than the tax otherwise owed. The credit is not related to adjusted gross income or tax liability.

15. How is the credit claimed?

The credit is computed on Form I-319 and claimed on the South Carolina individual income tax return - SC1040 or SC1040NR. (The credit cannot be claimed on a SC1040A-short form.) A complete copy of the taxpayer's federal income tax return must be attached to the South Carolina individual income tax return.

16. How is the credit computed for a qualifying student attending a public or private institution on a traditional semester system?

An example best explains the computation. This example is based on the following facts: (1) institutions are qualifying 4-year institutions and (2) students are qualifying students paying <u>one</u> semester of tuition during the tax year.

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CREDIT COMPUTATION			INDEPENDE INSTITUTIO	- · -
Tuition charged for semester during tax year	\$1,700		\$6,500	
Required enrollment fees	\$ 100		\$ 200	
Total qualified tuition & fees charged during taxable year* (not to exceed \$3,547 per year or \$1,764 per regular semester for private institutions listed in Exhibit A in the 1999 tax year - special rules apply for schools not on a traditional semester system - see Question 18)		\$1,800		\$1,764*
Scholarship (applied toward tuition payment)	\$ 300		\$ 300	
SC Tuition & Pell Grants (applied toward tuition payment)	\$ 500		\$ 0	
Less: Total scholarship grants received during the taxable year		(\$ 800)		(\$ 300)
Tuition qualifying for the credit		\$1,000		\$1,464
Tuition Credit - 25% of tuition paid, not to exceed \$850 a year		\$ 250		\$ 366

17. How is the credit computed for a qualifying student also attending summer school?

An example best explains the computation. This example is based on the following facts: (1) institutions are qualifying 4-year institutions and (2) students are qualifying students paying for 6 credit hours of summer school tuition during the tax year.

CREDIT COMPUTATION	PUBLIC INSTITUTION	INDEPENDENT INSTITUTION*	
Tuition charged for summer semester during tax year	\$700	\$1,200	
Required enrollment fees	\$100	\$ 200	
Total qualified tuition & fees charged for summer school* (for private institutions this number	\$800	\$709*	

cannot exceed \$3,547 times the number of credit hours completed in summer school divided by 30)		
Less: Total scholarship grants received during the taxable year	(\$0)	(\$0)
Tuition qualifying for the credit	\$800	\$709
Tuition Credit - 25% of tuition paid, not to exceed \$850 a year	\$200	\$177

In determining the total qualifying summer school tuition and fees that are eligible for the credit for private institutions, the average tuition at 4-year public institutions of higher learning must be determined as required in Section 12-6-3385(B)(4). The average tuition is based on the average tuition of \$3,547 for the tax year 1999 (or \$1,764 per regular semester if the student is enrolled only in one regular semester) as determined by the Commission on Higher Education multiplied by a fraction. The numerator of the fraction is the actual number of hours completed in summer school and the denominator is 30 hours (the total number of hours required to qualify for the credit.)

NOTE: In the above examples, tuition for public schools is based on the actual tuition paid.

NOTE: See Question 9 for examples of the required number of hours to complete in order to claim the credit.

18. How is the credit computed for a qualifying student attending an institution on a system other than a traditional semester system?

An example best explains the computation. This example is based on the following facts: (1) the student attends 30 "equivalent hours" in the tax year, as determined by the Commission on Higher Education, at a nontraditional semester school (e.g. Converse College), (2) the student is a qualifying student, and (3) the student pays all tuition in 1999 for winter, spring, and fall terms.

CREDIT COMPUTATION	TERM 1 Winter 1999	TERM 2 Spring 1999	TERM 3 Fall 1999	TOTAL
Tuition charged for term during tax year	\$ 2,000	\$6,000	\$6,000	\$14,000
Required enrollment fees	\$ 100	\$ 100	\$ 100	300
Total qualified tuition & fees charged during taxable year* (limited to \$3,547)	\$ 709*	\$1,419*	\$1,419*	\$ 3,547
Less: Total scholarship grants received during the taxable	0	0	0	0

year				
Tuition qualifying for the credit	\$ 709	\$1,419	\$1,419	\$3,547
Tuition Credit - 25% of tuition paid, not to exceed \$850 a year				limited to \$ 850

* Special rules apply to the total qualified tuition and fees for schools not on a traditional semester system. Based on the "equivalent hours" required by the Commission on Higher Education, the maximum tuition that may be claimed for each term enrolled in by a qualifying student will be prorated based on approved equivalent hours listed below for the 1999-2000 school year. For example, the \$709 interim term amount for Converse College where students take 6 hours in the winter term was calculated as \$3,547 average tuition times 6/30 "equivalent hours." The Commission on Higher Education has authorized the following full time "equivalent hours" for student's attending the following institutions to use in computing the credit:

Institution	Fall and Spring	Interim/Ot her	Notes
Converse	12 hours	6 hours	Must earn 30 hours in the tax year
Erskine	13 hours	3 hours	Must earn 30 hours in the tax year
Furman	8 hours	8 hours	Must earn 30 hours in the tax year
Johnson and Wales	12 hours	12 hours	Must earn 36 hours in the tax year
Wofford	12 hours	4 hours	Must earn 30 hours in the tax year

4-Year Public Institutions	4-Year Independent Institutions*	2-Year Institutions
Credit - 25% of tuition paid, not to exceed \$850 per tax year	Credit - 25% of tuition paid, not to exceed \$850 per tax year	Credit - 25% of tuition paid, not to exceed \$350 per tax year
Citadel Clemson University Coastal Carolina University College of Charleston Francis Marion University Lander University Medical University of SC SC State University University of South Carolina USC at Aiken USC at Spartanburg Winthrop University	Allen University Anderson College Benedict College Bob Jones University Charleston Southern University Claflin College Coker College Columbia College Columbia International University Converse College Erskine College Furman University Johnson and Wales Limestone College Newberry College Newberry College North Greenville College Presbyterian College Southern Wesleyan College Voorhees College	Aiken Technical Central Carolina Technical College Chesterfield-Marlboro Technical College Denmark Technical College Florence Darlington Technical College Greenville Technical College Horry-Georgetown Technical College Midlands Technical College Orangeburg Calhoun Technical College Piedmont Technical College Spartanburg Methodist College Spartanburg Technical College Technical College of the Lowcountry Tri-County Technical College Trident Technical College USC at Beaufort USC at Lancaster USC at Salkehatchie USC at Union Williamsburg Technical College

EXHIBIT A

*Tuition expenses are limited per school year for 4-year independent institutions.

SOUTH CAROLINA DEPARTMENT OF REVENUE

s/Elizabeth A. Carpentier, Director Elizabeth A. Carpentier, Director

Columbia, South Carolina March 28, 2000