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Advancing Equity Through A Universal Financial Aid Application Policy

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Preface

Over 50% of American students in our public schools are Latinx, Black, Asian American, Native Hawaiian and Pacific Islander (NHPI), or American Indian/Alaska Native (AIAN). Tapping into their talent and ensuring their access to a college education is essential to our future economic power and the success of our multi-racial democracy. Despite the historical exclusion and current underrepresentation of many Americans in our colleges and universities, in June 2023, the Supreme Court of the United States severely curtailed the use of race in higher education admissions, prohibiting the consideration of an applicant’s racial status as part of that process.

Race-conscious admissions helped ensure America’s colleges and universities were more diverse. Without it, there is a greater urgency for college leaders and policy makers to review current practices for equity, and to identify solutions that provide a fairer approach to preparing students for college, admitting them, and supporting their success. Towards that aim, the Campaign for College Opportunity is releasing a series of briefs, including this one, as part of our [Affirming Equity, Ensuring Inclusion and Empowering Action](#) initiative. The series will elevate practices that support the college preparation, admission, affordability, and success of Latinx, Black, Asian American, NHPI, and AIAN students, ensuring America does not return to an era of exclusion in higher education.

Overview

In this brief, we share the benefits of policies requiring high school seniors to complete a state or federal financial aid application that supports their attainment of a college degree. The brief provides an overview of universal financial aid application policies in place around the country, then takes an in-depth look at California’s requirement for all students to fill out a Free Application for Federal Student Aid (FAFSA) or California’s state-level financial aid application for undocumented students, the California Dream Act Application (CADAA). It concludes with recommendations for policymakers considering universal financial aid application requirements in their states or districts.



The Importance Of The Financial Aid Application

Financial aid opens the door to a college degree and makes higher education a real possibility for students from all racial and ethnic backgrounds. Student knowledge about financial aid availability and application processes, however, varies substantially by race, ethnicity, and income.¹ Despite belonging to families with lower-than-average family incomes and higher-than-average rates of poverty, Latinx, Black, underrepresented Asian American and NHPI, and AIAN students are the

least likely to know about existing assistance to pay for college (e.g., federal and state financial aid programs) and tend to leave a substantial amount of financial aid untapped.² For example, California high schools with high concentrations of low-income students and students from minoritized backgrounds have some of the lowest financial aid application rates in the state,³ and too many eligible students do not complete a financial aid form because they think they will be ineligible, have no information on how to apply, or misunderstand the requirements of the application process.⁴

High school seniors who complete financial aid applications enroll in college at higher rates than their peers who do not; this is especially true for students from low-income backgrounds.⁵ When students know they will receive grant aid for college, their college persistence and probability of degree attainment go up.⁶



As such, universal financial aid application completion policies have the potential to lead to more equitable access to college and a college degree for Latinx, Black, underrepresented Asian American, NHPI, and AIAN students.



Universal Financial Aid Application Policies












Universal financial aid application policies require that all high school seniors submit a federal or state financial aid form or sign a waiver to opt out of applying for financial aid before they graduate from high school.⁷ The policies vary by state, as either an individual student mandate or a Local Education Agency (LEA; for example, school districts, county offices of education, and charter schools) mandate. Louisiana was the first state to pass a universal financial aid application completion policy, requiring all high school seniors to complete a FAFSA, state aid application, or waiver opting out of completing a financial aid application as a requirement for graduating from high school. By the 2023-24 school year, eight states (Louisiana, Illinois, Alabama, Colorado, Texas, California, Maryland, and New Hampshire) had a universal financial aid application policy. Three states (Indiana, Nebraska, and Oklahoma) will implement universal financial aid application policies in 2024-25, and Kansas will commence its policy with the 2027-28 school year.

Most states followed the Louisiana model, passing a universal financial aid application completion policy as a graduation requirement for high school seniors. Maryland's policy, however, requires LEAs to encourage and assist as many high school students as possible to complete the FAFSA, and Colorado's policy established a grant for LEAs that implement the requirement to complete the FAFSA.⁸



By fall 2024, 11 states will require high school seniors to complete a financial aid application to graduate from high school.

Table 1. States with Universal Financial Aid Application Completion Policies

School Year Implementation Date	State	Mandate Type
2017-18	Louisiana	Student 
2020-21	Illinois	Student 
2021-22	Alabama	Student 
2021-22	Colorado	District 
2021-22	Texas	Student 
2022-23	California	District 
2022-23	Maryland	District 
2023-24	New Hampshire	Student 
2024-25	Indiana	Student 
2024-25	Nebraska	Student 
2024-25	Oklahoma	Student 
2027-28	Kansas	Student 

Data Source: National College Attainment Network

Most states with financial aid requirements passed a graduation requirement that puts the onus on students and their families to complete the FAFSA or an application for state financial aid (e.g. the CADAA). Among the states and local districts that mandated financial aid application completion in the formal high school graduation process, there was no adverse impact on high school graduation rates, due in part to the “opt-out” provisions of the requirements.⁹

LOUISIANA'S UNIVERSAL FINANCIAL AID APPLICATION COMPLETION POLICY

The Louisiana State Board of Elementary and Secondary Education formed a FAFSA Task Force¹⁰ with representation from the Louisiana Department of Education, Louisiana Board of Regents, Louisiana Office of Student Financial Assistance, and postsecondary partners to support students and their families in completing financial aid applications. Then they launched a FAFSA Now campaign to educate students and families about the benefits of FAFSA completion and to encourage families to complete the form early.¹¹

Data from the state's first year of implementation demonstrated the policy's effectiveness and dispelled concerns that making financial aid application completion a graduation requirement would create a barrier to obtaining a high school diploma. In the first year of implementation, Louisiana saw the percentage of high school seniors who completed the FAFSA increase 26% compared to the prior year.¹² The state's high school graduation rate increased by more than three percentage points to 81%. The graduation rate for Black students increased by 5% and, at 78%, exceeded the national average for the first time, while graduation rates for students from economically disadvantaged backgrounds increased by nearly three percentage points. **Furthermore, the state enrolled an additional 1,500 new postsecondary students in the first year of statewide implementation.**¹³



The takeaway? Louisiana's universal financial aid application completion policy led to record numbers of students completing the FAFSA and enrolling in college.¹⁴

Other states, including Illinois, Alabama, and Texas, saw similar gains in financial aid application completion.¹⁵

SUPPORTING STUDENTS THROUGH UNIVERSAL FINANCIAL AID APPLICATION COMPLETION IN CALIFORNIA

California runs one of the most generous financial aid programs in the country, which promotes educational equity by making post-secondary education more affordable for all Californians.¹⁶ The financial aid application, be it the FAFSA or CADAA, opens the door to numerous resources that include federal and state grant and loan aid, institutional aid, and other scholarships. Unfortunately, California supported only half of its graduating high school seniors to complete financial aid applications prior to the passage of its policy mandating completion as a high school graduation requirement.¹⁷

In 2018, the California legislature required all LEAs in the state to ensure every student, starting in the 2020-21 school year, receives information on how to properly complete and submit a financial aid application at least once before entering 12th grade.¹⁸ In 2021, California went further, passing a universal financial aid application policy via legislation,¹⁹ and California's budget included statutory changes that require LEAs to confirm that all high school seniors either complete a FAFSA or CADAA or opt out of applying for aid. This new requirement took effect for students graduating in the 2022-23 academic year.²⁰ California's universal financial aid application policy ensures that school districts, county offices of education, and charter schools are invested in supporting their students and families in applying for financial aid.

California has numerous campaigns and programs aimed at increasing FAFSA and CADAA completion rates, but prior to 2022, there was no legal requirement for LEAs to ensure that their students were completing and submitting the FAFSA or CADAA. Whether schools helped students learn about and complete an application varied. Latinx, Black, underrepresented Asian American and NHPI, and AIAN students disproportionately attended schools with low financial aid completion rates, and California schools with larger percentages of low-income students had the lowest completion rates.²¹

In the 2021-22 school year — the year prior to the state's universal application policy taking effect— the state failed to support half (50%) of all graduating high school seniors in completing financial aid applications for college.²² EdTrust-West estimates that each year, California students leave \$550 million in federal and state aid untouched.²³ Other research estimates that eligible California community college students leave nearly \$130 million in Pell Grant funding on the table in a single semester.²⁴



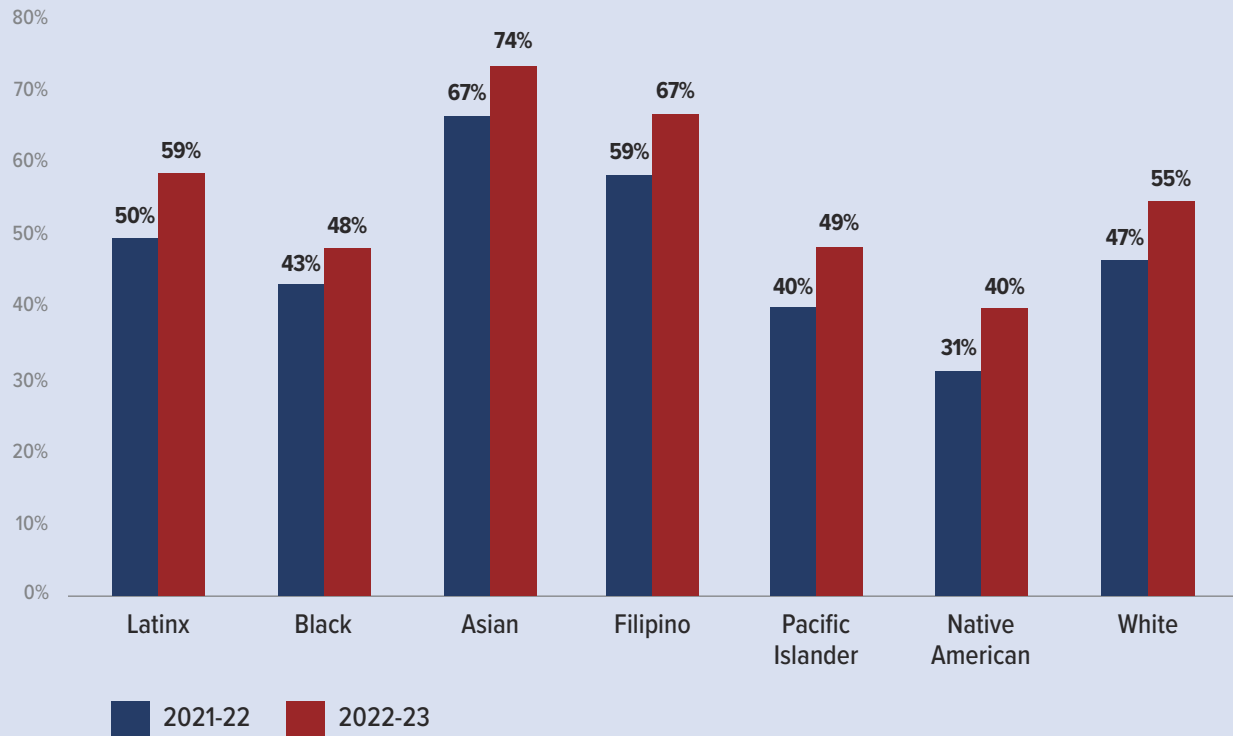
HOW HAS UNIVERSAL FINANCIAL AID POLICY PLAYED OUT IN CALIFORNIA?

Early data show that California’s universal financial aid application completion policy is having positive results. At the March application deadline for students applying to in-state four-year colleges and universities, the FAFSA/CADAA completion rate climbed from 53% in 2022 to 61% in 2023.²⁵ This translates to an increase of more than 32,000 high school students completing financial aid applications by March 2 of 2023, compared to the year prior.²⁶ By the September application deadline for students attending a California community college, almost three out of every four California high school graduates (74.2%) had completed either a FAFSA or CADAA.²⁷

Importantly, the share of students submitting a financial aid application increased for every racial/ethnic subgroup between 2022 and 2023. Financial aid application rates for Latinx, Native American, and Filipino students saw gains of about nine percentage points. The share of Pacific Islander students and white students submitting applications each increased by eight percentage points, and the share of Asian American high school seniors completing an application increased by seven percentage points. The rate at which Black students completed the FAFSA or CADAA rose five percentage points, and Black students remained less likely than their white, Asian American, or Latinx peers to complete a financial aid application in California.

Financial aid application completion rates rose for students from every demographic subgroup following the implementation of California’s universal financial aid application completion policy.

Figure 1. Share of High School Seniors Completing Financial Aid Applications Before and After the State’s Universal Financial Aid Application Requirement.



Data Source: FAFSA/CADAA submission data by race from California Student Aid Commission. Total Applications by High School Dashboard, high school 12th grade cohort size by race/ethnicity from California Department of Education Enrollment data.

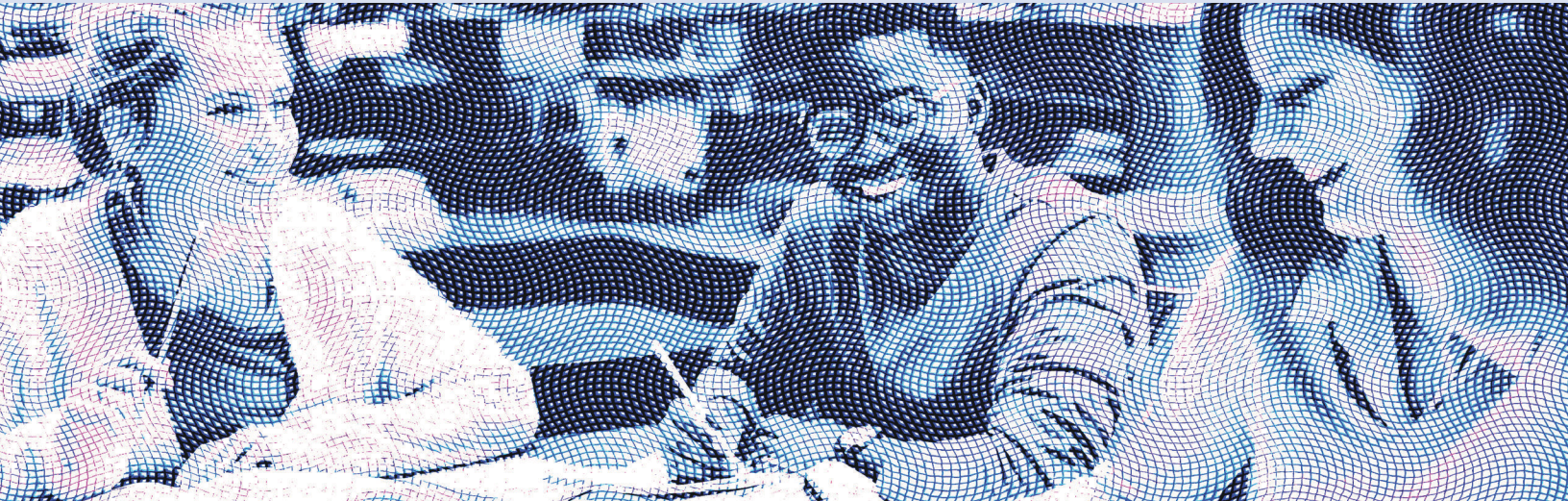
While there was a drop in the overall number of CADAA applications from March 2022 to 2023, the number of new filers completing a CADAA application - a population which includes high school students and other first time filers - increased during that time.²⁸ This is especially encouraging because undocumented students encounter challenges in completing financial aid applications, related to fear of government interaction, concern for family safety, and a lack of awareness regarding pathways to pursue higher education.²⁹ Additionally, uncertainty over qualifying for in-state tuition and concerns about the confidentiality of information disclosed in the application process further complicates the issue.³⁰ One way to maintain and build upon this progress in increasing the number of new filers completing Dream Act applications is preventing or dissuading opt-out practices that dissuade financial aid completion and instead encourage opting out of completing a financial aid form. When states

develop opt-out guidance for universal financial aid application completion, policymakers must design a process that ensures that students and families fully understand the implications of opting out and that informs all students of the advantages of completing a financial aid application, such as accessing aid to assist with college expenses. Additionally, providing resources for completing a financial aid application can further support students in navigating this critical process.

Improvements to the FAFSA are underway, with the U.S. Department of Education debuting a new FAFSA application, Better FAFSA.³¹ In California, changes are occurring through the Better FAFSA/Better CADAA³² that include streamlining the financial aid process for undocumented students; embedding the determination of the nonresident tuition exemption within the CADAA; and building the parental signature into the application, eliminating the separate PIN creation process that is often a barrier to students completing the CADAA.³³

LESSONS FROM CALIFORNIA

Before California enacted its statewide financial aid application completion policy, the state contained a patchwork of efforts aimed at improving application rates. In the wake of a universal application policy, these initiatives formed the basis of efforts to implement the new state law. Innovative schools, school districts, counties, and nonprofit groups have provided several successful financial aid policy implementation strategies and models.³⁴ Below, we highlight promising practices from statewide, district, and high school efforts that are making significant strides with financial aid application completion. These include direct state or district efforts, as well as the work of and outcomes at two districts and two high schools with the highest FAFSA and CADAA completion percentages as part of California’s Race to Submit campaign.





The Race to Submit statewide campaign, run by the California Student Aid Commission (CSAC), aims to motivate California high schools and school districts to support their students with FAFSA and CADAA submission.³⁵ The website tracks rates of FAFSA and CADAA submission (whether an application was submitted to CSAC) and completion (whether an application was submitted and completed, meaning it then can be processed for financial aid) at the state and local levels.

CSAC leads a number of additional activities and programs to ensure financial aid application completion throughout the state: Cash for College workshops,³⁶ the California Student Opportunity and Access Program (Cal-SOAP),³⁷ and maintaining the Race to Submit dashboard. It also provides professional development training for counselors and administrators on how to use California’s WebGrants system, a data system used to track students’ completion rates and identify non-completers.³⁸

BLU Educational Foundation



Innovative, community-based organizations provide a successful financial aid policy implementation model. One example is BLU Educational Foundation (BLU), whose mission is to provide educational and human services programming to youth, adults, and organizations to build healthy, productive communities. In 2020, BLU launched the “Leave No Money on the Table” campaign to eliminate barriers to college affordability and to provide access to financial aid resources in California’s Inland Empire region.³⁹ BLU has named the eight school districts, or the “Equity Eight,” that it is partnering with, in Riverside and San Bernardino counties — San Bernardino City, Riverside, Rialto, Moreno Valley, Palm Springs, Victor Valley Union, Chaffey Joint, and Fontana. These school districts and BLU came together to commit to increasing financial aid application completion rates for high school students to 70%. The campaign follows a three-tiered strategy that utilizes statewide, regional, and local initiatives to increase application completion rates and educational equity throughout the Inland Empire. BLU works with high schools and districts there to ensure that students are fully informed and supported with college financial aid resources. BLU also provides targeted, individualized support to Black students by working with districts with significant Black student populations and with districts that need investments in Black students to support financial aid completion.

Los Angeles Unified School District



In 2021, the Los Angeles Unified School District (LAUSD) created “Got a Plan for That? Removing Barriers to College and Career Success,”⁴⁰ an initiative directing district leadership to set a goal of 100% financial aid application completion. LAUSD created the Financial Aid Success Toolkit⁴¹ to guide schools on engagement strategies to support financial aid application completion (e.g., videos, slide decks, communication templates, social media samples, and training for staff through live and recorded workshops). LAUSD collaborated closely with Cal-SOAP Los Angeles⁴² and Cash for College community partners to offer workshops for students and families. As a result of these efforts, application completion rates increased each year, growing from less than two-thirds (64%) of seniors completing applications in 2020-21 to 80% in 2022-23.⁴³ Students living in poverty particularly benefited, with almost 1,700 more students at the highest-need schools completing applications; this represented an increase of 28 percentage points between 2020-21 and 2022-23 for district high school students living in poverty.⁴⁴



Val Verde Unified School District



Riverside County, for example, started a Race to Submit challenge to increase its rate of completed financial aid applications.⁴⁵ School counselors shared financial aid reports and engaged in a friendly competition to see which high school could receive the highest FAFSA/CADAA completion rates. In 2017, the county's Val Verde Unified School District passed a new policy, modeled after Louisiana's, making completing a financial aid application a graduation requirement. In one year, the district saw an increase in FAFSA/CADAA completion rates from 69% to 83%, and enrollment in college immediately after high school increased.

With this policy, the Val Verde district built a college-going culture, including recognizing and celebrating students' accomplishments in school-led activities and their participation in broader college-going efforts.⁴⁶ The district's high schools, such as Rancho Verde High, Citrus Hill High, and Orange Vista High, celebrate students for completing their financial aid applications during a school day concert and at festivals called Ca\$hchella, FAFSA Fiesta, and the Money Gras\$ Celebration. The celebration of application completion includes a DJ, glow sticks, face painting, and dancing, and also reinforces the college-going culture with the display of lawn signs with students' names, pictures, and the names of the colleges and universities they're attending in the fall. The Val Verde Unified Class of 2023 reached a 96% FAFSA/CADAA submission rate and a 92% completion rate (as of June 30, 2023).⁴⁷ Across all racial and ethnic student groups, Val Verde Unified achieved above 90% completion rates: Black, 95%; Latinx, 96%; Asian American, 100%; Filipino, 100%; Native American/Alaska Native, 100%; Native Hawaiian/Pacific Islander, 100%; and white, 95%. CSAC has recognized Rancho Verde High, Citrus Hill High, and Orange Vista High as consistent winners in the Race to Submit statewide campaign.





San Marcos High School creates a schoolwide culture of financial aid application completion and uses the California Student Aid Commission's (CSAC) WebGrants system to monitor the school's application completion rates. Its multitiered approach to data collection and targeted support includes the following:⁴⁸

- ✓ **Tier 1:** Classroom lessons, workshops, regular encouragement to all students to apply, and communication about the importance of completing financial aid applications early.
- ✓ **Tier 2:** Strategic use of data to target student outreach and intervention. The WebGrants⁴⁹ tool allows staff to sort students by financial aid application completion status: Yes, No, and No Application. Staff then reach out to students with "No" as their financial aid application status to assist them with their applications.
- ✓ **Tier 3:** Continuous collaboration with IEP (Individualized Education Program) case managers and Advancement Via Individual Determination (AVID) teachers to provide individualized support to students from priority groups who may benefit from targeted support.

As a result of this multitiered approach, 85% of students (732 out of 857) in the San Marcos High School Class of 2023 submitted either a FAFSA or CADAA, 80% (693 out of 857) completed either a FAFSA or CADAA, 5% submitted a FAFSA or CADAA but did not complete it, and 15% did not complete a FAFSA, CADAA, or sign an opt-out waiver.⁵⁰ The school saw an increase in financial aid application completion – from 74% for the Class of 2022 to 80% for the Class of 2023. CSAC has recognized San Marcos Unified as a consistent winner in the Race to Submit statewide campaign.

Jurupa Hills High School



Jurupa Hills High School received a directive from district leadership in 2016 to ensure that 100% of high school seniors complete a financial aid application and apply to college.⁵¹ In their Local Control and Accountability Plan, a document required by the state, district officials also dedicated \$11 million to increasing college readiness and addressing college affordability issues. This funding was used for additional counseling hours for programs and services, providing financial aid resources to students, training support and supplies for counselors and AVID coordinators, and hiring temporary positions for financial aid application support. Jurupa Hills High School implemented three schoolwide practices:

- ✓ Building staff buy-in through presentations about the importance of all high school seniors completing a financial aid application.
- ✓ Fostering a culture of collaboration between counselors, teachers, administrators, and staff.
- ✓ Creating a senior seminar for all students to develop a plan for themselves after high school.

When students start at Jurupa Hills, and throughout their high school journey, staff communicates to students and their families the expectation of completing financial aid and college applications. To educate families about the financial aid process, and to improve access to higher education for low-income families, Jurupa Hills' counseling staff dedicates time to meeting in small groups with students, holding individual student meetings and parent and student meetings, and making phone calls to parents.

All high school seniors there must take the senior seminar during the school day. The curriculum covers financial aid application completion, college application completion, and information about student loans and financial aid. Seminar instructors ensure that all seniors have access to the information they need to prepare them for postsecondary education. One of the course assignments is to complete a financial aid application, which is a way to support students' families while helping students learn about the financial aid they are entitled to. The Jurupa Hills High Class of 2023 achieved a 99% financial aid application submission rate and a 100% completion rate.⁵² Students from every racial and ethnic student group benefited from FAFSA completion, with 100% submission from Latinx, Black, AIAN and Filipino students; and upwards of 95% for Asian American and other NHPI students. CSAC has recognized Jurupa Hills High School as a consistent winner in the Race to Submit statewide campaign.



Recommendations for State, Higher Education System, and Institutional Leaders

Ensuring equitable access to financial aid rests on ensuring that students complete financial aid application forms. To this end, we provide state, district, and local policymakers with recommendations on how to adopt, implement, and strengthen universal financial aid completion policies, ensuring that every high school student is supported to complete financial aid application forms and receive the information needed to make an informed choice about college attendance. For more on these recommendations, please see EdTrust-West’s 2019 report, “Hidden Figures: A Framework to Increase Access to Financial Aid”—five research-based components of success.⁵³



STATE POLICYMAKERS:

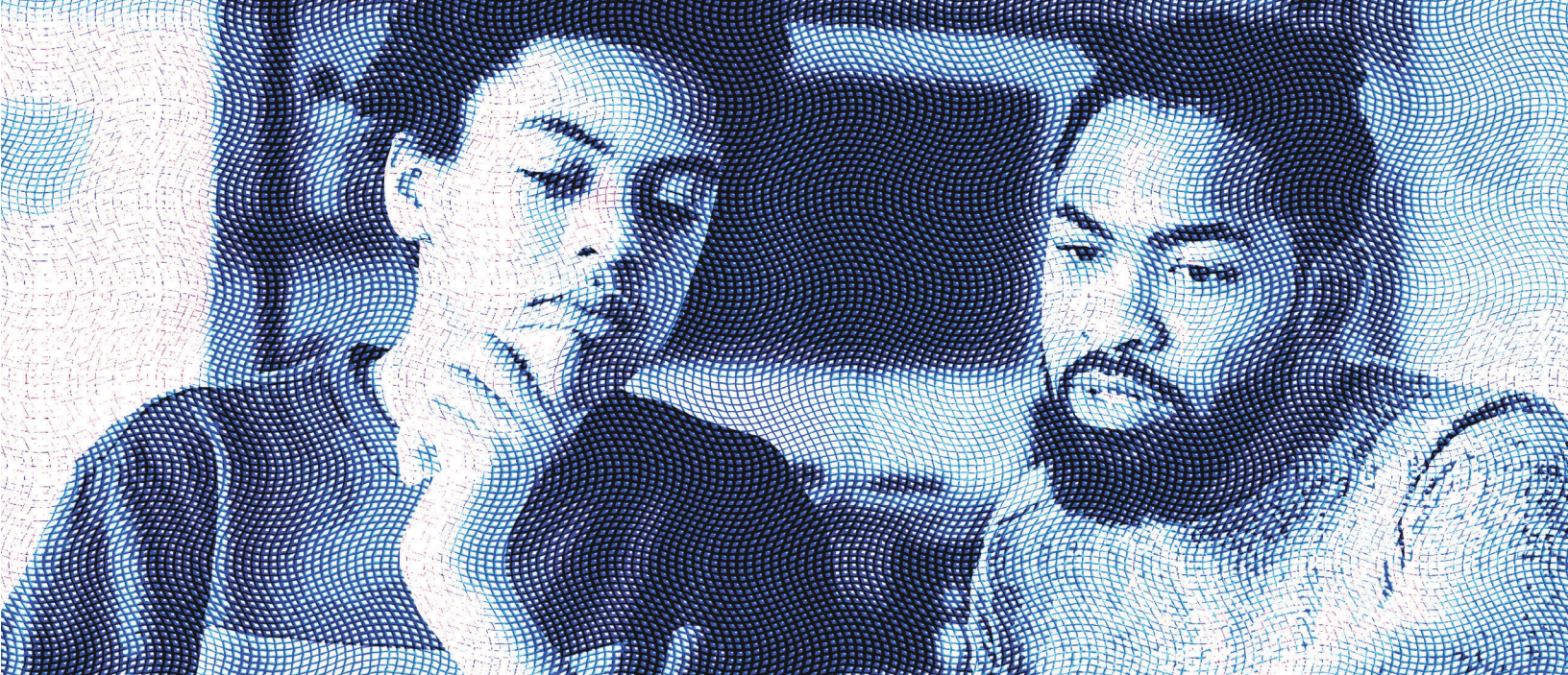
- Establish a requirement that all high school students complete an application for college financial aid before graduating from high school and ensure that all students, through state legislation or state department of education policy, are supported to submit and complete financial aid applications.
- Establish a system to monitor financial aid application completions and college attendance for high school seniors, with real-time application completion reports for all high schools in the state.
- Establish a system to monitor financial aid application completion for community college students—a population that would benefit from greater support to access valuable financial aid, similar to high school seniors.
- Ensure adequate funding to broaden outreach to students and families, especially at high schools with historically low financial aid application completion rates and in areas with higher concentrations of students from low-income families, ensuring support for non-English-speaking households; to compensate existing staff and hire additional staff for financial aid application outreach and support; and to provide overtime pay for staff outside of regular school hours to help students and families complete the applications.
- Fund professional development training for staff to understand and address challenges that diverse communities within their regions face in completing financial aid applications. Such groups may include students from low-income families, foster youth, system-impacted students, and undocumented students.



LOCAL EDUCATION AGENCIES:

- Increase financial aid application completion rates by setting district financial aid goals and action plans to reach or exceed 90% completion within each district or network, ensuring targets for 90% completion among subgroups, such as students from low-income families or from schools with historically low application completion rates.
- Direct financial aid application resources to assist and support students living in poverty, coordinating with statewide and regional application completion efforts.
- Ensure that communications campaigns are in multiple languages, with messages targeted at groups within the community that emphasize the availability of financial aid for college and that advertise support and assistance programs for students and families.





HIGH SCHOOL, COLLEGE, AND/OR UNIVERSITY ADMINISTRATORS:

- Engage authentically and meaningfully with underserved and underrepresented students and families to build their knowledge about financial aid options in culturally sustaining and accessible ways.
- Establish and maintain partnerships with LEAs, community colleges, universities, community-based organizations, education technology organizations, college advising corps, and philanthropic and direct service organizations to raise awareness of financial aid opportunities and to increase financial aid application completion rates through programming, digital tools, and additional support.
- Establish friendly competitions to encourage financial aid application submissions among high school students, high schools, districts, county offices of education, and college students in community colleges and universities, and celebrate their success in increasing financial aid application completion rates and developing a college-going culture.
- Require all seniors to enroll in a senior seminar in which students develop a plan for themselves after high school and that includes curriculum and class assignments to help students complete financial aid and college applications.

Conclusion

Data from California, Louisiana, and other states show that universal financial aid application completion policies increase the number of students completing financial aid applications, with increases across demographic subgroups. A bold commitment to universal financial aid application completion policies, implementing them in states without them and enhancing them in states where they currently exist, has the power to improve college access for students across the country and for groups from all racial and ethnic backgrounds. Given historically low financial aid application rates among Latinx, Black, underrepresented Asian American and NHPI, and AIAN students, and the disproportionate rates at which these same groups experience poverty or low-income circumstances, this policy has tremendous potential to address racial inequities in college enrollment and postsecondary persistence.



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