

USC

ROSSIER
SCHOOL OF
EDUCATION



IDAs and Financial Aid:

Understanding the Puzzle and
Sharing Best Practices



The initial paper was developed by the USC “IDA-PAYS: Postsecondary Access for Your Success” project team: Vikki Frank, Adrianna Kezar, Jaime Lester, and Hannah Yang. Tim Christensen, specialist on college access and success and former financial aid administrator, produced the final version of this paper. In addition, a very special thanks to the following experts for reviewing drafts of this paper while working at the following organizations: Sandy Baum, College Board; Christy Finsel, IDA Consultant; Michelle Gilliard, Foundation for Independent Higher Education; Marty Guthrie and Tim Christensen, National Association of Student Financial Aid Administrators (NASFAA); Kevin Keely, Corporation for Enterprise Development (CFED); Leslie Parrish, Center for Responsible Lending; and Woody Widrow, RAISE Texas.

Note: Material in this paper was produced in 2008 and updated in 2009 for the 2009-10 academic year. As federal legislation and regulations change, some of this information will become outdated.

Content

Introduction	2
Purpose	3
Part I: What is Financial Aid?	5
Part II: IDAs and Financial Aid	11
Part III: Best Practices and Strategies for Maximizing Benefits of IDAs in Financial Aid	17
Part IV: Frequently Asked Questions about IDAs and Financial Aid	21
Part V: Appendices	23
Appendix 1	Assets for Independence Act: Education IDA Policies
Appendix 2	Eligibility Requirements for the Automatic Zero EFC and Simplified EFC Formula
Appendix 3	Asset Protection Allowance (APA) and the Treatment of Assets for Non-AFI IDA Savers Who Do Not Qualify for the Simplified EFC Formula
Appendix 4	Definition of an Independent Student
Appendix 5	Glossary



Introduction

Low-income students face a particularly uphill battle to find ways to cover the costs of accessing postsecondary education. The gap between the price of tuition and family income has been growing for many years. From 1987 to 2007, mean income for families in the lowest 10 percent income bracket rose 12 percent; for those in the next lowest 20 percent bracket, mean income rose by just eight percent.¹ Yet from 1988-89 to 2008-09, average published tuition and fees increased 62 percent at public two-year institutions, 69 percent at private four-year institutions, and 125 percent at public four-year institutions.² While financial aid may reduce the amount families actually pay outright by half or more,³ clearly the growth in college costs has exceeded growth in family income many times over.

Low-income students generally rely heavily on need-based financial aid to pay for college. Many Individual Development Account (IDA) practitioners may think of financial aid as grants from the state and federal governments, such as the Pell Grant. However, financial aid also refers to government-subsidized loans, work-study, private scholarships and grants, and also private market-rate loans. Two-thirds of undergraduate students take out loans to pay for school.⁴ For low-income families, the stakes are much higher when accessing loans than they are for higher-income families. Low-income households generally have poor or no credit and lack a relationship with a mainstream financial institution that allows them to access low-interest prime loans. Low-income families are also much more susceptible to higher cost loans and other predatory lending practices. With the current credit crisis, more attention is being focused on the work of nonprofit leaders in asset development to help find alternative solutions for low-income families to reduce debt burdens.

Individual Development Accounts (IDAs), originally chartered under the federal Assets for Independence (AFI) Act in 1998, may provide an opportunity for increasing access to postsecondary education for low-income youth and adults by providing funds through a mix of their own savings and federal and private funds. However, many IDA savers and IDA practitioners have raised concerns about whether IDA accountholders will face unintended negative consequences as a result of their IDA savings when they apply for financial aid to attend college. At the same time, financial aid administrators are often uncertain about integrating IDA distributions into the financial aid process and policies.

¹ U.S. Census Bureau, Current Population Reports, P60-235, *Income, Poverty, and Health Insurance Coverage in the United States: 2007* (Washington, DC: U.S. Government Printing Office, 2008), p. 40.

² The College Board, Trends in College Pricing 2008, data tables to accompany Figures 4 and 5 (New York: The College Board, 2008), p. 9 (Excel files available on the web at http://www.collegeboard.com/html/costs/pricing/1_4_over_time_constant_dollars.html).

³ *Ibid.*, p. 11.

⁴ <http://www.finaid.org/loans/>

Purpose

This paper is aimed primarily at IDA practitioners for the purpose of helping them understand how IDAs are handled in the financial aid process. This information can also be used by or shared with financial aid administrators to assist IDA practitioners in their conversations with this group. This paper attempts to clarify how IDAs should be handled in the financial aid process, with particular focus on the Pell Grant and other “portable” aid. Current best practices are offered to help IDA practitioners, financial aid administrators, and low-income IDA accountholders maximize the utilization of IDAs for educational purposes.

This paper fits into our larger three-year research study on IDAs. This project was funded by Lumina Foundation for Education, an Indianapolis-based private foundation dedicated to expanding access to and success in education beyond high school. The views expressed in this publication are those of the author(s) and do not necessarily represent those of Lumina Foundation for Education, its officers or employees. The overarching goal for this project was to examine the potential for increasing IDA use for educational purposes and to explore higher education’s involvement with IDAs and potential for greater participation. We did this by talking to IDA practitioners, postsecondary institutions and nonprofits currently partnering, and higher education leaders. In these meetings we uncovered the opportunities and challenges of partnering to offer IDAs and brainstormed what was needed to make IDAs successful. Please visit our website for more resources we collected and tools we compiled during our study, in addition to our final report—Examining the potential of education IDAs: <http://www.usc.edu/dept/chepa/IDApays/>.





Part I: What is Financial Aid?

The term “financial aid” refers to all forms of federal, state, institutional, and private funds available to students to cover the cost of their education at eligible public, private not-for-profit, and private for-profit postsecondary institutions. Financial aid refers not only to federal grant funding, but also to federal work-study programs and government subsidized and unsubsidized loans. Financial aid also refers to institutional and private grants and scholarships and, to some extent, private loans that students may seek on their own or loans that institutions include in a student’s financial aid “package” to meet the full cost of attendance at that institution.⁵ Regardless of the source, financial aid may be classified into three types: gift aid (which generally does not have to be repaid), loans (which must always be repaid), and subsidized work awards. The two largest sources of aid to undergraduates are federal loans, which make up 40 percent of the total, and grants from colleges and universities, which comprise 21 percent of the total.⁶ Low-income students generally rely heavily on need-based financial aid to pay for college.

Federal Financial Aid

Most federal aid for undergraduate students is authorized under Title IV of the Higher Education Act of 1965 as amended. Federal aid is awarded based on the student’s estimated cost of attendance and the “expected family contribution” (EFC) derived from a congressionally mandated federal methodology (FM). See Page 6 for the formula to determine financial need. The EFC is calculated using information submitted on the Free Application for Federal Student Aid, or FAFSA. Students must file the FAFSA to be considered for the federal student aid programs mentioned above. In addition, many states use the FAFSA to award need-based aid, as do most institutions. The EFC calculation looks at the family’s financial circumstances, such as parental and student income and assets, household size, number in college, and age of parents. For financially independent students, parental income and assets are not considered, but the age of the student and the number of any dependents is considered. Federal methodology does not consider home equity or consumer debt. Some institutions, however, do consider home equity in calculating an EFC for awarding their own institutional funds.

⁵ See “A Note on Student Loans” later in this section for more on private loans.

⁶ <http://www.collegeboard.com/press/releases/189547.html>

How Is Need-Based Financial Aid Awarded?

Need-based financial aid is awarded on the basis of demonstrated financial need. The formula is basic:

$$\text{Demonstrated Financial Need} = \text{Cost of Attendance (COA)} - \text{Expected Family Contribution (EFC)}$$

Each institution establishes a cost of attendance for its students which includes tuition, fees, room and board, books and supplies, travel, and personal and incidental expenses. This cost of attendance may vary by the student's level of study (e.g., undergraduate vs. graduate/professional) and program (e.g., liberal arts vs. pharmacy).

The EFC is the amount of money a family is expected to pay toward the cost of attendance for one academic year. The federal methodology (FM) EFC calculation considers the circumstances noted above. Most financial aid experts agree that the EFC is less a measure of ability to pay than a tool for allocating scarce resources. The EFC calculation is key to determining demonstrated need.

Both the COA and the EFC are used to determine Pell Grant and other need-based award amounts. The higher the COA and the lower the EFC, the more financial aid may be awarded. Generally, the lowest income students are eligible for the most need-based financial aid.

Pell Grants and Related “Portable” Aid

Eligibility for undergraduate Federal Pell Grants, Academic Competitiveness Grants (ACGs), and National Science and Mathematics Access to Retain Talent (SMART) Grants is calculated by the financial aid office at the student’s institution, but is not controlled by that institution. In other words, these grant programs are “portable” in that they may be used at any institution the student decides to attend.

Pell Grants are directed toward the most financially needy students and can range from about \$900 to more than \$5,000 per year. ACGs provide an additional \$750 to first-year Pell Grant recipients and \$1,300 to second-year Pell recipients who have completed a rigorous program of study in secondary school. SMART Grants provide an additional \$4,000 for each of the third and fourth years of a Pell recipient’s academic program in fields determined by the U.S. Department of Education, including physical, life or computer sciences, mathematics, technology, engineering, or a critical foreign language.

Federal Teacher Education Assistance for College and Higher Education (TEACH) Grants for students who agree to teach in high-need fields, such as science and foreign languages, at schools that enroll low-income students, are also portable. Students who wish to be considered for TEACH Grants must complete the FAFSA, but are not required to demonstrate financial need.

Outside resources, such as IDAs and any other private grants or scholarships the student has qualified for, are *not* considered in calculating eligibility for Pell, ACG, SMART, or TEACH Grants.

Many states also award portable grants that may be used at any institution the student decides to attend. Generally, the institution must be located in the student’s state of residence, but a few states allow grants to be taken out-of-state as well.⁷

Other portable programs include loans under the Federal Family Education Loan (FFEL) and Federal Direct Student Loan programs. Amounts awarded under these programs as well as eligibility for interest subsidies are determined by the student’s COA and EFC.

Outside resources, such as IDAs and any other private grants or scholarships the student has qualified for, are not considered in calculating eligibility for Pell, ACG, SMART, or TEACH Grants.



Campus-based Financial Aid

Campus-based funds are allocated from the government to each educational institution based on both past expenditures and the need for additional funds for students. The three federally funded campus-based programs are:

- Federal Supplemental Educational Opportunity Grants (FSEOG)
- Federal Work-Study (FWS)
- Federal Perkins Loans

⁷ National Association of State Student Grant and Aid Programs (NASSGAP), *38th Annual Survey Report on State-Sponsored Student Financial Aid: 2006-2007 Academic Year* (New York: NASSGAP, undated), p. 18.

...awards of both campus-based funds and institutional grants and scholarships are not impacted by resources like IDAs.



Campus-based funds are allocated to educational institutions to help meet the demonstrated financial need of their students. While the government provides parameters and guidelines for awarding these need-based funds, the institution has substantial flexibility based on its own awarding policies and procedures. Each institution determines the amount and mix of FSEOG, FWS, and Perkins Loan to award to students who are enrolled or accepted for enrollment. When awarding such funds, institutions take into account not only the cost of attendance and EFC, but also outside resources, including scholarships and grants that have been awarded to the student.

Campus-based funds are very limited, and institutions generally target them to very low-income students. Most IDA practitioners and financial aid administrators have found that since IDA savers are from the lowest-income households, awards of both campus-based funds and institutional grants and scholarships are not impacted by resources like IDAs. In fact, many schools have policies that encourage students to get as many outside resources as possible and do not reduce their campus-based or institutional awards as long as the student has remaining financial need. Instead, they reduce loan and/or work awards. Recently, some universities—including all of the Ivy League schools as well as dozens of other private and public institutions around the country—have begun to award financial aid packages that are loan-free.

Institutional Grants and Scholarships

Most postsecondary institutions offer grant funds which they have raised from private sources or allocated from operating funds and/or endowments. Virtually all not-for-profit institutions have fundraising arms that tap into alumni networks, corporations, and foundations. In addition, national organizations, such as the Foundation for Independent Higher Education and United Negro College Fund, work on behalf of members to raise corporate and foundation dollars for constituent institutions and their students.

While institutional grants and scholarships may be awarded on the basis of financial need, they often also consider academic achievement, athletic ability, artistic and musical talent, personal characteristics, and other factors.

A Note on Student Loans

Though included under the definition of financial aid, federal loans must be paid back once the student leaves school, whether or not they have completed their program of study. Loans may be made to either the student or the student's parents and may or may not carry an interest subsidy or be regulated by the federal or a state government. Though they may be recommended in a student's financial aid package, private loans should not be considered

financial aid but rather an alternative form of financing, such as credit card debt. Private loans are among the most expensive and risky ways to finance a college education.

Summary

Most financial aid is awarded on the basis of financial need, which is determined by subtracting the expected family contribution (EFC) from the institution's estimated cost of attendance. Common types of aid include grants and scholarships, loans, and work awards. Sources of aid may include federal and state governments, postsecondary institutions, and private entities. Most students are offered a "package" consisting of various types of aid that may include both need- and non-need-based awards.





Part II: IDAs and Financial Aid

When thinking about how an IDA might complement or impact financial aid, it is important to consider three aspects of the student's family financial situation:

- Income
- Assets
- Outside Resources

The following will cover the relationship of income, assets, and outside resources with IDAs and financial aid. The most important thing to remember is that an IDA account always puts the student saver ahead!

IDAs, **Income**, and the EFC

IDAs are targeted to the working poor, and most IDA initiatives require earned income to be deposited into an IDA account. The IDA student's and parents' income is used to calculate the EFC. As with the IDA, the EFC formula looks at household income in determining eligibility. But unlike the IDA, which considers income of all household members, the EFC formula looks separately at the income of specific earners in the household in determining the amount that can be considered available to help the student pay for education. As such, not all income in the household impacts the EFC, and the income of different household members impacts the EFC differently.

In the EFC calculation:

- The income of the student and/or spouse is most available to pay for college
- Some of the income of the parents of a dependent student is set aside with an Income Protection Allowance so only a portion of parental income is considered available to pay for college
- An independent student age 26 or older has some income set aside in the calculation based on an Income Protection Allowance so only a portion of student income is considered available to pay for college
- Income of any extended family and siblings of the student is disregarded

Since a dependent student's income is considered separately and differently in the EFC calculation from that of the student's parents, it is important to think about how to structure

The important thing to remember is that an IDA account always puts the student saver ahead!



IDA income and savings requirements. Many IDA programs require or encourage dependent students to earn income themselves to deposit into their IDA, as opposed to depositing parental income. Currently, student earnings up to \$3,080 annually will not impact the EFC formula, but student income in excess of \$3,080 could increase the EFC and lower financial aid in the current year.

Automatic Zero EFC and Simplified EFC Formula

Students from very low-income households are eligible for an Automatic Zero EFC if on their last tax return household income was \$30,000 or less AND

- At any time in the previous two years a household member received benefits from any of the designated means-tested federal benefit programs: the Supplemental Security Income (SSI) Program, the Food Stamp Program, the Free and Reduced Price School Lunch Program, the Temporary Assistance for Needy Families (TANF) Program, and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) OR
- The family or student was eligible to file a federal 1040A or 1040EZ or not required to file a federal income tax return OR
- In the case of a dependent student, the student's parent(s), or in the case of an independent student, the student or the student's spouse, is a dislocated worker.⁸

Dependent and independent students from low-income households are eligible for the Simplified EFC Formula if on their last tax return household income was \$49,999 or less AND if they meet one of the criteria listed immediately above.

If a student's family qualifies for the Simplified EFC Formula, its assets are not assessed in calculating the EFC.

Appendix 2 provides a chart detailing the eligibility qualifications for Automatic Zero EFC and the Simplified EFC Formula. A full description and forms for calculating EFCs of all types are available at <http://studentaid.ed.gov/students/attachments/siteresources/0910EFCFormulaGuide111408Attach.pdf>.⁹

IDAs, Assets, and the EFC

The FAFSA asks students for information on their assets and the assets of family members. Family and student assets are both used to calculate the EFC. EFC is the key indicator, along with cost of attendance, for determining eligibility for and the amount of need-based aid awarded. While the IDA account may or may not be considered an asset for purposes of the EFC calculation, IDA distributions—at minimum, the match portions—are considered an outside resource when disbursed and treated like an outside scholarship in the student's financial aid package.

⁸ Dislocated worker classification was added as a qualification for the Automatic Zero EFC and Simplified Needs Test effective with the 2009-10 academic year and is related to employment or homemaker status. See the glossary in Appendix 5 for a complete definition.

⁹ This links to the 2009-10 EFC calculation. It is updated annually.

How the IDA is considered in the EFC formula—whether it is excluded, considered an asset of the student, or considered an asset of the parent—is the most significant factor influencing the impact of IDs on financial aid.

Under current interpretation by the U.S. Department of Education (ED):

- Per the Assets for Independence (AFI) legislation, an AFI IDA account is not reported on the FAFSA and therefore excluded from being counted as an asset when calculating the EFC.
- For a non-AFI IDA, the savings portion may be regarded as an asset of the account holder if the student’s family does not qualify for the Simplified Needs Test. While assets of low-income parents are generally protected by an Asset Protection Allowance, a percentage of the assets of the student is considered available to pay for college and can increase the EFC and lower financial aid.
- In either case, the match portion of the IDA is treated like any other outside resource in the student’s aid package if the student is not receiving Title IV aid, and the entire distribution is treated like an outside resource if the student is receiving Title IV aid.¹⁰

If a student is saving in a non-AFI IDA account AND the student’s family does not qualify for the Zero EFC or Simplified Needs Test, then the IDA saver will need to evaluate what value of Asset Protection Allowance they qualify for in the EFC formula: Assets owned by a parent receive more favorable treatment, e.g., a higher Asset Protection Allowance, than assets owned by the student in recognition that parents need to keep a greater portion of their assets for retirement and other needs. Parents or students can always exclude any home equity from their principal residence under FM; the only assets considered in the formula are cash, checking, and savings; net value of investments; and a portion of the net value of any business or farm. Student income and assets are assessed more heavily than parents’, and a greater contribution is expected from them. This affects independent students and students with IDA accounts in their name (which is the case in a majority of youth IDA accounts).

The Asset Protection Allowance is calculated based on:

- Whether the asset is in the name of a dependent student or parent
- Whether the student has one or two parents and the age of the parents
- Independent student age and number of dependents

A comprehensive look at the impact of assets on these three categories of household can be found in Appendix 3. The 2008-09 and 2009-10 definitions of an independent student can be found in Appendix 4. The Higher Education Opportunity Act of 2008, which reauthorized the Higher Education Act of 1965, explicitly grants independent student status to foster, emancipated, and homeless youth effective with the 2009-10 academic year.

Again, for a complete description of the EFC and to review the Asset Protection Allowance Charts for 2009-10, see <http://studentaid.ed.gov/students/attachments/siteresources/0910EFCFormulaGuide111408Attach.pdf>.

Student income and assets are assessed more heavily than parents’, and a greater contribution is expected from them.



¹⁰ The major Title IV programs are listed in the “Federal Student Aid Summary Chart” in the U.S. Department of Education’s *Funding Education Beyond High School: The Guide to Federal Student Aid 2009-10*, available online at http://studentaid.ed.gov/students/attachments/siteresources/FundingEduBeyondHighSchool_0910.pdf.

Comparing the Treatment of Income and Assets in IDA Eligibility and EFC Calculation

- An IDA aggregates all income in a household to calculate IDA eligibility. The EFC formula calculates separately the income of specific earners in the household in determining the amount of household income considered available to pay for education. The income of the student is regarded as most available, parental income is regarded as partially available, and income of siblings and extended family in the household is disregarded.
- IDA saver households are usually allowed to have a maximum of \$10,000 in net assets plus a home and one motor vehicle. The EFC calculation considers parental and student assets separately. Parental assets are largely protected, but up to 20 percent of student savings may be considered available and included in the EFC.

Generally, IDA practitioners and savers have had positive experiences with the treatment of IDA distributions in financial aid.



IDAs, Outside Resources, and Financial Aid

Educational institutions use the COA and EFC to build a financial aid “package” for the student. As noted above, institutions do not control the amount of “portable” aid, such as Pell Grants, for which a student is eligible. They do, however, have considerable flexibility in determining the rest of the package. This includes the allocation of campus-based program funds such as Federal Supplemental Educational Opportunity Grant), Federal Work-Study, and Federal Perkins Loans, as well as institutional funds they may have available. Institutions set their own policies and procedures based on total available funding, the overall student body they are hoping to attract to their campus, and the specific needs of each student.

Institutions may consider outside resources—grants, scholarships, and other funds that a student has been awarded or has available to pay for school—when calculating financial aid and they must do so if the student receives need-based Title IV funding.¹¹ Most institutions have specific awarding policies that take a generous stance and encourage students to apply for and access outside resources in order to meet as much financial need as possible. However, institutions may also reduce financial aid based on outside resources, particularly if full demonstrated need has been met.

Generally, IDA practitioners and savers have had positive experiences with the treatment of IDA distributions in financial aid. IDAs for postsecondary education are still relatively new and not as widespread as other sources of student financial support. Once colleges become familiar with IDAs, they may incorporate them into their policies regarding outside resources and financial aid packages.

1. IDAs may be a bigger benefit when colleges understand the entire scope of the IDA program, including the counseling, financial education, and case management provided to accountholders. When financial aid administrators understand the purpose and structure

¹¹ See the previous footnote for a link to a listing of the major Title IV programs.

of the IDA account, they may work on their campuses to ensure that IDA distributions are treated fairly and not used to reduce other financial aid awards. Strategies that practitioners have used to explain IDAs to financial aid administrators are expanded upon in Part III of this paper.

2. Different types of schools may have more flexibility in the treatment of IDAs as outside resources.
 - The cost of attendance at community colleges is comparatively low. At the same time, such institutions generally have the least amount of campus-based and institutional grants to package for their students. Community colleges may use IDA distributions to lower the need for student loans.
 - Four-year private institutions usually have the most campus-based funds and other institutional resources, in part because their cost of attendance is much higher than public institutions. Nevertheless, it is often a struggle to package financial aid without a lot of loans. As such, these institutions are usually generous in encouraging low-income students to bring in outside resources without penalty.
 - Four-year public schools may need to make the most compromises. They may have only a modest amount of campus-based and institutional funds to allocate to a more diverse student body. As such, some may attempt to balance the availability of financial aid across all of their students by giving more weight to outside resources. Still, over time, many institutions have moved from a policy of displacing institutional grant funds with outside resources to one of reducing loan and/or work awards as long as a student still has demonstrated financial need.

One caveat regarding automated financial aid packaging is in order: Virtually all institutions now use commercial software to automate the financial aid awarding process. Without individual consideration, IDA accountholders may experience reductions in their aid eligibility. It is important for IDA practitioners and accountholders alike to communicate with their financial aid administrators and understand how the institution’s financial aid appeals process works. Personal contact may be necessary to avoid inadvertent reductions caused by automated processes.

Summary

In assessing how an IDA might complement or impact financial aid, we identified the following:

- IDA provisions aggregate all income in an IDA household to calculate IDA eligibility. The EFC formula considers separately the income of specific earners in the household. The student’s income is considered most available, parental income is considered partially available, and sibling and extended family income is disregarded.
- IDA saver households are usually allowed to have a maximum of \$10,000 in assets plus a home and one vehicle. The EFC calculation considers parental and student assets separately. Parental assets are largely protected, but up to 20 percent of student savings may be considered available and included in the EFC.

When financial aid administrators understand the purpose and structure of the IDA account, they may work on their campuses to ensure that IDA distributions are treated fairly and not used to reduce other financial aid awards.



- Since IDA savers come from the lowest-income households, most IDA education savers will also be eligible for an Automatic Zero EFC or the Simplified EFC formula. In such cases, all household assets are disregarded in calculating the EFC.

The U.S. Department of Education (ED) currently defines an IDA account as the IDA savings and accrued interest. The IDA account is considered an asset; however, if funded under the AFI legislation, it is not reported on the FAFSA. A non-AFI IDA account will be considered an asset for FAFSA purposes if the family does not qualify for the Automatic Zero EFC or Simplified EFC Formula.

ED currently views all IDA distributions as outside resources at the time of disbursement.¹² As noted above, outside resources may impact the awarding of campus-based and institutional awards. Generally, however, IDA distributions are much more likely to reduce loan and/or work awards than gift aid as long as the student has unmet financial need.

¹² This interpretation has sparked some debate because the non-match portion of an IDA account represents previous savings. Under normal circumstances, such savings in an AFI IDA account would be reported on the FAFSA (and not treated as an outside resource in the award package), but the AFI legislation specifically exempts such reporting.



Part III: Best Practices and Strategies for Maximizing the Benefits of IDAs in Financial Aid

This section provides some best practices and strategies that IDA practitioners, financial aid administrators, and IDA participants have used to maximize the benefit of their IDA to advance their educational attainment. We hope these strategies can help IDA professionals work successfully through various concerns related to program design with respect to education IDAs and financial aid. We also recognize that each IDA project is managed differently, each IDA participant is unique, and not all of these strategies and practices may work for your organization, your community, or your IDA participants.

Help colleges better understand the benefits of IDAs.

The benefits of IDAs may improve when colleges understand the entire scope of the IDA program, including the counseling, financial education, and case management provided to accountholders. Take the time to work with financial aid administrators to help them understand the IDA program in its entirety and how it can contribute to student success.

- Explain the IDA account and how the student has “earned” the match. Some IDA practitioners have worked successfully with financial aid administrators who embrace the IDA concept and do not consider IDA distributions as ordinary outside resources since the student must save in order to get the funds matched.
- Encourage financial aid administrators who embrace the IDA concept to become advocates for IDAs and ask them to help you explain IDAs to others at their institutions, at other institutions, and at meetings of their financial aid associations.
- Distribute the IDA funds as “gap funding” or “last dollar in” for tuition and books and, if necessary, request that other resources, such as Pell Grants, be applied to room and board and other expenses not covered by the IDA.
- Work with your accountholders and the educational institution to see if it is possible for the check from the IDA distribution to come from the student and contribute toward the expected student contribution, like a 529 account (recognizing, of course, that current

Encourage financial aid administrators who embrace the IDA concept to become advocates for IDAs.



U.S. Department of Education interpretation requires that the distribution be counted as a resource if the student is receiving Federal Title IV aid).

- Understand that financial aid administrators are accountable to their students, their institutions, the federal government, and all other providers of financial aid, and therefore they may not always be free to adopt policies that give IDAs the most favorable treatment.

Recognize that parental assets are protected but student assets are not.

IDA practitioners working with *non-AFI* funded IDAs may want to structure the deposits and withdrawals in an IDA savings account to maximize the benefits of IDA and financial aid.

- Consider transferring IDA accounts into a 529 account before the student applies for financial aid. This converts the savings and match into an asset of the parent with more favorable treatment in the EFC calculation.
- Put the IDA account in the name of a parent and not a dependent student. One caveat: Many IDA practitioners and some IDA participants do not want IDA accounts in the parents' names. In some cases, the money may be safer in the name of the student and may protect that student from potential losses due to any of a variety of possible parental issues.

In some cases, the money may be safer in the name of the student and may protect that student from potential losses due to any of a variety of possible parental issues.



Know if the student qualifies for an Automatic Zero EFC or the Simplified Needs Test.

It is important for IDA savers, and the IDA practitioners and financial aid administrators working with them, to know if the IDA household was eligible to submit a 1040A or 1040EZ even if they did not file one. If the household does not receive public benefits (e.g., TANF or SSI), low-income households need to know if their household was eligible to file a 1040A or 1040EZ for the most recent tax year.

- Many IDA student savers do not know what tax form their household filed.
- Commercial tax preparers may use the longer 1040 form even when a household is eligible for a 1040A or 1040EZ short form if they are paid by the page. Tax preparers should be asked to include a statement that the family was eligible to file a short form if the long form was filed instead.
- Some low-income families do not file tax returns and may be losing out not only on financial aid but also on generous tax credits like the Earned Income Tax Credit (EITC). Tax preparers should advise families on their eligibility to file a 1040A or 1040EZ short form; this may require prodding by the IDA practitioner.
- Some low-income families may not be eligible to file a 1040A or 1040EZ if they have small business income, self-employed income, rental income, or income associated with childcare payments, but may still be eligible for an Automatic Zero EFC or the Simplified Needs Test.

Keep track of student income and how it is used.

- Many IDA practitioners encourage or require dependent students to earn income themselves to deposit into their IDA accounts instead of depositing parental income. Since dependent student income is considered differently than parental income in the EFC calculation, it may be important to think about how you structure your IDA income and savings requirements. Unless a student's family qualifies for the Automatic Zero EFC, student income will be assessed separately and at a higher rate than parental income when calculating the EFC. Currently, student earnings up to \$3,080 annually will not impact the EFC, but student income in excess of \$3,080 could increase the EFC and lower financial aid eligibility.
- Federal Work-Study wages are earned income. Putting work-study wages into an IDA savings account is an eligible use of work-study income. These savings can be matched with federal and non-federal funds.

Save a little, spend a little.

- Outside resources are included in the financial aid package at the time of anticipated distribution, and only then if they are known to the institution. Many institutions do not have a mechanism for identifying outside resources before the aid package is developed, and there is no place to report anticipated outside resources on the FAFSA. If the institution does have a reporting mechanism, such as a separate institutional application, students should not report the entire IDA distribution as an outside resource. It may be helpful to work with the financial aid and bursar's offices to calculate the amount of funds the student needs from the IDA each year. While this may seem like a lot of work, some financial aid offices, especially smaller ones or those serving large numbers of low-income students, are open to one-on-one interaction. Not all campuses will agree to this arrangement, however.
- Students must file a new FAFSA each year, so it is best for a non-AFI student not to save for three years and then spend all of their IDA funds in their senior year. That would mean that their growing savings account would be assessed as an available asset each year and their early savings would count against them multiple years.

...It is best for a non-AFI student not to save for three years and then spend all of their IDA funds in their senior year.



Spread the wealth over multiple years.

- Financial aid opportunities are often more abundant in a student's first year and may decrease over the time the student is in school. Some students receive non-renewable scholarships as freshmen, and some institutions offer less grant aid and more loans after the freshman year. Think strategically about when a student most needs the IDA distributions. Most likely it will not make sense to spend the entire IDA distribution in the freshman year. The financial aid the student has access to in that year may be reduced by a large IDA distribution. Such a distribution may also leave the student short on funds in subsequent years.

- Leverage the IDA as a longitudinal tool for your program. By requiring multiple disbursements over multiple years, you are ensuring that students keep in touch with you and check in over the long-term. This is a great opportunity to monitor the student's need, provide counseling, and track progress for evaluation purposes.

Whenever possible, arrange for the IDA to be applied to AFI "qualified expenses" before the student's Pell Grant is disbursed.

Tuition covered? Don't forget other related expenses.

Tuition may be covered by Pell grants, state grants, and other financial aid, particularly at a community college, but an aid package for a student with full need should cover the entire cost of attendance, including room and board, books and supplies (often including a computer), health insurance, transportation, and, depending on the student's circumstances, childcare and disability-related expenses. IDAs can only cover what the AFI legislation refers to as "qualified expenses," defined as tuition and fees plus books, supplies, and equipment, but Pell Grants, state grants, and other financial aid can be allocated to cover other expenses related to attending college. Financial aid administrators always consider the full cost of attendance when calculating a student's aid eligibility, but they will need to be informed about the IDA distribution to make sure it is applied only to qualified expenses.

- Once the student's direct institutional charges have been covered, most types of aid can be released to the student to cover other various living costs. Institutions may be reluctant to release this aid unless they have the IDA dollars in hand.
- If the institution does not have its own book and/or computer store, the IDA accountholder will need to work with the financial aid office to be reimbursed for books, supplies, and equipment.
- Whenever possible, arrange for the IDA to be applied to AFI "qualified expenses" before the student's Pell Grant is disbursed. This is less complicated than arranging for the Pell Grant to be released after it has been applied to the student's account.

Design your education IDA for education IDA savers.

IDA program design can promote education IDA success and minimize the potential impact of IDA savings (and earned income) on financial aid by carefully considering the savings capacity of the students, savings requirements, saving structures, the match rate, and asset purchase options for their student savers.



Part IV: Frequently Asked Questions about IDAs and Financial Aid

1. Do IDAs impact eligibility for Pell Grants?

Not directly. However, non-AFI IDAs may be counted as an asset of the account holder if the student's family does not qualify for an Automatic Zero EFC or Simplified Needs Test, possibly increasing the EFC and decreasing Pell Grant eligibility.

2. Do IDAs impact eligibility for other financial aid?

They can. Neither the Assets for Independence Act nor the Higher Education Act provides that a distribution from an IDA can be ignored. In fact, the U.S. Department of Education's current interpretation requires that an IDA distribution be considered a resource for the year in which it is disbursed if the student is receiving Federal Title IV aid. If the student is not receiving Title IV aid, the institution may, at its discretion, treat only the match portion as an outside resource. Most often, the amount of the distribution will reduce any unmet need first and then reduce loan or work-study eligibility.

3. How great is the impact on federal student loans, Federal Supplemental Educational Opportunity Grants (FSEOG), or Federal Work-Study (FWS)?

It depends on the amount of the IDA distribution and whether the student has unmet need. To the extent that the distribution meets previously unmet need, the impact is zero. If the student's need is fully met, the distribution will generally serve to reduce loan or FWS eligibility. Only in rare cases would the IDA distribution have an impact on the student's eligibility for FSEOG.

4. Can IDAs impact other aid sources, such as state and institutional grants?

Yes. Similar to federal student loans and federal campus-based aid, state aid and institutional grants can be impacted since IDA distributions help meet financial need. Usually, however, the impact is minor.

As college costs continue to rise, many students are left with significant unmet need after being awarded aid from all possible sources.



5. How should I talk about IDs with the financial aid administrator?

Let your student's financial aid administrator know about the amount and timing of the anticipated IDA distribution, preferably as soon as the student receives confirmation from the U.S. Department of Education that the student's FAFSA data has been transmitted to the institution. Financial aid administrators do not need to be told that external resources have no effect on Pell Grant eligibility, but you may need to remind them that IDA distributions can only be used for tuition, books, supplies, and equipment. This would allow them to arrange for Pell Grant and other disbursements to cover costs that are not covered by the IDA. Also note that today's automated financial aid packaging software does not provide for one-on-one consideration of a student's special circumstances, so follow-up with the aid administrator in writing or in person may be needed.

6. What if the financial aid administrator wants to treat the IDA like a 529 college savings plan?

That would be incorrect. 529 plans owned by the student are considered an asset of the parent and reported as a parental asset on the FAFSA. AFI IDs are specifically *exempted* from being reported on the FAFSA, though non-AFI IDs must be reported as an asset of the accountholder.

Distributions from 529 plans are not considered outside resources, unlike IDA distributions, which are treated as external resources in the year they are disbursed. To exclude IDA distributions as external resources would require an amendment to the AFI legislation.

7. How can I maximize the benefit of an IDA in the financial aid process?

See Part III: Best Practices and Strategies for Maximizing the Benefits of IDs in Financial Aid. A "last-dollar in" approach to packaging the IDA distribution may be a helpful way to frame the intent of the IDA, at least conceptually, but remember that IDs may only be used for tuition, books, supplies, and equipment, therefore some "front loading" may be necessary. In other words, apply the IDA distribution to the student's account before disbursing the Pell Grant so that proceeds from the latter can be released to the student to cover other educational expenses.

8. How do I know if I should encourage or discourage someone to save for college?

Parents and students who save for college are always ahead of those who do not save. As college costs continue to rise, many students are left with significant unmet need even after being awarded aid from all possible sources. Whenever possible, families should pursue tax-advantaged savings programs, such as 529 plans. And never forget that significant portions of parental assets are sheltered from being considered in the EFC calculation. Never discourage college savings.



Part V: Appendices



Appendix 1 Assets for Independence Act: Education IDA Policies

AFI was established by the Assets for Independence Act (AFI Act) in Title IV of the Community Opportunities, Accountability, and Training and Educational Services Human Services Reauthorization Act of 1998, P.L. 105-285. The full text of the AFI Act is at: www.acf.hhs.gov/assetbuilding/afialaw2000.pdf.

AFI was established to work through nonprofits to serve individuals and families with limited incomes and assets. Eligible participants include:

- Households eligible for Temporary Assistance for Needy Families (TANF), or
- Household with assets that do not exceed \$10,000 in net worth (excluding a residence and one motor vehicle) AND who meet ONE of the following income guidelines:
 - Have total household income equal to or less than two times the federal poverty line (\$42,400 for a family of four in 2008).¹³
 - Are eligible for the Earned Income Tax Credit.

AFI project grants are up to \$1 million for five-year awards, with the average AFI grant at \$350,000. Organizations administering AFI IDA projects must secure non-federal funds in an amount equal to or greater than their AFI Project grants.

The IDA administrator can set the savings requirement, maximum match, and match rate to meet the needs of the students and families they serve and the ability of the IDA administrator to raise the non-federal match funds. AFI IDA savers can receive up to \$2,000 of federal funds for an individual and up to \$4,000 for a multi-person household over the course of an IDA project plus an equal or greater value of non-federal funds. IDA funds may match savings deposits at a rate between \$1 and \$8 per dollar saved by the IDA participant. The combined savings and match funds are available for education costs.

Examples:

For every \$1 a student saves they receive \$2 in matched funds

Save up to \$2,000, earn up to \$4,000 in matched funds

\$2,000 (student savings)

\$4,000 (individual maximum match funds)

\$6,000 (total funds for college)

For every \$1 a student saves they receive \$8 in matched funds

Save up to \$1,000, earn up to \$8,000 in matched funds

\$1,000 (student savings)

\$8,000 (household maximum match funds)

\$9,000 (total funds for college)

¹³ Federal Register Vol. 73, No. 15, January 23, 2008, p. 3971.

The AFI Act also describes how the IDA account (inclusive of the participant savings, federal, and non-federal match) can be spent for educational purposes.

1. All portions of the IDA account (savings as well as federal and non-federal matching funds) must be spent for educational purposes.
2. Postsecondary educational expenses paid from an IDA must be paid directly to an eligible educational institution. Eligible institutions are:
 - Institutions of Higher Education as described in section 101 or 102 of the Higher Education Act of 1965.
 - Postsecondary Vocational Education Schools (as defined in subparagraph (C) or (D) of section 521(4) of the Carl D. Perkins Vocational and Applied Technology Education Act (20 U.S.C. 2471(4)) which is in any State (as defined in section 521(33) of such Act), as such sections were in effect on the date of enactment of the AFI Act.
3. Postsecondary educational expenses include the following qualified expenses:
 - Tuition and fees required for the enrollment or attendance of a student at an eligible educational institution.
 - Fees, books, supplies, and equipment required for courses of instruction at an eligible educational institution.

AFI IDA and Financial Aid Asset Exemptions

The AFIA legislation exempts the IDA account as an asset when determining eligibility to receive federal benefits that require consideration of financial circumstances. The full language of this section of the AFI legislation is:

Section 415. **NO REDUCTION IN BENEFITS.** Notwithstanding any other provision of Federal law (other than the Internal Revenue Code of 1986) that requires consideration of one or more financial circumstances of an individual, for the purpose of determining eligibility to receive, or the amount of, any assistance or benefit authorized by such law to be provided to or for the benefit of such individual, funds (including interest accruing) in an individual development account under this Act shall be disregarded for such purpose with respect to any period during which such individual maintains or makes contributions into such an account.¹⁴

Current interpretation of the U.S. Department of Education:

“It is clear that the Assets for Independence Act excludes the current value of an individual’s IDA account from being counted as an asset when calculating the individual’s Expected Family Contribution for purposes of determining eligibility for, or the amount of, federal student financial assistance. However, neither the Assets for Independence Act nor the Higher Education Act provide that a distribution from an IDA can be ignored when determining the student’s eligibility for aid, except for Federal Pell Grants. In summary, while the current value of an IDA never affects an individual’s eligibility for federal aid, an allowable distribution from an IDA for postsecondary education expenses must be considered as a resource for the student for the year in which the distribution was made. Such a distribution could impact the eligibility of a student for federal student loans and for funds from the federal campus-based programs.”¹⁵

¹⁴ Community Opportunities, Accountability, and Training and Educational Services Act of 1998. Public Law 105-285. 105th Congress, Title IV, Assets For Independence. Assets For Independence Act. 42 USC 604 Note.

¹⁵ Baker, Jeff. U.S. Department of Education, Federal Student Aid. E-mail message dated January 21, 2007.

**Appendix 2
Eligibility Requirements for the Automatic Zero EFC
and Simplified EFC Formula
Asset Exemption Categories**

	Automatic Zero EFC	Simplified EFC Formula
Dependent student	<ol style="list-style-type: none"> 1. Parents' income¹⁶ is \$30,000 or less <u>AND</u> 2. Parents filed or are eligible to file a 1040A or 1040EZ federal income tax form, or not required to file a federal tax return <u>OR</u> 3. At any time in the past two years a household member received benefits from any of the designated means-tested federal benefit programs: the Supplemental Security Income (SSI) Program, the Food Stamp Program, the Free and Reduced Price School Lunch Program, the Temporary Assistance for Needy Families (TANF) Program, and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) <u>OR</u> 4. The student's parent is a dislocated worker¹⁷ 	<ol style="list-style-type: none"> 1. Parents' income is \$49,999 or less <u>AND</u> 2. Parents filed or are eligible to file a 1040A or 1040EZ federal income tax form, or not required to file a federal tax return <u>OR</u> 3. At any time in the past two years a household member received benefits from any of the designated means-tested federal benefit programs: the Supplemental Security Income (SSI) Program, the Food Stamp Program, the Free and Reduced Price School Lunch Program, the Temporary Assistance for Needy Families (TANF) Program, and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) <u>OR</u> 4. The student's parent is a dislocated worker
Independent student, no dependents	Not eligible for Zero EFC	<ol style="list-style-type: none"> 1. Student's (and spouse's) income is \$49,999 or less <u>AND</u> 2. Student (and spouse) filed or is eligible to file a 1040A or 1040EZ federal income tax form, or not required to file a federal tax return <u>OR</u> 3. At any time in the past two years a household member received federal means-tested benefits (see above) <u>OR</u> 4. The student (or the student's spouse, if any) is a dislocated worker
Independent student with dependents	<ol style="list-style-type: none"> 1. Student's (and spouse's) income is \$20,000 or less 2. Student (and spouse) filed or is eligible to file 1040A or 1040EZ federal income tax form, or not required to file a federal tax return <u>OR</u> 3. At any time in the past two years a household member received federal means-tested benefits (see above) <u>OR</u> 4. The student (or the student's spouse, if any) is a dislocated worker 	<p>Same as independent student with no dependents</p> <p>¹⁶ For Zero EFC and Simplified EFC eligibility, income is defined as "adjusted gross income" as calculated for federal income tax purposes or, for non-tax filers, income shown on W-2 forms plus any other earnings from work not included on W-2s. ¹⁷ See Appendix 5 for the definition of dislocated worker.</p>

Appendix 3

Asset Protection Allowance (APA) and the Treatment of Assets for Non-AFI IDA Savers Who Do Not Qualify for the Simplified EFC Formula

1. IDA savings held by students age 25 or less are not protected.

The EFC formula has no Asset Protection Allowance for dependent students or independent students age 25 or less. The formula counts 20 percent of the assets as available to pay for college. If a student who is 25 or less has \$1,000 in savings, the EFC will increase by \$200 and the Pell Grant will decrease by \$200. The higher EFC may also negatively impact eligibility for other financial aid. For students age 26 or older, the Asset Protection Allowance increases each year based on the student's age.

2. IDA savings held by parents are generally protected.

For dependent students, the parental Asset Protection Allowance for the EFC formula exceeds the asset eligibility limit of most IDAs.

In most cases, low-income parents would not be expected to contribute anything toward the EFC. When assets are assessed, only a portion of assets (12 percent) is considered available to pay for college. Assets in excess of the Asset Protection Allowance are viewed on a progressive scale taking into account both income and assets. The asset contribution is combined with the contribution from income, which may range from 22 percent to 47 percent. Never will more than 5.64 percent (12 percent x 47 percent) of the parents' total assets be considered available to pay for college. This maximum 5.64 marginal rate applies only to relatively high levels of income and assets.

3. IDA savings for independent students 26 or older are generally protected.

For independent students without dependents other than a spouse, the EFC contribution from net assets after the Asset Protection Allowance is subtracted is 20 percent. For independent students with dependents other than a spouse, the contribution is 7 percent. As with the parents of dependent students, this amount is added to the contribution from income and a percentage of the total is considered the EFC. The definition of an independent student can be found in Appendix 4.

4. Dependent student assets that are considered "Qualified Education Benefits" receive special treatment.

The College Cost Reduction and Access Act of 2007 modified the definition of assets to include qualified education benefits. Effective with the 2009-10

Appendix 3 Continued...

academic year, qualified education benefits—including 529 plans, other state prepaid tuition plans, and Coverdell education savings accounts—are reported as an asset of the parent of a dependent student regardless of whether the owner of the account is the student or the parent. (If the student is independent, the student’s or student’s spouse’s qualified education benefit is reported as an asset of the student.) In addition, distributions from qualified education benefits are not considered to be estimated financial assistance. As such, they are not considered in determining a student’s financial aid package and are not included on the award letter.

**Summary: Treatment of Assets for IDA Savers
Who Are Not Eligible for the Simplified EFC Formula**

	Treatment of Parental Assets	Treatment of Student Assets
Dependent Student	<ul style="list-style-type: none"> –Parents’ home equity is excluded –Asset Protection Allowance –Maximum 5.64% of remaining assets considered available to pay for college 	<ul style="list-style-type: none"> –No Asset Protection Allowance –20% of assets considered available to pay for college
Independent Student, no dependents	N/A	<ul style="list-style-type: none"> –Asset Protection Allowance if age 26 or older –20% of assets considered available to pay for college
Independent Student, with dependents	N/A	<ul style="list-style-type: none"> –Asset Protection Allowance if age 26 or older –7% of remaining assets considered available to pay for college

For a full description of the EFC formula, including Asset Protection Allowance charts for 2009-10, see <http://studentaid.ed.gov/students/attachments/sitesources/0910EFCFormulaGuide11408Attach.pdf>.¹⁸

¹⁸ This links to the 2009-10 EFC calculation. It is updated annually.

Appendix 4 Definition of an Independent Student

2008-09:

- Student is 24 years of age or older
- At the beginning of the school year, student will be enrolled in a master's or doctoral degree program (such as MA, MBA, MD, JD, PhD, EdD, or graduate certificate, etc.)
- Student is married as of the date of the application
- Student has children who receive more than half of their support from him or her
- Student has dependents (other than children or spouse) who live with the student and receive more than half of their support from the student
- Both of the student's parents are deceased OR the student is (or was until the age of 18) a ward/dependent of the court
- Student is currently serving on active duty in the U.S. Armed Forces, or is a National Guard or Reserves enlistee called into federal active duty for purposes other than training.
- Student is a veteran of the U.S. Armed Forces

2009-10:

- Student is 24 years of age or older
- At the beginning of the school year, student will be enrolled in a master's or doctoral degree program (such as MA, MBA, MD, JD, PhD, EdD, or graduate certificate, etc.)
- Student is married as of the date of the application
- Student has children who receive more than half of their support from him or her
- Student has dependents (other than children or spouse) who live with the student and receive more than half of their support from the student
- Student is currently serving on active duty in the U.S. Armed Forces, or is a National Guard or Reserves enlistee called into federal active duty for purposes other than training
- Student is a veteran of the U.S. Armed Forces
- At any time when the student was age 13 or older, both of the student's parents were deceased, the student was in foster care, or the student was a dependent/ward of the court.
- Student was or is an emancipated minor as determined by a court in his or her state of legal residence
- Student was or is in legal guardianship as determined by a court in his or her state of legal residence
- Student was at any time on or after July 1, 2008 an unaccompanied youth who was homeless as determined by his or her high school or school district homeless liaison
- Student was at any time on or after July 1, 2008 an unaccompanied youth who was homeless as determined by the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development
- Student was at any time on or after July 1, 2008 an unaccompanied youth who was homeless or self-supporting and at risk of being homeless as determined by the director of a runaway or homeless youth basic center or transitional living program

A financial aid administrator can make a determination of independence with documentation of unusual circumstances, even if the student initially filed as a dependent student.

**Appendix 5
Glossary**

Asset Limit	Term used in AFIA IDA legislation to determine eligibility at enrollment. The AFI asset limit is defined as \$10,000 of net assets calculated as total assets less primary home, one motor vehicle, and all outstanding debt.
Asset Protection Allowance (API)	Table used in calculating the federal Expected Family Contribution that determines the value of assets that will be excluded from the calculation. For dependent students, the API is based on the number of parents in the household and the age of the older parent. For independent students, the API is based on marital status and the age of the student.
Campus-Based Programs	Federally-funded financial aid programs that are administered by eligible participating schools. Campus-based programs include Federal Perkins Loans, Federal Supplemental Educational Opportunity Grants (FSEOG), and Federal Work-Study (FWS).
Cost of Attendance (COA)	Costs related to a student’s enrollment in a postsecondary school for a defined academic period. COA components include tuition and fees, room and board, allowances for books and supplies, transportation, and miscellaneous personal expenses, along with other applicable expenses such as loan fees, dependent-care costs, costs related to a disability, and study-abroad costs. The EFC is subtracted from the COA to determine the student’s need for aid.
Dislocated Worker	<p>A dependent student’s parent or an independent student may qualify as a dislocated worker if he or she meets one of the following conditions:</p> <ul style="list-style-type: none"> • He or she has lost his or her job. • He or she has been laid off or received a lay-off notice from his or her job. • He or she is receiving unemployment benefits due to being laid off or losing a job and he or she is unlikely to return to a previous occupation. • He or she is self-employed but is unemployed due to economic conditions or natural disaster. • He or she is receiving unemployment benefits; however he or she may not be considered a dislocated worker if he or

she has quit his or her job and is receiving unemployment benefits.

- He or she is a displaced homemaker. A displaced homemaker is generally a person who previously provided unpaid services to the family (e.g., a stay-at-home mom or dad), is no longer supported by the husband or wife, is unemployed or underemployed, and is having trouble finding or upgrading employment.

Eligible Institution

AFI legislation specifies the types of institutions eligible for education IDA account distributions. They include institutions of higher education as described in section 101 or 102 of the Higher Education Act of 1965 and postsecondary vocational education schools, which are area vocational education schools as defined in section 521(4) of the Carl D. Perkins Vocational and Applied Technology Education Act.

Expected Family Contribution (EFC)

A calculated amount, based on a formula established by Congress, of how much the student's family can be expected to contribute toward the cost of the student's education in an award year. The EFC is calculated when the CPS successfully processes a student's FAFSA information and is one component schools use to determine the amount and type of aid the student can receive.

Federal Supplemental Educational Opportunity Grant (FSEOG) Program

A federal campus-based grant program that provides grant assistance to undergraduate students who have not earned a bachelor degree or first professional degree. Priority in awarding Federal Supplemental Educational Opportunity Grant (FSEOG) funds is given to students who have exceptional financial need and are Federal Pell Grant recipients.

Federal Work-Study (FWS) Program

A federal campus-based employment program that provides funding to participating schools in order that they can provide jobs to eligible undergraduate and graduate students with demonstrated financial need.

Federal Pell Grant

The largest need-based federal grant program for undergraduate students. Pell Grants may fund any portion of the cost of attendance. As such, they can be allocated around "tuition-only" resources and/or disbursed directly to students to cover non-institutional expenses, such as off-campus room and board.

Federal Perkins Loan Program

A campus-based loan program that provides low-interest student loans to undergraduate and graduate students with financial need.

Financial Aid

All government, institutional and private grants, scholarships, work-study and loans available to students to help them cover the costs of attending an educational institution.

Gift Aid

Grants, scholarships, stipends, and other financial aid awards that do not have to be repaid as long as the student meets the awarding criteria.

Qualified Expenses— Education IDAs

AFI legislation specifies Qualified Expenses for IDA account distributions. AFI education IDAs funds are limited to paying tuition, and purchasing books and required educational supplies.



The IDA-PAYS website: <http://www.usc.edu/dept/chepa/IDApays/>.

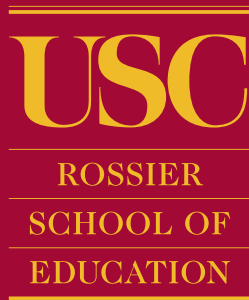
This website is a comprehensive guide to help those interested in IDAs — education practitioners, IDA practitioners, researchers, and policy analysts. Please browse through our website to gain a better understanding of the project, education IDAs, and other related topics.

See [About the Project](#) for information on the research team and advisory board, a background of IDAs, an overview of our research, and funding.

For IDA and education practitioners interested in education IDAs, find out more under the [Resources](#) link. Here we have posted our resources on education IDAs, program design, applying for a grant, and financial and asset-specific education.

For researchers and policymakers check out the [Publications](#) link to view the final report, financial aid paper, and other papers we have written for this research project. We have also collected key publications on education IDAs from other organizations.

To email the research team visit [Contact Us](#).



chepa

CENTER FOR HIGHER EDUCATION POLICY ANALYSIS

Rossier School of Education
University of Southern California
701 Waite Philips Hall
Los Angeles, CA 90089-4037

(213) 740-7218
www.usc.edu/dept/chepa