

## APPENDIX

**Testimony of David J. Socolow, Executive Director  
New Jersey Higher Education Student Assistance Authority**

**Joint Committee on the Public Schools  
June 9, 2023**

Good morning, Co-Chair Cryan, Co-Chair Reynolds-Jackson, and Members of the Joint Committee on the Public Schools. Thank you for holding this meeting about the benefits of encouraging more students to complete financial aid applications.

Under Governor Murphy's leadership, New Jersey is making postsecondary education and training more affordable through vital policies and investments that include:

- Establishing the New Jersey College Promise, offering a pathway to a degree that is either tuition-free or at a significantly reduced net price for tens of thousands of students at the state's community colleges and senior public colleges and universities, with a proposed expansion in the fall of 2023 to cover students with incomes up to \$100,000;
- Enhancing the State's Tuition Aid Grant (TAG) program, through expanded student eligibility, improved benefit amounts, and for the first time this year, providing additional TAG awards during summer terms beyond the traditional fall and spring of the academic year to help students graduate faster with less debt;
- Supporting more students by boosting funding for the Educational Opportunity Fund (EOF), Governor's Urban Scholarships, and the New Jersey Student Tuition Assistance Reward Scholarships (NJ STARS); and
- Increasing the transparency of postsecondary costs through new consumer information and protection standards that help students and families better understand the true net prices that they will pay for their programs of study.

To find out how they could benefit from these options, students must first complete the Free Application for Federal Student Aid (FAFSA). Students can unlock opportunities to benefit from the valuable grants and scholarships administered by the New Jersey Higher Education Student Assistance Authority (HESAA) by filing the same FAFSA form that is required for federal student aid. New Jersey Dreamers who are eligible for State student aid, but not federal aid, apply using HESAA's Alternative Financial Aid Application. Many colleges and universities also use the FAFSA to award institutional scholarships directly to students. In addition, these financial aid applications are required for certain assistance programs that can help pay for qualified skills training certificates and other trade and career-oriented programs.

HESAA conducts extensive outreach to assist individual students and families, and supports initiatives organized by school leaders and community groups to boost completion rates.

- During the past academic year, from September 2022 through May 2023, HESAA's outreach team reached more than 56,000 New Jersey students and families at 661 different public events held in every county of our state, including financial aid information presentations, FAFSA completion workshops, college and career fairs, financial literacy education, and college planning sessions. We coordinate these events in partnership with schools, libraries, community- and faith-based organizations, adult learning centers, and Upward Bound and GEAR UP groups, among others.
- HESAA also gives presentations at forums sponsored by legislators, and I invite you and all your colleagues to work with us to host similar events to raise awareness in your

districts about the value and importance of financial aid. Our outreach team will meet you where you are – informing your constituents in person or online, in English or in Spanish.

- We also encourage every high school to participate in HESAA’s data-sharing agreement, which enables authorized school personnel to monitor the status of their 12th grade students’ progress toward completing financial aid applications, so they can target individualized communications to the students who might need extra help or a reminder to complete the relevant forms.
- In addition, HESAA reaches more than 1,200 secondary school guidance counselors at more than a dozen training sessions each year, raising their awareness of the changing federal and state financial aid landscape, including federal updates to the FAFSA, and helping counselors guide families in responding to the typical issues that they may face when filing applications.

HESAA is dedicated to informing students and helping them access the programs that make college more affordable in the Garden State, including focused efforts to help students overcome barriers to completing financial aid applications, especially among low-income and first-generation students. We have more to do: the FAFSA completion rate among New Jersey’s current high school class of 2023 is tracking only slightly ahead of last year’s pace of 64 percent.

This work makes a crucial difference to students and their families, as students who complete financial aid applications are not only more likely to enroll in higher education, they are also more likely to earn a degree. Because more than one-third of our state’s 2022 high school graduates failed to complete the FAFSA by the time the academic year started last September, they left an estimated \$92 million in federal financial aid on the table, and potentially millions more from TAG, New Jersey’s College Promise, EOF, NJ STARS, the Governor’s Urban Scholarship, and other state support for students enrolled at institutions located in New Jersey.

In addition to high school seniors, HESAA also works to reach adults who may be considering returning to college, including former students who earned some college credits but did not complete a degree. Nearly 40 percent of financial aid applicants are independent students, who are generally at least 24 years old.

Postsecondary education and training generally pays off. As noted in the Rutgers Heldrich Center’s January 2023 report on the “Benefits of Education in New Jersey,” bachelor’s degree holders earn median wages that are 53 percent higher than the earnings of workers with no more than a high school diploma. The report concluded that “higher levels of education have a positive return on investment to the individual, the state, and society” and “helps individuals and families achieve upward social and economic mobility.”

To ensure that higher education continues to open doors to economic advancement, Governor Murphy’s administration, in partnership with the Legislature, is striving to improve affordability. One essential component of boosting college access and success, and closing equity gaps for traditionally underserved students, is to increase our collective efforts to encourage our fellow New Jerseyans to apply for financial aid. We at HESAA look forward to working with all stakeholders to reach more students and families with this crucial message.



**PHILIP D. MURPHY**  
Governor

**SHEILA Y. OLIVER**  
Lt. Governor

**State of New Jersey**  
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1-800-792-8670  
[www.hesaa.org](http://www.hesaa.org)

**DAVID J. SOCOLOW**  
Executive Director

Dear High School Leadership:

Completing a financial aid application is the first step in making education after high school possible for New Jersey students. To assist you in supporting your Class of 2022 seniors in exploring their postsecondary options, the New Jersey Higher Education Student Assistance Authority (HESAA) launched an efficient and secure way to identify which of your current 12<sup>th</sup> graders still need to complete a financial aid application.

When a New Jersey student completes a financial aid form – either the Free Application for Federal Student Aid (FAFSA<sup>®</sup>) or the New Jersey Alternative Application for Financial Aid that is completed by New Jersey Dreamers – they become eligible for New Jersey’s College Promise, offering a tuition-free pathway to an associate or bachelor’s degree at one of our state’s public institutions of higher education, through the Community College Opportunity Grant and the Garden State Guarantee.

These crucial financial aid applications are also the required starting point for students to access many other valuable financial aid programs. Once a student submits their applications, they are considered for financial aid from the federal government, the State, and individual colleges, universities, and trade schools, including Pell Grants, Tuition Aid Grants (TAG), and the Educational Opportunity Fund (EOF).

To encourage your students to complete financial aid applications, the counselors or approved personnel at the high school(s) within your district can use the New Jersey Financial Aid Management System (NJFAMS) to upload a roster of 12<sup>th</sup> grade students with only the following data elements: students’ first names, last names, dates of birth, and the ZIP codes in which each student resides. Once the roster is in NJFAMS, the counselor or approved staff member can run a report that will indicate which students already submitted, started, or have yet to initiate an application for financial aid. This report can be generated weekly or at any other interval that best serves the needs of your staff in guiding your students.

This new service is free. To get started, complete and submit the Data Sharing Agreement here: <https://www.hesaa.org/Documents/Data%20Sharing%20Agreement.pdf>

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A printed copy of the Data Sharing Agreement is enclosed in this envelope. You may print and sign and send back in the provided envelope. Once we receive your signed agreement, HESAA will work directly with your district's designated staff to provide individual, secure password-protected access to updated, near real-time information about your students' progress toward completing their financial aid applications.

Using these weekly updates, your counselors will have the information they need to target their outreach to the students who might need extra help or a reminder to complete the relevant financial aid application. Students who apply for this valuable funding will be better informed about the net cost of college, enabling them to make informed decisions about their post-high school life and career choices, regardless of which path they ultimately follow.

Thank you for your partnership in championing the success of New Jersey's high school graduates.

Sincerely,



David J. Socolow  
Executive Director  
New Jersey Higher Education Student Assistance Authority

# ANNUAL SECONDARY SCHOOL COUNSELOR TRAINING INSTITUTE



HESAA is pleased to announce registration is now open for the 2019 Secondary School Counselor Training Institute. This FREE three hour workshop for Financial Aid Training Hours will include a general session as well as your choice of breakout sessions.

This year's topics will include:

- Federal and State Aid Updates
- 2020-21 FAFSA Completion
- NJFAMS System
- Community College Opportunity Grant (CCOG)
- NJ Dreamers

Free continental breakfast will be served at each location.

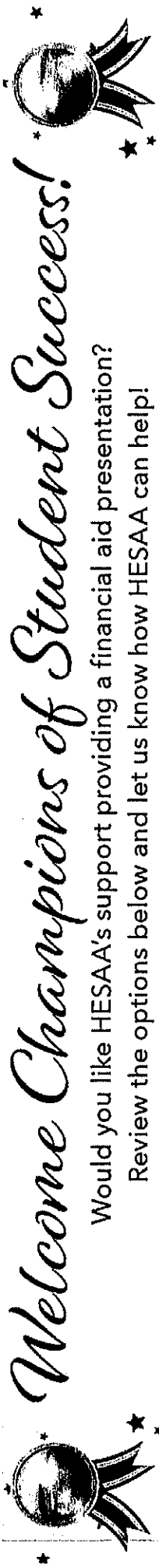
To register go to [www.hesaa.org](http://www.hesaa.org), click on: School Counselors then Secondary School Counselor Workshops and register.

Questions about the workshops? Please contact Maryann Stone at [mstone@hesaa.org](mailto:mstone@hesaa.org)

## 2019 Dates & Locations - 8:30am-1:00pm

10/2 - Cumberland County College	10/29 - Rider University
10/3 - Sussex County Community College	10/30 - Rowan College at Gloucester County
10/11 - Middlesex County College	10/31 - Drew University
10/16 - Bergen County Community College	11/1 - Rowan College at Burlington County
10/23 - Georgian Court University	12/6 - Seton Hall University
10/25 - Stockton University	

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# Welcome Champions of Student Success!

Would you like HESAA's support providing a financial aid presentation?

Review the options below and let us know how HESAA can help!

## College Admission Planning Sessions

These sessions provide guidance to students and their families in planning and understanding the college admissions process. Students will gain a better understanding of the value and benefits of a 2-year college and the transition to a traditional 4-year college. These sessions also help families understand the financial aid differences in choosing a safety school vs. a reach school. The focus is to help put families at ease with the college admissions process, including the search, application process, and how it all impacts financial aid.

## Financial Aid Information Sessions

As you work to build awareness of financial aid for higher education at your school, be sure to request a financial aid presentation from HESAA. HESAA will participate in your Financial Aid Night by providing a one-hour overview of the financial aid process and answer questions about grants, scholarships, and loans offered by the State of New Jersey. Feedback has shown that HESAA's information sessions to students and their families make everyone feel more comfortable with the financial aid process and they leave with an understanding on how to apply for federal and state financial aid.

## FAFSA Workshops

These workshops are designed to provide an overview on the importance of FAFSA completion and addresses the questions of Who? Why? And how? FAFSA Workshops take place at your school within an available computer lab. HESAA hands out materials and discusses the FAFSA process. This talk is followed by an interactive support session where HESAA staff will assist students with their FAFSA completion. These workshops run for approximately 2 hours.

Before requesting a free workshop, please confirm that your school has an available computer lab on that date.

## Student Loans Overview

This workshop provides the attendees with valuable knowledge of the various sources of loan aid available to students and families to pay for higher education. More specifically, these sessions explain the differences between student loans provided by the federal government, student loans provided by state government, and private education loans provided by for-profit bank lenders. Topics include the following:

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- Why do I need a student loan?
- Student loan calculators
- Student loans vs parent loans
- Loan limits, interest rates and features
- Repayment of loans and varying repayment plans
- Where to find information about your student loans
- Consequences of not paying your student loans
- Options to manage student loans after graduation

## REGISTRATION

In an effort to build financial aid awareness to as many as possible, please limit your request to one date per registration request and allow at least 21 days (3 weeks) prior to your requested event date for approval. HESAA makes every effort to accommodate your requested date.

Click here to register

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# Please Join Asw. Carter

as she welcomes area college-bound residents to come learn about financial aid.

## Thursday, March 23

6 - 8 pm • Plainfield Public Library  
800 Park Avenue, Plainfield, NJ 07060

*Graduating high school Seniors  
and their parents are encouraged to attend.*

Scan the code to register.  
This event is **FREE** and open to the public.



**SCAN  
ME!** →



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**TESTIMONY TO THE JOINT COMMITTEE ON THE PUBLIC SCHOOLS  
NEW JERSEY LEGISLATURE  
BILL DEBAUN  
SENIOR DIRECTOR, NATIONAL COLLEGE ATTAINMENT NETWORK  
JUNE 9, 2023**

Mr. Chairman, Ms. Chairwoman, and members of the Joint Committee on the Public Schools, thank you for this opportunity to testify on the Free Application for Federal Student Aid (FAFSA) and its completion as a potential requirement for high school graduation. My name is Bill DeBaun, and I am a senior director at the National College Attainment Network in Washington, DC. I called the Garden State home for the first 18 years of my life, and as someone who benefited greatly from the receipt of a high-quality education from Monroe Township Public Schools, it is a particular honor to appear before you today. It is my hope that New Jersey will continue to pursue policies and practices that connect more students with life-changing college and career pathways following high school graduation.

The National College Attainment Network (NCAN) and our over 500 affiliates work in communities across the country to increase equity and excellence in postsecondary degree access and attainment. Our vision is that all students - especially first-generation students, students from underrepresented racial/ethnic backgrounds, and those from low-income backgrounds - have an equitable opportunity to achieve social & economic mobility through higher education.

As a nation, we have made progress over the past 20 years with more students pursuing higher education, but when we scratch the surface of the data, attainment gaps of over 20 percent points persist by race and income. Unfortunately, those attainment gaps also exist here according to the Lumina Foundation's Stronger Nation report based on 2021 population data. Although New Jersey is a leader nationally in aggregate educational attainment, by race and ethnicity Asian and White residents have significantly higher rates of postsecondary attainment than Black and Hispanic residents.<sup>1</sup>

Students face all kinds of obstacles to accessing, persisting at, and completing postsecondary pathways, but survey after survey, as well as NCAN members' own experiences, show that

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<sup>1</sup> <https://www.luminafoundation.org/stronger-nation/report/#/progress/state/NJ>

affordability is one of the largest hurdles to surmount. I have often described the FAFSA as the key that unlocks the door to the grants, loans, and other sources of financial aid that make postsecondary education more affordable and, subsequently, accessible. Access to the Pell Grant, the cornerstone of federal financial aid, subsidized and unsubsidized federal loans, Federal Work-Study, and more are contingent on completion of the FAFSA.

The FAFSA also unlocks doors in New Jersey, which has made significant investments in its own financial aid programs. The assortment of programs administered by HESAA, including TAG, the NJ College Promise (which includes both CCOG at 2-year public institutions and GSG at 4-year public institutions), NJSTARS, NJSTARS II, and GUS all require a FAFSA completion or completion of a New Jersey Dreamer application.

By making college more affordable, the FAFSA puts a postsecondary degree in reach and changes the lifetime earnings trajectory of millions of students. Over the course of a 40-year career, an associate degree translates into a \$1.9 million income boost over a high school diploma and a bachelor's degree yields an additional \$2.6 million over an associate degree.<sup>2</sup> New Jersey collectively benefits from increased college attainment, too. The state has a thriving economy fueled by innovative business, finance, professional, and technical services that rely on talented workers to compete. Yet, the state also faces a persistent and growing mismatch between in-demand jobs and the workers needed to fill them.<sup>3</sup>

In recent years New Jersey has performed well in terms of FAFSA completion. NCAN tracks high school seniors' FAFSA completions using our interactive FAFSA Tracker. Through May 26, New Jersey's class of 2023 ranks 11<sup>th</sup> nationally by percent of high school seniors completing a FAFSA at 55.8%.<sup>4</sup> This is above the national completion rate of 50.9%. New Jersey's class of 2022 through last September had a 64.1% completion rate, good for 10<sup>th</sup> nationally and above the national rate of 57.7%.<sup>5</sup>

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<sup>2</sup> [https://ihe.uga.edu/sites/default/files/inline-files/The%20Power%20of%20Potential--BMGF%20Final%20Report\\_2.pdf](https://ihe.uga.edu/sites/default/files/inline-files/The%20Power%20of%20Potential--BMGF%20Final%20Report_2.pdf)

<sup>3</sup> <https://www.mckinsey.com/featured-insights/employment-and-growth/the-garden-state-in-bloom-cultivating-new-jerseys-workforce-of-tomorrow>

<sup>4</sup> <https://formyourfuture.org/fafsa-tracker/>

<sup>5</sup> <https://public.tableau.com/app/profile/bill.debaun.national.college.access.network/viz/FormYourFutureFAFSATracker-2022-23FAFSACycle/HomePage?publish=yes>

Even with this strong FAFSA completion performance, there is still room for improvement and room for both students, communities, and the state to benefit. For example, in New Jersey's high school class of 2022, eligible seniors who did not complete the FAFSA could have received an additional \$92 million in federal Pell Grants, in addition to any other federal or state aid for which they would have been eligible.<sup>6</sup> Nationally, Pell Grant-eligible seniors from the class of 2022 left \$3.58 billion in Pell Grants on the table by not completing the FAFSA.<sup>7</sup>

NCAN's research shows that FAFSA completion often suffers from the inequity we see in postsecondary access and attainment. For New Jersey's high school class of 2019, for example, school districts at the 25<sup>th</sup> percentile of district poverty had FAFSA completion rates of about 67% compared to 60% for districts at the 75<sup>th</sup> percentile of district poverty.<sup>8</sup> This occurred despite the fact that students in higher-poverty school districts would have disproportionately benefited from the financial aid made available to them by the FAFSA.

Recognizing the benefits of educational attainment to individuals, families, communities, and the state overall, legislatures and agencies across the country have employed various strategies for increasing FAFSA completion and smoothing the way toward postsecondary pathways. Improvements to data sharing processes, statewide FAFSA completion marketing efforts to students and families, competitions in the form of FAFSA completion challenges within and across districts and schools, and investments in state-supported training and programming are some examples of these efforts.

Beyond these approaches, requiring FAFSA completion for high school graduation is a policy that has gained significant momentum since being first instituted in Louisiana for their high school class of 2018.<sup>9</sup> This policy, now referred to widely as "universal FAFSA" has since been adopted elsewhere. Illinois (class of 2021), Texas and Alabama (2022), and California and Maryland (2023) have implemented similar policies. New Hampshire (2024), Indiana, Nebraska, and Oklahoma (2024); and Kansas (2028) are all slated to implement similar policies in the future.<sup>10</sup>

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<sup>6</sup> <https://public.tableau.com/app/profile/bill.debaun.national.college.access.network/viz/NCAN-PellDollarsLeftontheTable-Classof2022/VisualDashboard>

<sup>7</sup> *Ibid.*

<sup>8</sup> <https://www.ncan.org/news/480053/Students-in-Higher-Poverty-School-Districts-Are-Less-Likely-to-Apply-for-Financial-Aid.htm>

<sup>9</sup> <https://www.ncan.org/news/456196/Bayou-States-New-FAFSA-Rules-Plant-Seeds-for-Student-Success.htm>

<sup>10</sup> <https://www.ncan.org/page/UniversalFAFSA>

A1181 now asks New Jersey's legislature to consider its own universal FAFSA effort. I have been invited today to testify to share insights about FAFSA completion outcomes in other universal FAFSA states. These insights come from NCAN's FAFSA Tracker, a study of the limited body of research on these policies' effects on students' postsecondary outcomes, and our significant discussions with state-level agencies and organizations who have worked to implement these policies or have their states adopt them.

I would note, before moving forward, that A1181 calls for the universal FAFSA in New Jersey to commence with the high school class of 2024. NCAN's recommendation is that there be a full academic year between passage of such a high school graduation requirement and its implementation. This is to give plenty of time for students, families, practitioners, and systems to plan for a successful implementation. The 2023-24 academic year will already have its own challenges nationally with FAFSA completion; the forthcoming Better FAFSA will delay the start of the FAFSA cycle until sometime in December 2023 and bring with it a new, streamlined process for FAFSA completion. Although we anticipate that this process will make FAFSA completion easier for many students based on pulling in IRS data, the transition from the current FAFSA to the new one will likely include some pain points for practitioners and advocates across New Jersey and the nation overall. Consequently, the class of 2024 is probably not the right one to experience universal FAFSA first in New Jersey.

Considering the FAFSA completion outcomes in states with universal FAFSA policies during those policies' implementation years, there have been generally large increases to FAFSA completion. For example, compared to the class of 2017, Louisiana's class of 2018 completed 25.9% more FAFSAs by about June 30; the national percent change year-over-year for 2018 compared to 2017 was just 1.9%.<sup>11</sup> Unsurprisingly, the estimated percent of seniors completing also increased, by more than 11 percentage points, from the class of 2017's 58.8% to the class of 2018's 69.9%. This caused Louisiana to move from being ranked 12th by percent of seniors completing in 2017 to 2nd for 2018.<sup>12</sup>

Texas and Alabama during their implementation years saw similarly large gains year-over-year of 25.9% and 24.9%, respectively, compared to a national year-over-year increase of 4.6%. These gains moved from Alabama from 34<sup>th</sup> nationally, with a completion rate of 46.7% to 9<sup>th</sup>

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<sup>11</sup> <https://www.ncan.org/news/456155/FAFSA-Completion-Increases-Sluggish-Nationally-in-2018-19-Cycle.htm>

<sup>12</sup> <https://www.ncan.org/news/613062/Digging-Deeper-into-Universal-FAFSA-Impacts-in-Four-States.htm>

nationally, with a completion rate of 58.7% by about June 30. Texas increased its FAFSA completion rate by about 12.5 percentage points to move to 5<sup>th</sup> nationally, up from 23<sup>rd</sup> the previous year.<sup>13</sup>

Illinois and its high school class of 2021 offer more subdued results. Consider the significant Covid-19-induced hardships on students, families, and the education system writ large during the 2020-21 academic year. It was a difficult time to implement a universal FAFSA policy, and the nation overall experienced a 4.8% decline in FAFSA completion year-over-year. Illinois was one of just three states to finish with a positive percent change in year-over-year FAFSA completion; that it was 3.1% and the largest of any state in the nation is a reflection more of the difficult implementation context than of the policy itself.<sup>14</sup>

We have not yet arrived at June 30, a key milestone date that NCAN uses to examine FAFSA completion outcomes, but California and Maryland's outcomes in their implementation year bear examination. California's FAFSA completions are up 11.1% year-over-year after being as high as 22% earlier in the cycle, and Maryland's are up 4.9%. Nationally, high school seniors' FAFSA completions through May 26, 2023 are up 3.9%.<sup>15</sup>

Of course, FAFSA completion isn't the ultimate goal for most states' universal FAFSA policies. Given the association between FAFSA completion and enrollment, especially for students from school districts with higher poverty rates, states considering these policies no doubt are hoping that increased FAFSAs will translate into increased matriculation and, eventually, educational attainment.<sup>16</sup> The small window of years and number of states where these policies exist means the evidence base around their effects on enrollment, persistence, and completion is still nascent. It is also important to note that states largely implemented these policies just as the Covid-19 pandemic was bearing down on the country, ushering in large-scale declines in college enrollment that persist to this day. This makes it hard to accurately assess these policies' impacts on postsecondary enrollment to-date.

Covid-19 complications aside, measuring FAFSA completion occurs over a relatively short timeframe, examining students' postsecondary outcomes takes place in a much longer window. For example, the high school seniors who first experienced Texas and Alabama's

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<sup>13</sup> *Ibid.*

<sup>14</sup> <https://www.ncan.org/news/573024/FAFSA-Completion-Dwindles-Nearly-5-Nation-Loses-270K-FAFSAs-Since-2019.htm>

<sup>15</sup> <https://formyourfuture.org/fafsa-tracker/>

<sup>16</sup> <https://www.ncan.org/news/456025/Survey-Data-Strengthen-Association-Between-FAFSA-Completion-and-Enrollment.htm>

universal FAFSA policy just finished their first postsecondary academic year. There's a lag on when researchers and policymakers get access to data on their enrollment outcomes. Three academic papers have examined universal FAFSA policies and their effects on postsecondary outcomes:

- Dr. Ellie Bruecker's "An Exploration of Financial Aid Application Patterns and College Access: Three Studies Using High School-Level FAFSA Data" examines high school-level increases in college enrollment based on a school's pre-implementation level of FAFSA completion. Dr. Bruecker finds in part, "a small, but positive increase in college enrollment among schools that experienced the greatest increase in FAFSA completion after the implementation of a mandatory FAFSA policy. This effect is not significantly distinguishable from changes in college-going among schools in the middle two quartiles of FAFSA completion, but it is significantly different from the reference group, schools that experienced the smallest change in FAFSA completion...[T]he reference group experienced a decrease in the college enrollment rate after the implementation of mandatory FAFSA. Thus, while the effect size for Group 1 is 2.9 percentage points, the average college-going rate for this group actually increased by only 0.8 percentage points. Increasing college enrollment to any degree is a positive outcome and should not be discounted. But it is also important that the effectiveness of the policy not be overstated."<sup>17</sup>
- Dr. Jenni Putz's "Making FAFSA Mandatory: An Evaluation of Louisiana's Financial Aid Submission Policy on College Enrollment and Pell Grant Awards" finds "suggestive evidence that students may have substituted away from public two-year institutions towards four-year institutions. Specifically, I find marginally significant effects on enrollment for Black students at large, public four-year universities."<sup>18</sup>
- Dr. Christa Deneault's "College Enrollment and Mandatory FAFSA Applications: Evidence from Louisiana" finds in part "Back of the envelope estimates imply approximately a 1-2 percentage point increase in on-time college enrollment across all schools in my sample. Instrumental variables estimation indicates that increasing FAFSA completion rates 10 percentage points increases college enrollment rates by 3 percentage points. There is suggestive evidence the treatment effects were larger and more concentrated among schools with a larger percentage of free and reduced-price lunch students, and

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<sup>17</sup> <https://www.proquest.com/openview/59a7e3ff01e444dd50c49b28aab66969/1?pq-origsite=gscholar&cbl=18750&diss=y>

<sup>18</sup> [https://jenniputz.com/Putz\\_FAFSA.pdf](https://jenniputz.com/Putz_FAFSA.pdf)

that applications for merit-based scholarships also increased. I find no evidence that high school graduation rates suffered from the additional requirement.”<sup>19</sup>

Notably, and likely to the relief of both supporters and detractors of the policy, neither Bruecker nor Deneault find adverse impacts on high school graduation rates as a result of Louisiana’s universal FAFSA policy.

Beyond universal FAFSA research specifically, there is a significant body of evidence about the impact of early awareness of financial aid.<sup>20</sup> For a student who qualifies for a maximum Pell Grant, which is worth \$7,395 for the current 2023-24 award year, awareness of the financial aid for which they would qualify is equivalent to the promise of a substantial college scholarship. It follows that raising student and family awareness of this fact could shift college-going behavior.

Although researchers, advocates, and policymakers alike would surely like more empirical evidence on these universal FAFSA policies’ effects on students’ postsecondary outcomes, it is clear that these policies do increase FAFSA completion rates in the states where they are implemented and that they raise the profile of a key leading indicator for college enrollment for students, families, and practitioners alike. I hope that these two impacts are contributing and will continue to contribute to the aims of improving postsecondary outcomes, especially for traditionally underrepresented student groups, and creating more equitable attainment rates.

These aims are best served in a policy and practice environment that says “yes, and” to student, family, and practitioner supports. In my estimation, universal FAFSA alone is unlikely to be enough on its own to significantly move the needle on states’ postsecondary attainment goals, but it can be an important piece of the puzzle. Students and families also need, for example, early awareness about college and career options that dispels myths and fills in gaps in college knowledge. They need information about available federal and state financial aid. They need information about the difference between sticker and net price of college and how to interpret award letters to understand what they will really have to pay out of pocket. They need college application support, not just the nuts and bolts but also encouraging and edifying

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<sup>19</sup> <https://www.edworkingpapers.com/ai21-425>

<sup>20</sup> See, e.g., Scott-Clayton, J. (2012). “Information Constraints and Financial Aid Policy,” Long, B.T. (2008). “What Is Known About the Impact of Financial Aid? Implications for Policy,” Page, L.C. & Scott-Clayton, J. (2015). “Improving College Access in the United States: Barriers and Policy Responses.”

messaging that, yes, college *can be* for them, even if they would be the first in their family to go. They need information about the variety of pathways available to them; “college” doesn’t have to mean a four-year residential experience. It can also mean getting a valuable associate degree or high-value credential for an in-demand career. Financial aid can help to offset all of these pathways’ costs, but students need to know that that financial aid exists. Completing the FAFSA, and other college and career readiness programming and resources, provides that knowledge. Beyond all of this, students who commit to a postsecondary pathway often need support to make sure they arrive on-campus ready to succeed. Students also need to arrive on campuses committed to their success where academic, financial, and other supports are available to see students not just to a postsecondary pathway but most importantly *through* one to attainment.

If all of this sounds like a lot to you, imagine how daunting it must be for a student or family navigating the obstacle course that our systems and policies have set before them. For many students and families in many New Jersey communities, asking students about what it takes to go to college is like asking a fish about swimming in water: they’ve always done it, and it’s assumed they’ll keep doing so. But for entirely too many students and families in entirely too many New Jersey communities, the prospect of college is too daunting a fishbowl to jump into; they don’t know if they can swim or how to get into the water. Knowledge about financial aid opportunities provided through FAFSA completion are a good step for those students and families, and we should continue to encourage them to come on in, the water is fine.

Concerns about universal FAFSA policies from some K-12 stakeholders in New Jersey are similar to those NCAN observes in some other states. And, also understandable. Embracing a universal FAFSA policy does not have to mean that high school counselors, who are already facing daunting student-to-counselor ratios, should or have to bear the increased burden of helping students complete the FAFSA alone. My organization, NCAN, has members nationwide that specialize in providing targeted financial aid support to students. Partnerships with college access programs and other community-based organizations as well with colleges and universities and NJHESAA can help to support what could and should be an “all hands on deck” effort. Alongside these partners, New Jersey school districts could provide FAFSA workshops and other programming, personalized financial aid support, and guidance and use universal FAFSA policy as a catalyst to help connect students to college and career pathways.

States, including New Jersey, should consider the policy, practice, and programming choices and options for raising student and family awareness of financial aid earlier, dispelling prevalent myths about who college and financial aid is “for”, connecting students to supportive

community-based organizations, and in general setting high college and career readiness expectations in all communities. These expectations have long been inequitably distributed across both the Garden State and the United States. I believe A1181 and policies like it can be valuable in helping students and families better understand the investments public policy has made to make college pathways more affordable and to putting an emphasis on students' prospects and pathways after crossing the high school graduation stage. In closing, I commend you for advancing this effort and would commend to you not to stop here.



**Improving  
Access to  
Post-Secondary  
Education  
Through FAFSA  
Completion**

**CORNWALL CENTER  
REPORT**

Strategies, Policies,  
and Legislation

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# Executive Summary

## INCREASING ACCESS TO FINANCIAL AID

The Free Application for Federal Student Aid (FAFSA) gives students access to financial aid to pay for college or vocational school. Through the FAFSA, students can apply for federal and state grants, work-study, and loans, as well as private funding. Students who complete the FAFSA are more likely to go to college and persist through graduation. For this reason, districts, cities and states across the country have begun to implement interventions to improve FAFSA completion rates (as of June 2020, completion rates were around 60% nationwide). Mandatory completion policies, which require that students submit the FAFSA in order to graduate high school, are one such tack. However, the COVID-19 pandemic has created a number of barriers including the loss of institutional support for our most vulnerable students. This report seeks to share research on FAFSA completion and successful interventions to improve completion rates.

### What We Know About FAFSA Completion

- The FAFSA is required for students to receive federal student aid, including Pell grants which target low-income families, as well as state and private funding.
- Students not going to college can use the FAFSA to support vocational training.
- FAFSA completion is associated with greater college attendance and persistence.
- Completion rates vary widely among cities, states and districts. In the best performing states, completion rates are over 70%. In the lowest performing, rates are below 50%.
- Low-income and students of color are less likely to complete the FAFSA, particularly during the COVID-19 pandemic.
- In 2018, students left \$2.7 billion on the table in unclaimed Pell grants.
- Later filers (after the June 30 deadline), on average, receive less grant aid.

### Barriers to Completion

- The FAFSA is complicated, though efforts are being made to reduce its complexity.
- Undocumented students are not eligible for federal aid unless they have Deferred Action for Childhood Arrival (DACA) status.
- Some families are selected randomly for verification which can deter completion.
- Students not in face-to-face school during the pandemic may not have access to institutional supports to help with completing the FAFSA.

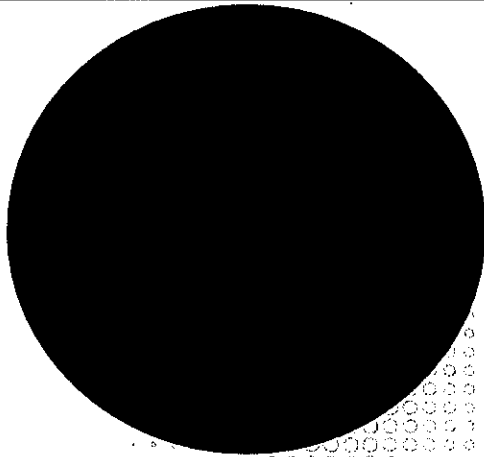
## Strategies That Work

It is important that cities and states develop a cohesive strategy that includes the use of some or all of the following elements:

- Student-level FAFSA completion data
- Cross-sector partnerships
- Strategic outreach
- Capacity building
- Incentives
- FAFSA legislation

## What to Consider with FAFSA Completion Initiatives

- There are currently three states with mandatory completion policies: Illinois, Louisiana, and Texas. Many more, including New Jersey and California, are considering them.
- Exemptions are needed for undocumented students and other special populations.
- School counselors are crucial to the success of FAFSA completion policies and need support also.
- It takes time to implement mandatory completion policies. States/school districts should build in planning time and not institute the policy all at once.



5

## Introduction

The Free Application for federal Student Aid (FAFSA) gives students access to the largest source of financial aid to pay for college or vocational school.

7

## Patterns of Completion

The national FAFSA completion rate is approximately 60%.

16

## FAFSA Completion During COVID-19

Nationally, approximately 81,000 fewer students completed FAFSAs in June 2020 as compared to the previous year, but declines were inequitable.

18

## Emerging Solutions

Review of how cities and states are seeing improvements in their FAFSA completion rates.

31

## Conclusion

FAFSA completion contributes to greater college attendance and persistence to graduation particularly for low-income, part-time, community college, and students of color.

34

## Resources

Listing of important resources for state, city, and local stateholders.

# Introduction

## FAFSA GIVES STUDENTS ACCESS TO THE LARGEST SOURCE OF FINANCIAL AID TO PAY FOR COLLEGE OR VOCATIONAL SCHOOL.

Through completing the FAFSA, students can be considered for federal and private grants, work-study, and loans. In addition, many states and colleges, as well as some private financial aid providers, use FAFSA information to determine students' eligibility for aid.<sup>1</sup> Students not going to college can use FAFSA to support job training at career and technical schools. To complete the FAFSA, families must answer questions about their financial status before the federal deadline of June 30 (see Figure 1). Although the form is often considered overly complex and burdensome to complete, research shows that students who complete the FAFSA are more likely to go to college and persist through graduation.<sup>2</sup> For example, 92% of seniors who completed the FAFSA in 2018 enrolled in postsecondary education by the November following graduation vs. 51% of those who did not complete a FAFSA.<sup>3</sup> The Beginning Postsecondary Student Study found that students who filed a FAFSA had 72% higher odds of persisting through college than their peers who did not file.<sup>4</sup> Lower-income students who filed a FAFSA had 122% higher odds of persisting compared to their lower-income peers who did not file a FAFSA.

While over \$120 billion in financial aid

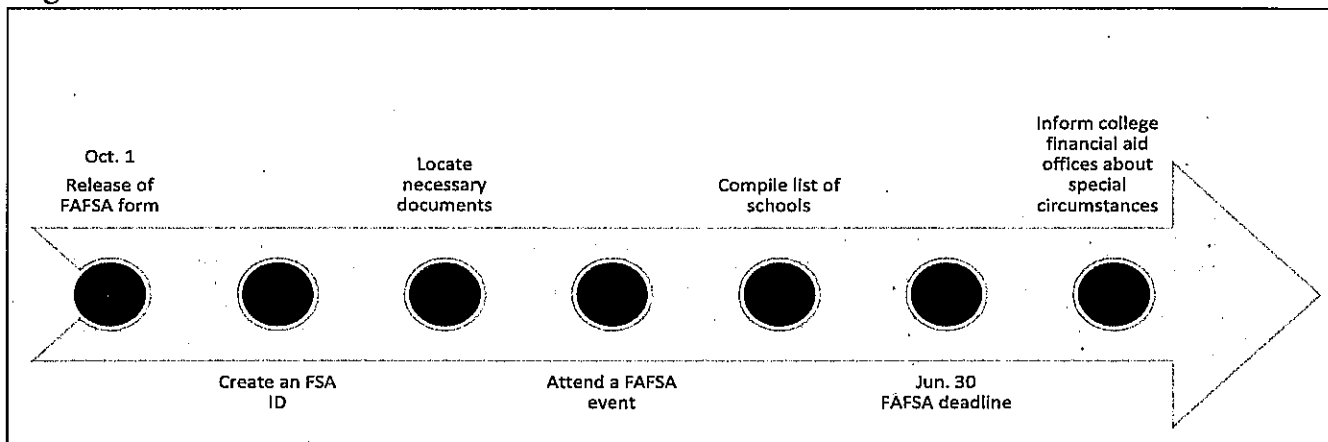
is distributed annually by the federal government, in addition to significant amounts in state and institutional aid, an estimated \$2.6 billion in Pell grants (see Glossary) alone was left unused in 2018 because 600,000 Pell-eligible students did not complete the FAFSA.<sup>5</sup> This is particularly an issue for low-income families of color who are far less likely to complete the FAFSA, and to enroll and persist in college, than their white and higher-income peers. In three-quarters of U.S. states, the average FAFSA completion rate in higher-income school districts surpasses that of lower-income school districts. On average, the gap in FAFSA completion between higher- and lower-income school districts is more than 7 percentage points.<sup>6</sup> This demonstrates that students who are most likely to benefit from access to financial aid are less likely to receive it.

There are numerous barriers to FAFSA completion such as fear of disclosing personal information to the government, lack of access to tax information, the assumption that the FAFSA should only be completed by those going to four-year colleges, the verification process, confusion about submission vs. completion of the form, the COVID-19 pandemic, the uneven support of school counselors, and challenges for undocumented families. A 2018 National Center for Education Statistics (NCES) report found that approximately 65% of students na-

tionwide reported completing a FAFSA.<sup>7</sup> However, only 29% of students in the lowest socioeconomic status (SES) group completed the form. Students gave numerous reasons for not doing so, believing they or their family might be ineligible for financial aid (32%), did not have enough information about how to complete a FAFSA (23%), did not know they could complete a FAFSA (15%), and thought the forms were too much work or too time-consuming (9%). Thirty-four percent of Latinx and 27% of Black students did not complete a FAFSA because they or their family did not have enough information about how to complete it, compared to 18% of white students.

In order to address these difficulties, there have been a number of recent efforts to improve FAFSA completion rates across the country. In this report, we will discuss patterns of FAFSA completion, barriers to completion, and relevant policies and recent legislation.

Figure 1. *FAFSA Timeline*



Source. Adapted from Federal Student Aid. 7 Things You Need Before You Fill Out the 2021-2022 FAFSA Form. <https://blog.ed.gov/2020/09/7-things-need-fill-2021-22-fafsa-form/>

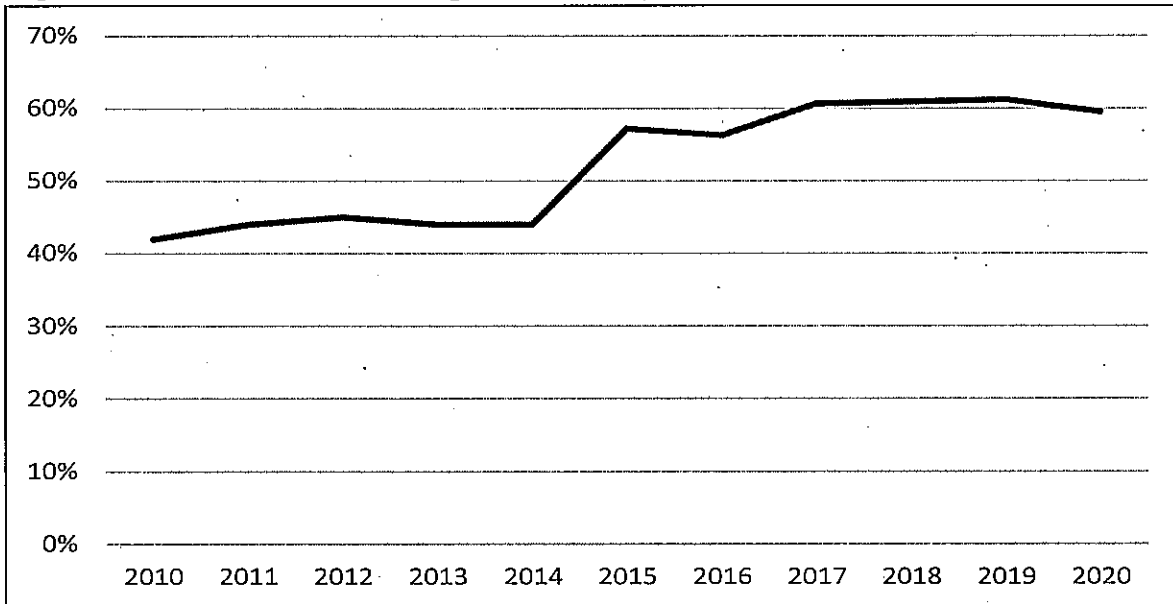
# Patterns of Completion

HERE WE DISCUSS NATIONAL, STATE, AND LOCAL TRENDS IN FAFSA COMPLETION RATES. WHILE SCHOOLS RECORD SUBMISSION AND COMPLETION DATA THROUGHOUT THE YEAR, COMPLETION RATES TYPICALLY REFER TO TOTALS NEAR THE FEDERAL DEADLINE OF JUNE 30.

## National

The national FAFSA completion rate is approximately 60% which represents an increase of about 18 percentage points from 10 years ago (see Figure 2). The national completion rate increased from about 45% in 2015 to a little under 60% in 2016 and has remained consistent at about 60% since 2018 with a slight dip in 2020 most likely due to the COVID-19 pandemic. National FAFSA completion data are compiled by the National College Attainment Network (NCAN).<sup>8</sup>

**Figure 2.** National FAFSA Completion Rate by Year 2010-20



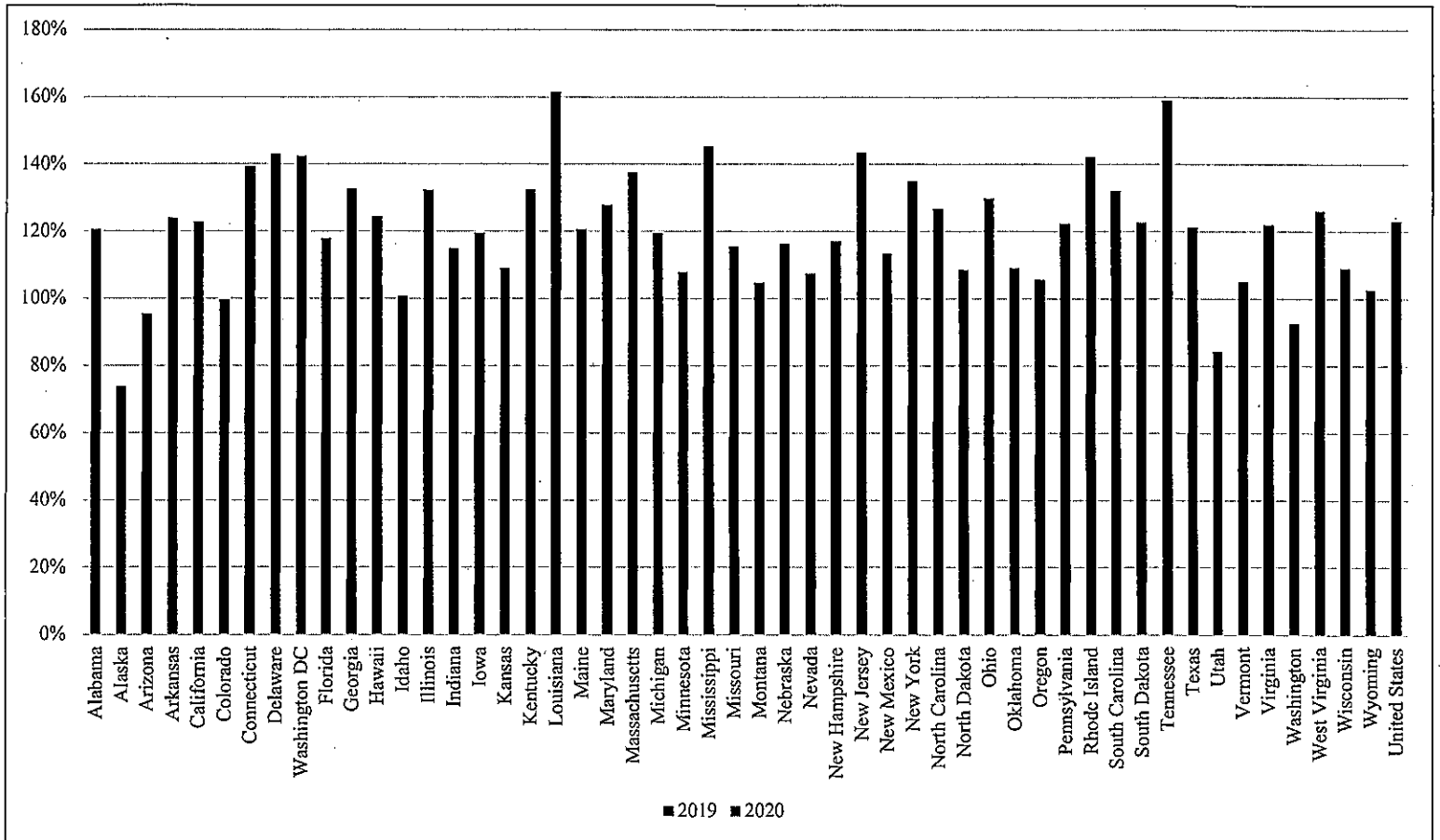
*Source.* FAFSA completion rates retrieved from NCAN <https://www.ncan.org/page/NationalFAFSACompletion-RatesforHighSchoolSeniorsandGraduates> and number of high school graduates retrieved from NCES [https://nces.ed.gov/programs/digest/d15/tables/dt15\\_219.10.asp](https://nces.ed.gov/programs/digest/d15/tables/dt15_219.10.asp)

*Note.* FAFSA completions retrieved by NCAN on or about June 30 of the given academic year. Includes public and private school students. NCAN changed their data source in 2017.

State

In 2019 and 2020, FAFSA completion rates ranged widely across states from approximately 35% to over 80% (see Figure 3). The states with the highest FAFSA completion rates in 2019 were Louisiana (82.6%), Tennessee (80%), Mississippi (74.1%), Delaware (73.1%), and New Jersey (71.93%) as compared to 62% for the U.S. overall. In 2020, Washington D.C. joined the top 5 with a 72.6% completion rate. Importantly, Louisiana had a FAFSA graduation requirement in place and Tennessee, Delaware, New Jersey, and Washington D.C. were engaging in FAFSA completion campaigns. Mississippi and Tennessee also offer robust state aid programs. For comparison, the states with the lowest completion rates in 2019 were Colorado (49.2%), Arizona (47.4%), Washington (46.7%), Utah (42.1%), and Alaska (36.7%).

Figure 3. FAFSA Completion Rates by State in 2019 and 2020



Source: NCAN Form Your Future FAFSA Tracker <https://formyourfuture.org/fafsa-tracker/>

24x

## City

The most recent data available on citywide completion is from 2015. NCAN has not released completion rate data for cities since 2015 because districts can cut across city boundaries, and it can be difficult to attain accurate enrollment figures for cities. Based on available data, we know there is wide variation in FAFSA completion across U.S. cities, from 25% to almost 70% with an average of 48% in 2015. An analysis by NCAN found that completion rates did not correlate with city population size or poverty rate. As seen in Figure 4, Memphis had a FAFSA completion rate of 68% in 2015 with Chicago (61%), Los Angeles (61%), Pittsburgh (61%), and Fresno (60%) close behind. Most cities fell slightly below 50% such as Newark (46%), Columbus (46%), and Des Moines (47%). However, there were some cities in the 25-35% range such as N. Las Vegas (25%), Minneapolis (29%), Jackson (32%), and Anchorage (33%).<sup>9</sup> While these data are unfortunately dated, they give us a sense of how broad the spread is among cities. Further, exemplar cities of various sizes show us that it is possible to have a high percentage of high school seniors complete the FAFSA.

# FINANCIAL AID TIMELINE

## 1965

Higher Education Act established the U.S. federal government as the primary provider of financial aid, created the Federal Family Education Loan (FFEL) program and FAFSA. Title IV established the Educational Opportunity Grant (EOG) Program allocating funds directly to colleges.

## 1972

EOG program was split into the Federal Supplemental Educational Opportunity Grant (FSEOG) program, a program that delivered funds directly to colleges, and the Basic Educational Opportunity Grant (BEOG) program (renamed the Pell grant in 1980), which delivered funds directly to students.

## 1978

Middle Income Student Assistance Act of 1978 opened eligibility for subsidized loans to all undergraduates, regardless of need. It also expanded eligibility for Pell grants to middle-income students.

## 1980

Pell grants were awarded to part-time students as well as to students at vocational or community colleges.

## 1990s

PLUS loans were established, Hope and Lifetime Learning tax credits allowed families to offset educational costs with tax credits and unsubsidized Stafford Loans were introduced.

## 2005

Higher Education Reconciliation Act made changes to student and institutional eligibility and student assistance general provisions under Federal Student Aid Programs.

## 2010

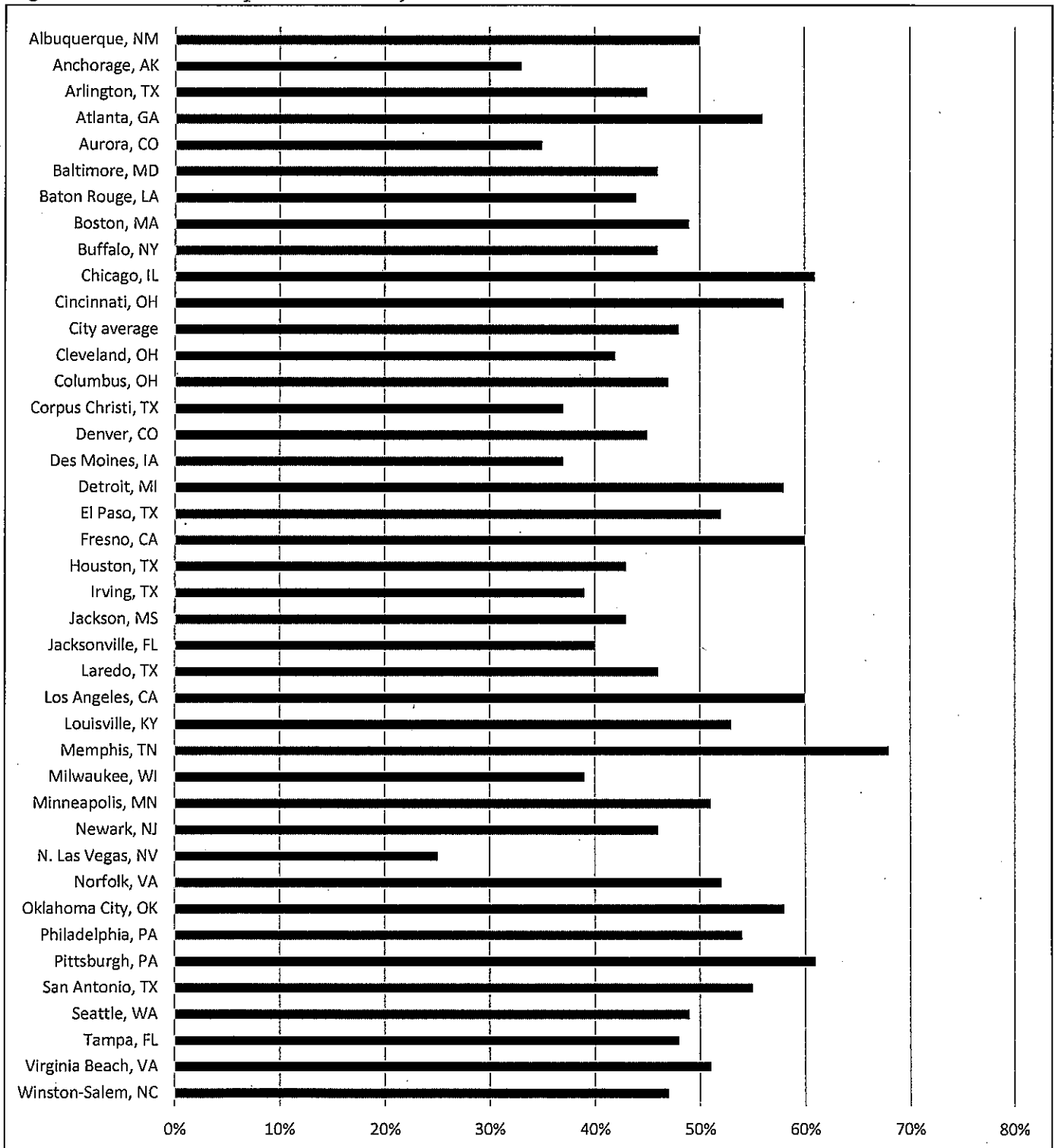
Health Care and Reconciliation Act eliminated the FFEL program for all new loans and savings were used to increase funding for the Pell grant program.

## 2021

Consolidated Appropriations Act cut the number of questions on the FAFSA, renamed the Expected Family Contribution (EFC) the Student Aid Index (SAI), expanded Pell grant eligibility, etc.

*Source.* NASPA. Federal Financial Aid Policy: Then, Now, and in the Future.

**Figure 4. FAFSA Completion Rates by Select Cities in 2015**



Source: NCAN. (2016). Data Snapshot: FAFSA Completion Rates in 68 U.S. Cities for the High School Class of 2015.

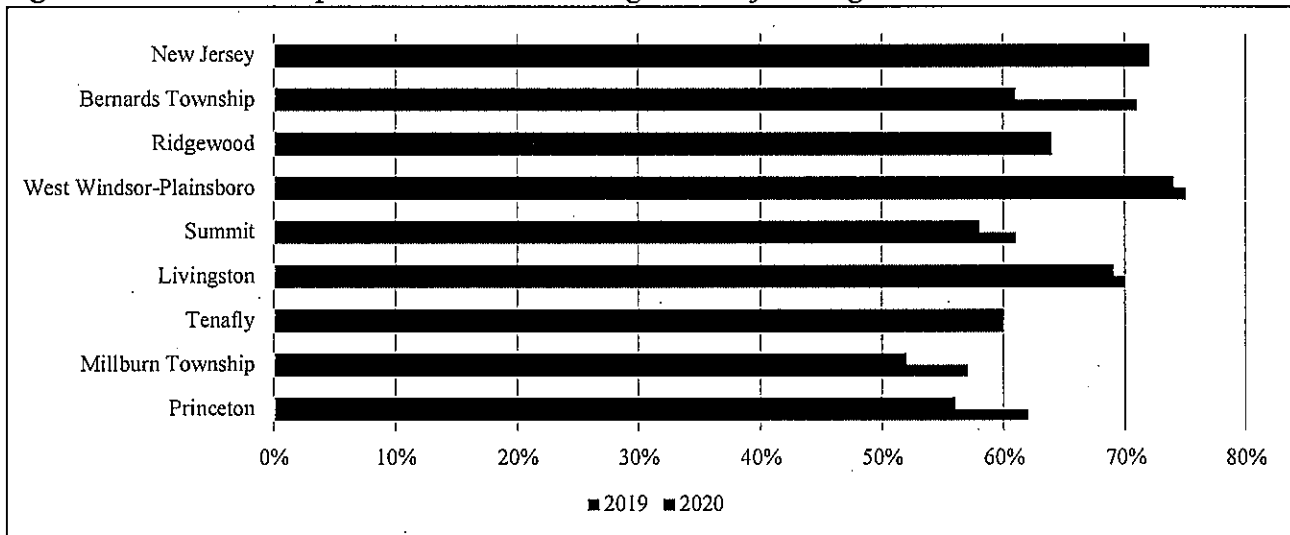
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## New Jersey

New Jersey was #4 in the nation for FAFSA completion in 2019 at 71.93%. However, there is a lot of variation among New Jersey districts. FAFSA completion rates in some states, like Kentucky, Montana, Texas, and Arizona, are about the same across school districts regardless of poverty percentile. In New Jersey, however, completion varies widely. Districts in the 10<sup>th</sup> poverty percentile (lowest poverty) report average FAFSA completion rates of about 70%, while districts in the 90<sup>th</sup> poverty percentile (highest poverty) average about 55%.<sup>10</sup>

Research demonstrates that, on average, there is a negative relationship between high school FAFSA completion rates and school district poverty. Generally, the higher the rate of poverty for 5- to 17-year-old children in a particular school district, the lower the FAFSA completion rate for that district.<sup>12</sup> As seen in Figure 5, the highest performing districts in New Jersey all had FAFSA completion rates above 50% in 2019, though completion ranged from 52% in Millburn Township to 75% in West Windsor-Plainsboro. These districts have median household incomes above \$135,000 (one exceeds \$225,000) and are also predominantly white and Asian.<sup>13</sup>

**Figure 5. FAFSA Completion Rates in the Highest Performing NJ Districts, 2019 and 2020**

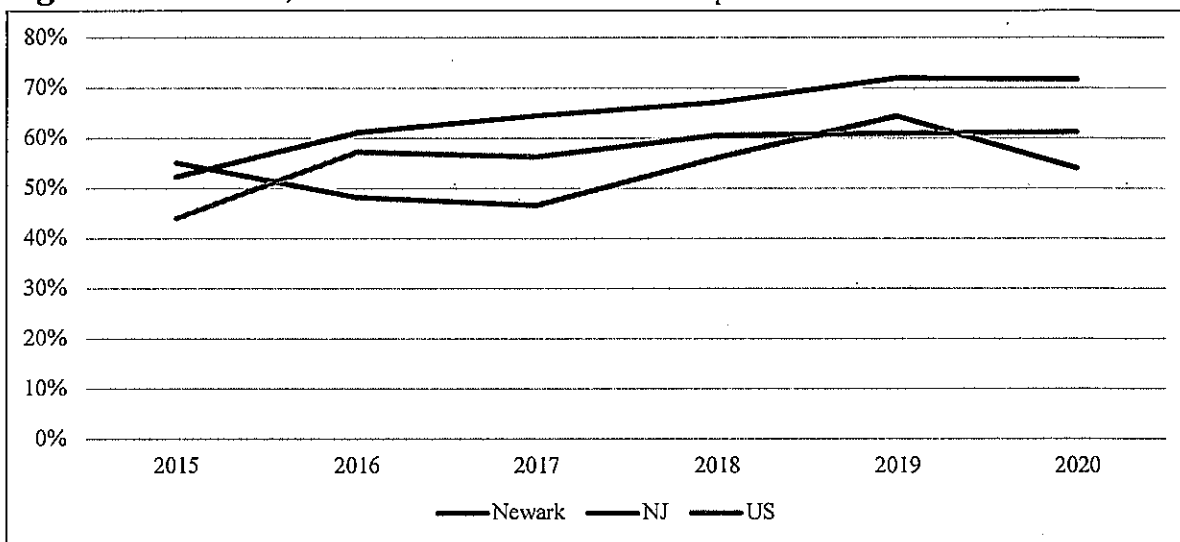


Source. Federal Student Aid data <https://studentaid.gov/data-center/student/application-volume/fafsa-completion-high-school>, NJDOE enrollment data <https://www.nj.gov/education/data/enr/>

Note. These are our estimates based on NJDOE and Federal Student Aid data.

As seen in Figure 6, New Jersey's FAFSA completion rate has exceeded the national average for the past five years. The completion rate for Newark, New Jersey's most populous city, was 53% in 2019. Newark's FAFSA completion rate—which includes comprehensive, magnet, county, and charter high schools—has trended slightly below the national (61%) and state (72%) average, but it has improved over time and parallels statewide trends.<sup>14</sup> Newark's completion rate had a slight dip in 2016 and 2017, then rose to almost meet the national average in 2018. In fact, analysis by NCAN in 2018 found that Newark Public Schools had higher FAFSA filing than what was predicted from regression models based on the percent of children living in poverty.<sup>15</sup> FAFSA completions in Newark fell precipitously in 2020, most likely due to the COVID-19 pandemic.

**Figure 6. National, State and Local FAFSA Completion Rates 2015-2020**



Source. Federal Student Aid data <https://studentaid.gov/data-center/student/application-volume/fafsa-completion-high-school>, NJDOE enrollment data <https://www.nj.gov/education/data/enr/>

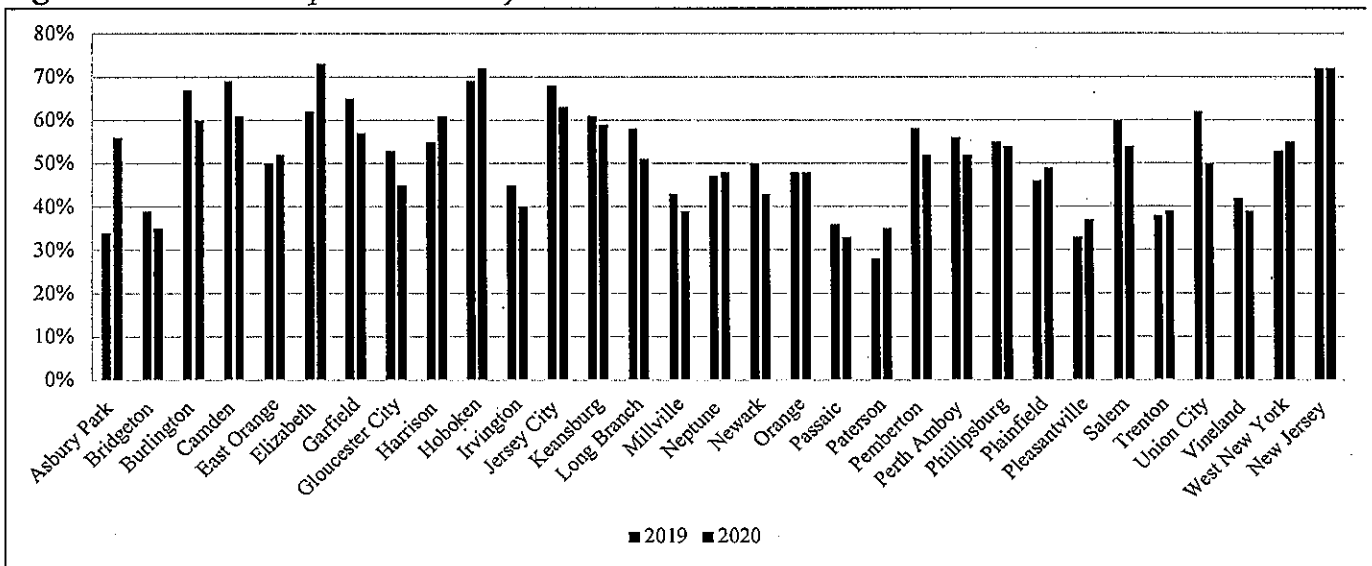
Note. Newark includes comprehensive, magnet, county, and charter high schools. Does not include parochial schools. These are our estimates based on NJDOE and Federal Student Aid data.

### Abbott/New Jersey SDA Districts

Abbott districts, also known as New Jersey Schools Development Authority (SDA) districts, are 31 low-income, urban school districts. To ensure the children in these districts receive a “thorough and efficient” education, as required by the New Jersey Constitution, the New Jersey Supreme Court has mandated a set of comprehensive improvements, including adequate K-12 foundational funding, universal preschool for all 3- and 4-year-olds, supplemental or at-risk programs and funding, and school-by-school reform of curriculum and instruction.<sup>16</sup>

There is some variation among Abbott districts in terms of median income and percent minority enrollment, as well as FAFSA completion rates. Hoboken is an outlier in that its median income of \$127,523 is far above the state average of \$71,637, whereas districts like Camden, Orange, Pleasantville, and Salem fall far below that at a range of \$25,000-\$40,000. As seen in Figure 7, nine Abbott districts had completion rates above 60% in 2019: Camden (69%), Elizabeth (62%), Garfield (65%), Hoboken (69%), Jersey City (68%), Keansburg (61%), Salem (60%), and Union City (62%), with four—Camden, Garfield, Hoboken, and Jersey City—hovering just below the state average. While more than half of Abbott districts had completion rates above 50%, five districts had completion rates in the 30% range: Asbury Park (34%), Bridgeton (39%), Passaic (36%), Pleasantville (33%), and the state capital of Trenton (38%). These data underscore the wide range of completion among New Jersey’s highest-need, urban districts. They also show us where FAFSA completion initiatives are most needed, which is especially important since we know that, nationally, students in the lowest income quintile who complete a FAFSA are 127% more likely to immediately enroll in college than those who do not complete a FAFSA.<sup>17</sup>

**Figure 7. FAFSA completion rates by Abbott Districts in 2019 and 2020**



Source. NCAN Form Your Future FAFSA Tracker <https://formyourfuture.org/fafsa-tracker/>, NJDOE enrollment data <https://www.nj.gov/education/data/enr/>

Note. Does not include private or parochial schools. These are our estimates based on NJDOE and Federal Student Aid data

29x

## Barriers to Completion

The FAFSA can be difficult for families to complete. The application requires that they provide an array of information about their income, assets, and family composition, which can act as a substantial barrier for many low-income families.<sup>18</sup> In addition, there are a number of details that families may not be aware of that can impact the amount of students' awards. For instance, the FAFSA must be sent to each postsecondary institution that a student applies to. However, 45% of high school seniors who complete the FAFSA send it to just one college, even though more than half of these students applied to two or more institutions.<sup>19</sup> As a result, students may not receive financial aid packages from all the institutions that accept them, which limits students' ability to comparison shop among schools. It should be noted that in December 2020, the number of questions on the FAFSA was reduced from 108 to no more than 33. The requirement for registering for selective service and some of the more intrusive questions were also removed.<sup>20</sup>

## FAFSA Submission vs. Completion

Students become eligible for financial aid only when the FAFSA is certified as complete by the U.S. Department of Education (USDOE)—meaning all questions have been answered, the form has been signed by a parent or guardian and, if necessary, the student completes a verification process certifying that the information provided is correct. In the past two FAFSA cycles (2019 and 2020), about 5.9% of FAFSAs submitted by twelfth graders nationwide were never completed. Submitted FAFSAs are most often incomplete because they lack necessary signatures from a parent or guardian. This is most often completed online and requires that parents provide their email address and their child's Social Security number, which can prove difficult for low-income and undocumented families who may not have internet access, a Social Security number, or feel comfortable sharing that information.<sup>21</sup>

Even students who are successful in filing the FAFSA while in high school can struggle to refile during their freshman year in college. The FAFSA must be submitted each year the student is enrolled in postsecondary education to receive financial aid. The FAFSA is released on October 1 each year, so college freshmen would ideally refile during their first semester—an additional burden as they navigate the first few months of their postsecondary education. Failure to renew the FAFSA is negatively associated with persisting in college or eventually earning a degree.<sup>22</sup>

## FAFSA Verification

Many students who successfully complete the FAFSA before the deadline are required by the USDOE to verify the income and asset information they provide on their application.<sup>23</sup> Most students who are selected to go through FAFSA verification are chosen randomly by the USDOE, but some schools may request that students' information be verified. The Education Department has not publicly shared their methodology for the selection process for verification. While the process is intended to prevent fraud, students from low-income families and from majority Black and Latinx neighborhoods are disproportionately selected for verifica-

tion, and the timing of the request and step of submitting additional paperwork leads many students to abandon the FAFSA altogether.<sup>24</sup> For example, about a third of total applications were selected for verification in the past 10 years. While applications from Black-majority Zip codes made up 4% of the total, the rate at which these communities were reviewed was, on average, 1.8 times higher than the rate in white-majority neighborhoods.<sup>25</sup> Applications from majority-Latinx communities were reviewed on average 1.4 times higher than applications from majority-white Zip codes. Analysis of federal data by NCAN found that when the USDOE selected fewer students in the 2019-2020 FAFSA cycle, it actually prevented more improper payments than the prior cycle, suggesting high audit rates were inefficient. In November 2020, the USDOE announced it would reduce the percentage of federal student aid applicants it would select for verification. In the past, the federal government has verified about 30% of all aid applications in each enrollment cycle but starting in 2020-21, it will verify 18%.<sup>26</sup>

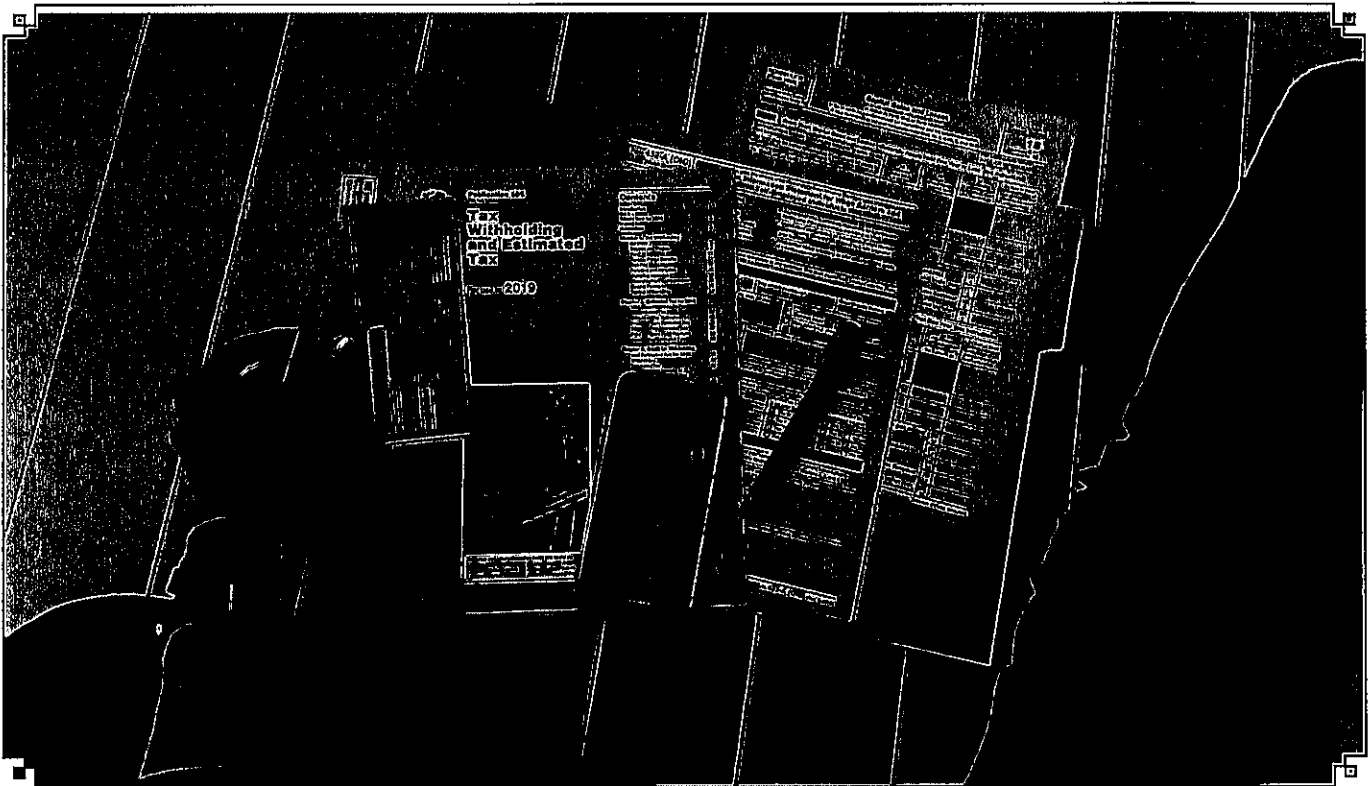


Photo by Kelly Sikkema on Unsplash

## FAFSA COMPLETION DURING THE COVID-19 PANDEMIC

These barriers are even more critical during the COVID-19 pandemic. Nationally, approximately 81,000 or 3.7% fewer students completed FAFSAs in June 2020 as compared to the previous year, but declines were inequitable such that high schools with more students of color (-14.1%) and from low-income (-12.1%) and urban (-11.1%) backgrounds saw larger decreases. For the class of 2021, FAFSA completions were down a significant 17% in November 2020 with a disproportionate impact on low-income students of color because they are lacking institutional support.<sup>27</sup> Thus, it is crucial that schools and organizations work to support students with completion so that they stay on postsecondary pathways. For the high school class of 2020, fall postsecondary enrollment fell 7% overall, but declines were also distributed inequitably among high schools with more students of color (-9.4%) and from low-income (-10.7%) or high poverty (-11.4%) backgrounds.<sup>28</sup> The Latinx population in particular has demonstrated gains in college attendance in recent years but in 2020, there was a staggering 28% decrease in first-time enrollment in community colleges, which is largely financially driven.<sup>29</sup> This inequity will only widen without institutional support for FAFSA completion in low-income communities of color.<sup>30</sup>

A September 2020 article in the New York Times stressed that the pandemic has actually increased the importance of filing early for financial aid because many families have suffered economically and may have to take extra steps to qualify for maximum financial assistance. The 2020-2021 FAFSA uses financial information from the 2019 tax year but many students and families have been negatively affected by the health crisis. Thus, 2019 tax returns may not accurately reflect a student's current financial picture, which could affect his or her eligibility for need-based grants and scholarships. There is a remedy, though. NCAN recommends that families contact college financial aid offices to alert them to their situation and request a "professional judgment." Families can submit new information like layoff notices, unemployment checks, or medical bills to give financial aid officials a more accurate picture of a family's current finances. With that review, financial aid administrators have the discretion to make adjustments to the FAFSA so that students can qualify for more aid. The process can be time consuming, as students must contact the financial aid office of each college they're applying to but is critical for many families experiencing financial hardship.<sup>31</sup>

## Overburdened and Underresourced School Counselors

Counselors in schools serving disadvantaged students may not have the time, resources, or specialized training to assist students with FAFSA completion. Thus, students in states with mandatory completion policies may be directed to complete opt-out waivers if they and their family struggle to complete the FAFSA on their own. This could result in the unintended consequence of low-income families, who stand to gain the most from mandatory completion policies, actually being left further behind. During the COVID-19 pandemic, school counselors have been unable to reach students as readily because students have not been physically present in school everyday. Counselors are also tasked with other duties related to the pandemic such as tracking down students who miss class, providing mental health services, and helping families access technology, internet, and other resources necessary for virtual learning.<sup>32</sup> Further, the pandemic has disrupted many hands-on, in-person events that schools often hold to support families in completing the form. For these reasons, the supports that states provide are central to the success of any mandatory FAFSA policy proposal.<sup>33</sup>

## Burdens on Undocumented Families

Undocumented students encounter a number of unique challenges with FAFSA completion. Applying to college is the first time many students realize that their legal status directly impacts their ability to access resources (e.g., financial aid) since such access is often determined by citizenship and legal residency. There is a great deal of misinformation about the financial aid process and, without accurate, timely information and supports, undocumented students are often left with the impression that they are unable to afford college. There is also mistrust on the part of many undocumented parents about how the FAFSA could be used against them or their children. Due to their immigration status, undocumented students are not eligible for federal aid like the Pell grant. A Social Security number is necessary to complete the FAFSA and most undocumented students are not eligible for one. However, Deferred Action for Childhood Arrival (DACA) students with a Social Security number can complete the FAFSA.<sup>35</sup> Thus, undocumented students may be counseled by school staff to apply for DACA status prior to completing the FAFSA. In addition, undocumented students may be eligible for state or college financial aid as well as private scholarships. In some states, including New Jersey, DACA students are eligible to receive in-state tuition.<sup>37</sup>

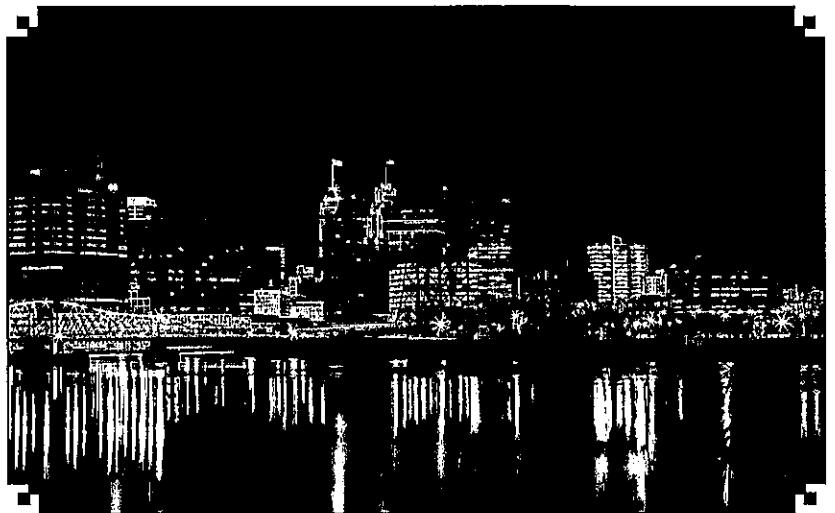


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# Emerging Solutions

**SOME CITIES AND STATES HAVE BEGUN TO SEE IMPROVEMENTS IN THEIR FAFSA COMPLETION RATES. THIS SECTION INCLUDES A DISCUSSION OF EFFECTIVE STRATEGIES AS WELL AS LEGISLATION AND POLICIES THAT HAVE BEEN ENACTED.**

## FAFSA Completion Strategies

There are a number of effective approaches that have come out of FAFSA completion efforts. It is important that cities, states, and districts develop a cohesive strategy that includes the use of some or all of the following elements: (1) student-level FAFSA completion data, (2) cross-sector partnerships, (3) strategic outreach, (4) capacity building, (5) incentives, and (6) FAFSA legislation.

**Data.** It is critical that schools and districts access and use timely student-level FAFSA completion data to track and target students and families who need assistance with the form. Most states receive student-level FAFSA completion data from the USDOE's Office of Federal Student Aid (FSA). Many states distribute that information to school districts, some distribute it to high schools, and a few share it with counselors and other partners to track which specific students have completed a FAFSA. Even if a state gets those data from FSA, there is no guarantee that the information will make its way to the district or school level.<sup>38</sup> If counselors and college advisors are able to access the data, they can more efficiently and effectively target their outreach to students and families, including those who are likely to need help completing the FAFSA, those who have not yet completed it, and those who started but did not finish or submit their applications.

It is also important to ensure that data systems are aligned and accessible. Most states engaged in FAFSA completion efforts have trackers in place that are accessible to school counselors so that they can see where their school falls amongst other schools in the state. State agencies can then target their support to the districts that most need it. States, districts, and schools should report progress on completion efforts regularly and transparently.<sup>39</sup> In addition, ongoing assessment and adjustment are needed in order to ensure effective implementation of FAFSA completion initiatives.<sup>40</sup> It is critical that states, districts, and individual schools regularly track progress, overcome barriers with creative solutions, and change approaches when necessary. When sites are resilient and resourceful, they can consider multiple viewpoints, including the student perspective, when deciding how to move forward.

**Partnerships.** Cross-sector partnerships are also key to FAFSA completion efforts. Partnerships can be formed between schools and local community organizations that provide on-the-ground training and support, such as legal centers for undocumented families, volunteers to assist families with completing the form, and community-wide events. It is important that there is a feeling of shared ownership of FAFSA completion across K-12 and higher education such that local community colleges, four-year colleges, and trade schools also partner

in this effort.<sup>41</sup> Cities such as Baltimore, MD; Rochester, NY; and West Valley City, UT, have engaged in citywide campaigns which allow for the message of FAFSA completion to come from different parts of the community and meet families where they are.<sup>42</sup> Partners must engage in core committee planning on a regular basis to ensure effective implementation of FAFSA completion efforts as well. They can stay in touch through a variety of communication methods, including social media, email, and Zoom meetings.

**Outreach.** FAFSA completion outreach can take many forms. For example, one-on-one assistance with both students and parents has been found to be effective. This advising should be “intrusive and intentional.”<sup>43</sup> Rather than waiting for students to seek assistance, FAFSA advisors should proactively identify students who are likely to need FAFSA assistance, find them during the school day, and help them complete the form. This can also be done at FAFSA completion events at the school or in the community during evenings and on weekends and even online or over the phone. Some schools such as those in Val Verde, CA, also provide direct outreach in which school staff personally call *each* senior who has not completed a form to provide assistance.

In addition, peer and near-peer advising, in which current college students help raise awareness about the FAFSA with high school seniors, is often a valuable way to motivate students to complete the form and begin to think about postsecondary plans.<sup>44</sup> Some cities, such as Mesa, AZ, give peer advisors financial rewards for helping a certain number of students complete the FAFSA. Peer advisors are often trained to provide FAFSA assistance and share their stories with students to show the impact of getting financial aid and com-

pleting college.

Schools and organizations have also had success using social media such as Facebook groups to get the word out about FAFSA completion. Counselors or “FAFSA cheerleaders” in Denton, TX, posted pictures of students who completed the FAFSA on the school website.<sup>45</sup> Regular reminders or “nudges” via text or automated phone messages have proven effective.<sup>46</sup> Assistance can also be provided outside of the school such as at H&R Block when families are completing their taxes.<sup>47</sup> It is important to remember that students often need assistance after they have completed the FAFSA when they are making decisions about college and financial aid offers.

Cities and states should develop a marketing strategy to share the completion goal broadly with districts, schools, and families. It is recommended that cities, states, and/or districts create a toolkit for schools to inform families about the importance of the FAFSA and that resources are clear and easily accessible on organization websites. For example, Puget Sound College & Career Network in

## Emerging Solutions

STUDENT-LEVEL FAFSA COMPLETION DATA

1

CROSS-SECTOR PARTNERSHIPS

2

STRATEGIC OUTREACH

3

CAPACITY BUILDING

4

INCENTIVES

5

FAFSA LEGISLATION

6

Washington state developed a financial aid toolkit featuring student materials, family letters, lesson plans, and promotional materials.<sup>48</sup> Districts can use resources provided by NCAN to spread the word and generate excitement about FAFSA completion among students and their parents and distribute promotional items such as t-shirts and fans at schools and athletic events as well.

**Capacity building.** It is essential that there are trained experts in communities to support students and families with the FAFSA. These experts often include school counselors but can also be teachers, administrators, school-based staff, local college students and staff, and community-based volunteers. It is important that school and district leadership is engaged in this issue. They can make the case for a FAFSA completion goal, champion the cause, and help bring partners together to do the work.<sup>49</sup> It is imperative to seek out cross-sector volunteers. This can be done by establishing partnerships with organizations that have robust experience. Regardless of who provides support with the FAFSA, they all need rigorous and specific training about the importance of the FAFSA as well as the mechanics of filling out the form—particularly for special populations such as undocumented families. It can be valuable to engage partners to work with school counselors who are often overwhelmed with large caseloads. States might also consider launching online modules, developing turnkey resources for districts to lead in-person training sessions and communicate with families, or providing incentive funding for districts to create their own training resources.

**Incentives.** In addition to providing information about the FAFSA and its importance, it can be necessary to motivate students, families, and schools to complete it. Many cities and states like Washington D.C. have set up competitions or challenges with prizes such as trophies, “bragging rights,” and additional funding for schools.<sup>50</sup> They provide monthly awards that recognize schools with the highest FAFSA completion rates and online leaderboards that track progress, all of which can generate excitement and add urgency to the cause. Some states and cities have also provided vouchers or raffle drawings to students who complete their FAFSAs.<sup>51</sup> Non-financial incentives, such as cords or tassels that students wear during graduation ceremonies to signify FAFSA completion, are also powerful motivators.

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**Legislation.** Lastly, many states are enacting legislation on FAFSA completion which will be discussed in greater detail below. Some states have found that a mandatory policy has been important to improve completion rates but others have been able to do so without such re-

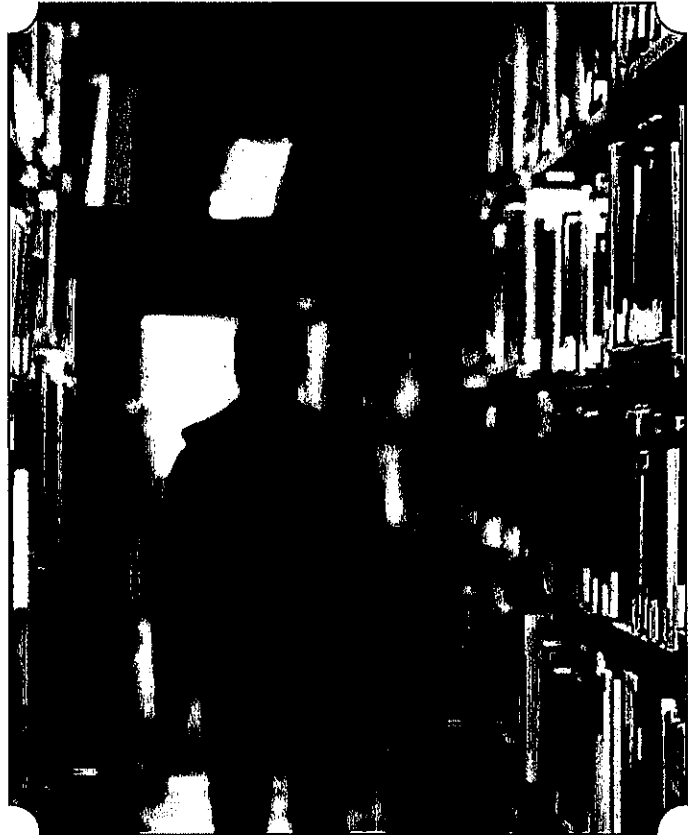


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quirements. Effective FAFSA completion legislation is not rushed and allows time for planning after being passed. Mandatory polices provide waivers for those who are unable or unwilling to complete the FAFSA such as undocumented students. States should start by setting an ambitious, yet realistic goal for increasing FAFSA completion which can be statewide, regional, or targeted towards schools and districts. They can then partner up with state financial aid organizations to administer support. In some cases, FAFSA legislation is linked to state aid and funding programs as well.

### **Non-mandatory FAFSA Completion Initiatives**

Tennessee and Washington D.C. have implemented successful FAFSA initiatives without making them mandatory.

#### **TENNESSEE**

Tennessee's FAFSA Frenzy initiative has been very successful and used a number of effective strategies. Since 2015, the state has seen steady improvements in its FAFSA completion rates. In five years, the state's rate has increased approximately 20 percentage points. Tennessee achieved a completion rate of over 77% in the 2019-2020 school year, making it #2 in the nation (behind Louisiana, at 79%). The intentional cross-sector partnerships, aligned communications, and strategic use of state and federal dollars to increase capacity have helped Tennessee dramatically expand students' access to postsecondary education. The initiative comes out of a partnership between the Tennessee Higher Education Commission (THEC), Tennessee Student Assistance Corporation (TSAC), Tennessee Department of Education (TDOE), and non-profit college access organizations.

TSAC was created by the Tennessee General Assembly in 1974 as a non-profit corporation with the merging of the Tennessee Educational Loan Corporation and the Tennessee Tuition Grant Program. It administers over 20 different financial aid programs, including the HOPE scholarship, Tennessee Promise, Tennessee Reconnect, Tennessee Student Assistance Award, and the Dual Enrollment grant. To increase awareness and participation in the financial aid programs, TSAC conducts financial aid outreach and training to students and staff at every high school and postsecondary institution in the state. Staff also consult with postsecondary financial aid offices to improve program effectiveness, compliance, and efficiency.<sup>52</sup> The corporation deploys regional outreach specialists to work directly with principals and school counselors to provide trainings, host FAFSA nights, and coordinate with advisors from college access organizations across the state. Advisors and coaches from non-profit college access organizations provide direct support to students and families through the application process.<sup>53</sup>

It is also important to mention that Tennessee is one of the few states to offer two years of free tuition to any of the state's community colleges or colleges of applied technology, as well as a handful of four-year universities. There are no income requirements or GPA requirements. Students must have graduated from a Tennessee high school or earned a GED prior to their 19<sup>th</sup> birthday and lived in the state for at least one year. Eligible non-citizens may also receive an award.<sup>54</sup> In the first year of this policy, first-time, full-time college enrollment rose 11.4% with gains concentrated in two-year community and technical colleges. However, the community college completion rate in Tennessee was only 28% in 2018 (compared with less than 40% nationwide), suggesting there is still more work to be done.<sup>55</sup>

## WASHINGTON, D.C.

Washington, D.C. was #3 in the nation in terms of FAFSA completions at 72.6% in 2020. The Washington D.C. FAFSA Completion Initiative encourages schools and community-based organizations to set a FAFSA completion goal to increase the proportion of their high school seniors who complete the FAFSA by 3% from the prior year. The initiative runs from October 1-June 30 and is open to all traditional public and charter high schools in the District as well as interested community-based organizations. While many schools and community-based organizations in D.C. have already begun working to boost FAFSA completion rates, this initiative recognizes their achievements and supports their efforts through a FAFSA Portal, D.C. FAFSA Completion Initiative Toolkit, and D.C. FAFSA Completion Awards.<sup>56</sup>

The Office of the State Superintendent of Education (OSSE) celebrates the progress and success of all traditional public and charter schools and community-based organizations that make significant gains in FAFSA completion by identifying three of the most successful sites. They include “MVPs” or those who have the highest FAFSA completion rate through the June 30 deadline, “Most Improved” or those who have improved their FAFSA completion rate the most compared to the previous year, and “Biggest Boost” or those with the largest week-to-week improvement in FAFSAs completed. Winners in each of these categories win a trophy and are publicly celebrated by OSSE via a press release, social media, and its website.<sup>57</sup>

Formerly known as College Summit, PeerForward began as a single workshop in the basement of a Washington, D.C. community center. Its mission is to unleash the power of positive peer influence to transform the lives of youth living in low-income communities by connecting them to college and careers. More than two decades later, founders J.B. Schramm, Keith Frome, and Derek Canty built a national organization that has guided more than 350,000 students across the nation to higher education. Through their student-driven PeerForward model, they train, deploy, and coach a team of Peer Leaders who are charged with boosting college preparation and enrollment across their entire school.<sup>58</sup>

## Mandatory FAFSA Completion Legislation and Policies

Mandatory legislation and policies are another strategy aimed at improving FAFSA completion. Currently, Illinois, Louisiana, and Texas have implemented mandatory or “opt in” FAFSA completion policies for all graduating seniors. Louisiana was the first state to enact such a policy and has seen positive outcomes in terms of completion, high school graduation, and college enrollment. Illinois and Texas are just beginning to enact their policies. A number of other states including New Jersey and California are also considering similar policies (see Figure 8).<sup>59</sup>



## LOUISIANA

In December 2015, Louisiana approved a policy that sought to increase student access to state and federal financial aid by requiring graduating seniors to either complete the Taylor Opportunity Program for Students (TOPS) application or the FAFSA. TOPS is a scholarship program for Louisiana residents who attend in-state postsecondary institutions; undocumented students are unable to apply.<sup>60</sup> While the FAFSA completion policy was passed in 2015, it was not made effective until the start of the 2017-2018 school year to allow for planning.<sup>61</sup> This policy was designed in part to increase access to funding for vocational training as well as traditional two- and four-year colleges.<sup>61</sup> The policy states that seniors at public high schools must as a requirement for graduation complete the FAFSA, submit an opt-out waiver, or be waived from the requirement. Students who are ineligible for federal financial aid may satisfy the requirement by submitting an application for state financial aid. Importantly, a recent Century Foundation report found that no student had ever failed to graduate on account of the policy in Louisiana.<sup>62</sup> Former Louisiana State Superintendent of Education John White stated that this is a system in which opting in is the default; opting out is the exception, but is readily available to those who want it. It is not really necessary for every student to complete the FAFSA for the policy to be effective because it opens up a discussion about postsecondary plans.

Prior to this legislation, Louisiana had one of the lowest percentages of students completing the FAFSA. After the state rolled out the requirement, over 77% of high school seniors completed the form, up from roughly 26% the year before.<sup>63</sup> In 2019, Louisiana led the U.S. with a completion rate of 79% overall and a public school submission rate of 85%.<sup>64</sup> During the 2019-2020 academic year, Louisiana saw FAFSA completions climb by more than 25%. Additionally, the state has seen a higher high school graduation rate and a boost among those attending college after graduation since enacting the policy in 2017-2018. Before the policy went into effect, 1 in 3 public high schools had a FAFSA completion rate of at least 65% and after, 4 in 5 high schools do. The FAFSA completion gap separating high-income districts from low-income districts also closed, from 8.5 percentage points to 1.1 percentage points in just one year.<sup>65</sup> The 2018 graduation rate for Black students was above the national average for the first time. They saw a jump of 5.1 percentage points to 78%. Low-income students saw their graduation rate rise by nearly three percentage points as well.<sup>66</sup> While school districts attribute this rise to the FAFSA completion policy, it is possible that there were other contributing factors. A gap remains in FAFSA completion for students with limited English proficiency. Importantly, we do not yet know anything about any relationship the new FAFSA

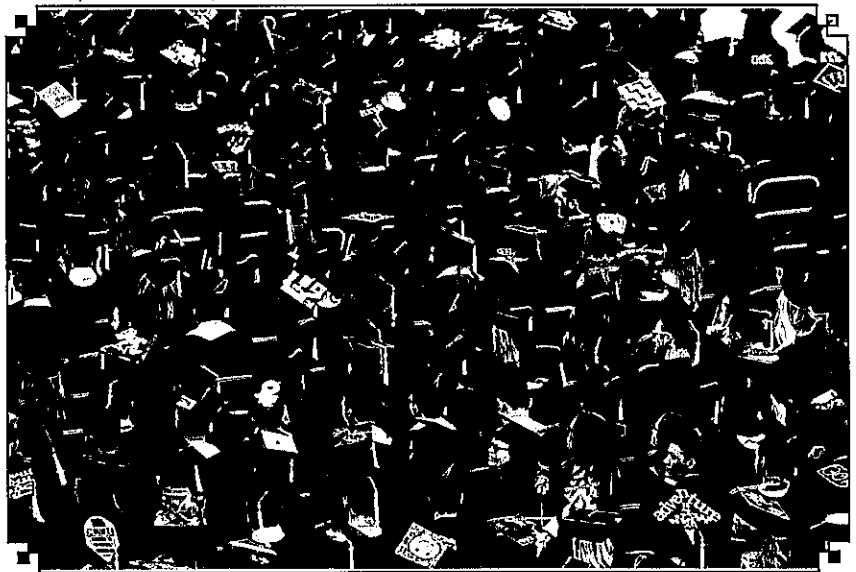


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policy might have to college persistence. According to an analysis by the Century Foundation, Louisiana's performance was generally stronger in the second year of the policy compared to the first. FAFSA completion, Pell grants received, the submission-completion gap, and FAFSA completion gaps by race and income all improved from the first year to the second.<sup>67</sup>

Louisiana used a multipronged approach to FAFSA completion backed by funding from the Kresge Foundation. The Louisiana Office of Student Financial Assistance (LOSFA) focused on collaborative efforts, providing wraparound services, and developing a strategy to engage students and parents. LOSFA worked one-on-one with students during the school day and with parents in the evening on completing separate portions of the application. It also launched a peer support program called the FAFSA Ambassadors where current college students assisted high school seniors in completing the form. In addition, the organization used automated phone messages to remind parents about completing the form. It offered financial vouchers for students to purchase items like a graduation cap and gown if they completed the form. LOSFA found that it needed to assist students even *after* the FAFSA was submitted because many needed support with making sense of financial aid offers when deciding on a college or vocational training.<sup>68</sup>

## ILLINOIS

In 2018, Illinois ranked 10th nationally in percent of seniors completing a FAFSA (63.3%). The following year, Illinois became the second state to require FAFSA completion for high school graduation. The policy is slated to go into effect during the 2020-2021 academic year. As with the Louisiana policy, Illinois allows for students to easily receive waivers for the graduation requirement. Specifically, the policy allows students to "file a waiver with the student's school district indicating that the parent or guardian or, if applicable, the student understands what the FAFSA and application for State financial aid are and has chosen not to file an application."<sup>69</sup> Additionally, a school district must award a high school diploma to students who cannot meet the new requirement because of "extenuating circumstances, as determined by the school district" so long as "the student has met all other graduation requirements" and "the principal attests that the school district has made a good faith effort to assist the student or, if applicable, his or her parent or guardian in filing an application or a waiver."<sup>70</sup>

However, there are some differences in how the policy will be implemented. Illinois differs from other states in its clear expectation of schools' roles in mandatory FAFSA implementation. It requires rigorous school support, which is different from other states. Its law states that school districts "must provide to each high school student and, if applicable, his or her parent or guardian any support or assistance necessary to comply with [the policy]." The Illinois Student Assistance Commission (ISAC) helps support high schools with their financial aid application completion programming and also provides free direct assistance to students and families in completing their financial aid applications. Through this free service to districts and schools, ISAC is able to share data with local school districts on a weekly basis to identify students who have not filed a financial aid application (the FAFSA or the Alternative Application for Illinois

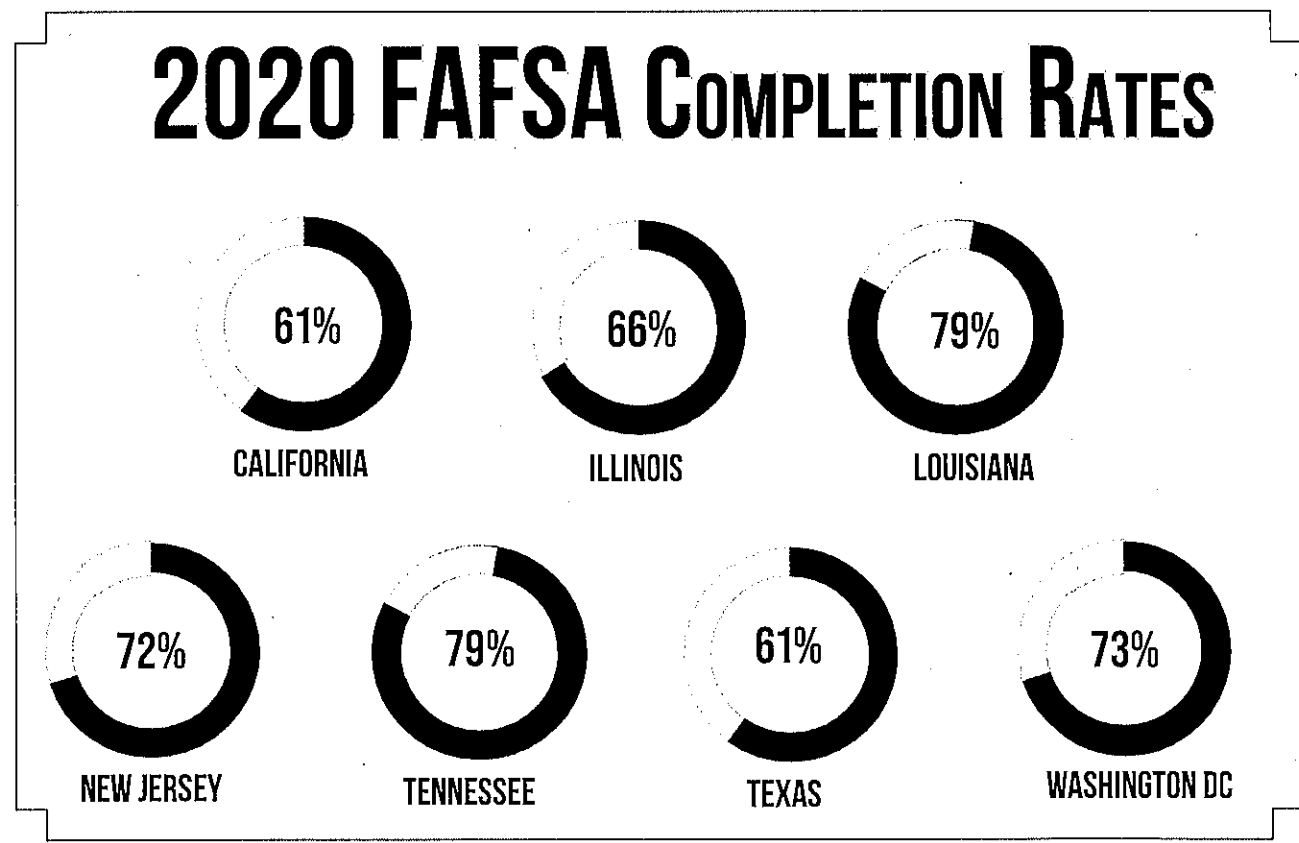
Financial Aid). This information is used by district counselors (or ISACorps, with permission from schools) to help reach students who might otherwise not complete an application.<sup>71</sup>

The school district must make a good-faith effort to assist the student and their family with the form before a student may be exempted for extenuating circumstances. The Illinois State Board of Education (ISBE) makes available through their website a FAFSA Nonparticipation Form for this purpose (in English and Spanish).<sup>72</sup> In addition, the policy states explicitly that a student with extenuating circumstances who meets all other requirements by graduation besides completing the FAFSA will not be denied their diploma.<sup>73</sup> Like Louisiana, this is an opt-in system, with an easy chance to opt-out.

## TEXAS

Texas will implement its FAFSA completion policy, which was passed with bipartisan consensus, in the 2021-2022 academic year. Texas' FAFSA completion rate was 61% in 2019 and 2020.<sup>74</sup>

Like Louisiana and Illinois, the Texas law stipulates that students can readily receive waivers to the requirement. Any parent or student aged 18 or older can opt out. A waiver may also be granted for "good cause as determined by the school counselor." This stipulation could be beneficial for undocumented students though there are concerns that it might allow counselors to waive large numbers of students at a time. However, the state has also passed a new performance-based funding policy that offers a financial incentive to schools to maximize FAFSA completion.<sup>75</sup> This new funding stream supplies districts with "outcomes bonus funding" when



college-ready graduates enroll in college, with higher bonus amounts when the student is eligible for free and reduced price lunch (FRPL) or is in special education.<sup>76</sup>

Students can also fulfill the obligation by completing the Texas Application for State Financial Aid (TASFA), which is used to collect information to help determine eligibility for state financial aid programs that are administered by institutions of higher education in Texas.<sup>77</sup> Students that are classified as Texas residents who cannot apply for federal financial aid using the FAFSA (such as DACA students) are encouraged to complete the TASFA.<sup>78</sup>

## CALIFORNIA

As of January 2021, Governor Gavin Newsom proposed a mandatory FAFSA completion policy for all high school seniors in California starting in the 2021-2022 school year. It is currently in the budget but has not yet been passed. In 2019, 62% of high school seniors in California completed the FAFSA.<sup>80</sup>

The Val Verde Unified School District in Riverside County was the first in the state to require FAFSA completion in 2017. Its policy is similar to that of Louisiana, in which submission satisfies a student's graduation requirement, and students may opt out. Students who are not U.S. citizens may satisfy the requirement by completing an application for state financial aid. Val Verde has 20,000 students and 73% are Latinx, 16% are Black, and 84% are low-income and participate in free and reduced price lunch (FRPL).<sup>81</sup> The number of state-funded Cal Grants and grants for undocumented students offered to Val Verde seniors rose from 397 in 2016 before the program started to 947 in 2019, or from about 28% to more than 60% of the senior classes.<sup>82</sup> Only 11 twelfth graders in the class of 2018 and 10 in the class of 2019 opted out of the requirement, or less than 1% of seniors. The district's rate of graduates immediately enrolling in college fell from 61% to 58% in the first year of the policy, but it rose to a high of 64% the following year.

It is important to mention that the district's mandatory FAFSA policy is only one component of a high-touch approach to FAFSA completion. For example, district administrators spend one night per year calling every senior who has not submitted a FAFSA. The district provides a rigorous counselor professional development program that has been recognized as a model for other districts in California. Val Verde has also used local partnerships to improve FAFSA completion. The district partners with a local legal center for undocumented families to assist with outreach on the importance of completing state financial aid forms. In addition, the local community college is an active partner in FAFSA completion efforts, and students are encouraged to apply for admission there while applying for aid.<sup>83</sup>

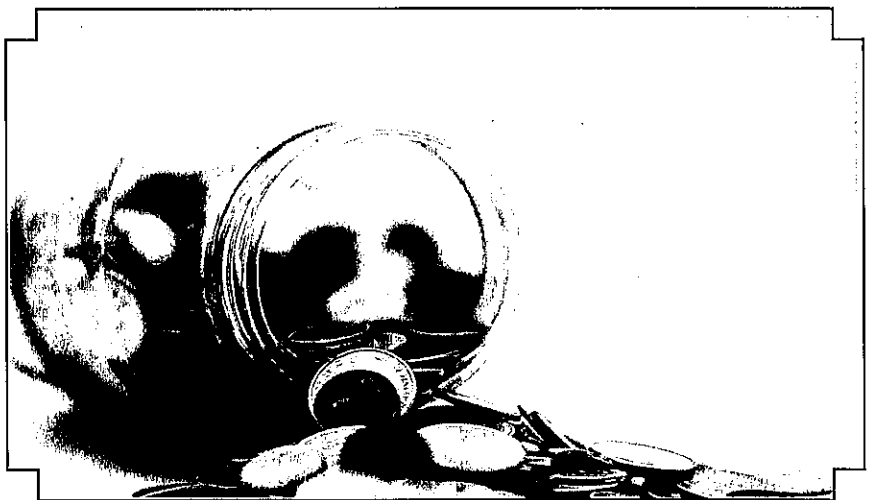


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## New Jersey FAFSA Initiatives

There are some notable FAFSA completion initiatives across New Jersey as well. A bill was introduced at the state level in August 2020 sponsored by Senator Robert W. Singer of District 30 (Monmouth and Ocean) and Senator M. Teresa Ruiz of District 29 (Essex). The bill would require students to complete the FAFSA as part of high school graduation requirements. If passed, this would begin in the 2022-2023 school year for students in eleventh grade. Exemptions would include: (1) “a form signed by the parent or guardian, or by the student if he is at least 18 years of age, requesting the exemption”; or (2) “a form signed by the school counselor authorizing the exemption for good cause as defined by the State board.”<sup>84</sup> The Commissioner of Education, in consultation with the Executive Director of the Higher Education Student Assistance Authority (HESAA), would provide a list of resources for school districts, parents, and students that include instructions on how to complete the FAFSA to school counselors or other school employees who assist students in completing the form. Each school district would then annually notify students and their parents or guardians of the requirement established by the bill. The Department of Education would verify which students have met the requirement and include that information in the student’s record and the school report card.

HESAA also plays a strong role in FAFSA programs with community partners like the United Way and Make the Road. Andre Maglione, the Acting Director of Client Services at HESAA, stated that they “provide materials, training, data and direct communication with school counselors” and organize financial aid nights across the state to help families with the FAFSA and provide resources to undocumented students.<sup>85</sup> To further boost completion rates in New Jersey, HESAA kicked off a concentrated outreach effort in the fall of 2019 in Newark, Camden, Elizabeth, and Paterson high schools, malls, and community organizations.<sup>86</sup>

### ELIZABETH

In September 2019, Elizabeth Public Schools (EPS) and Make the Road New Jersey (MRNJ)—an organization whose work centers on immigrant, working class, and Latinx communities—launched a Student Success Center (SSC), a peer-to-peer training and support network which aims to increase college applications in EPS’s seven highest-need high schools by 20% and financial aid applications district-wide by 15% in its first year. A survey by Make the Road youth found that more than 85% of EPS students wanted to go to college, but over 60% reported inadequate access to counseling and information about college. New Jersey’s first-ever SSC is located inside of Halsey Academy (one of the seven EPS high schools). The SSC is open to all Halsey Academy students during the school day and open to all EPS students after school. In its first four months, 100% of Halsey Academy seniors received college and financial aid access training through the SSC, 85% of Halsey Academy seniors applied to college, and more than 350 EPS high school students from throughout the district applied for financial aid with College Ambassadors’ support.<sup>87</sup> Contact info: <https://www.maketheroadnj.org/login>

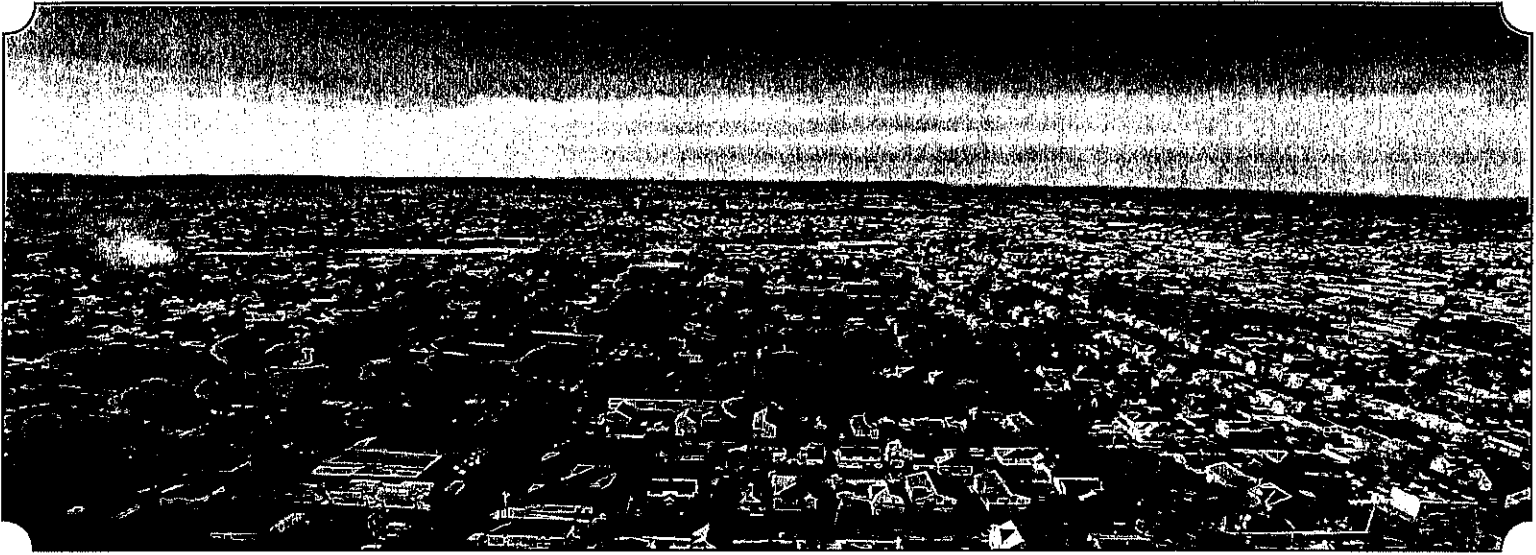


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## PATERSON

Paterson FAFSA Finish Line is a challenge for high school seniors to complete their FAFSA application by March 1 of their senior year. United Way, Paterson Public Schools, and community partners provide help for students and parents. The initiative maintains an active Facebook page where they post events, available scholarships, debunk myths about the FAFSA, and feature local high school seniors who have completed the form. In the 2019-2020 school year, Paterson FAFSA Finish Line held twice weekly FAFSA Assistance Days at a local mall in which they assisted low-income and first generation students in completing the FAFSA and provided financial aid resources. Make the Road New Jersey, a FAFSA Finish Line partner, offered financial aid workshops for Dreamers and immigrant students at local libraries, and United Way offered “Financial Aid U,” which aims to increase the number of low-income students who enroll in postsecondary education, develop recommendations to simplify the FAFSA, and align the FAFSA and tax preparation process so that families can complete both forms at the same time. They provide one-on-one service to parents and students, serving as a guide through the FAFSA process and helping families understand their financial options.<sup>88</sup> Contact info: <https://www.facebook.com/PatersonFAFSA/>; <https://www.unitedwaypassaic.org/college-access>

## NEWARK

The Newark FAFSA Challenge, an initiative of the Newark City of Learning Collaborative (NCLC) modeled on the Kresge Foundation FAFSA Challenges, was started in 2019.<sup>89</sup> The Challenge’s intent is to build this work into an “embedded on-going school system-community partnership” not just an occasional campaign. Despite the COVID-19 pandemic, the Challenge made progress in the 2019-2020 school year by building an infrastructure of community-based partnerships to support FAFSA work in neighborhoods where completion rates have been historically low. Partners of the Challenge include the NCLC, Newark Public Library, Newark Board of Education, United Way of Greater Newark (UWGN), and the Office of the Mayor. Contact info: <https://nclcnewark.org/newarkfafsachallenge/>; [nclc.info@newark.rutgers.edu](mailto:nclc.info@newark.rutgers.edu)

## SPECIAL CONSIDERATION IN NEW JERSEY: UNDOCUMENTED STUDENTS

According to the American Immigration Council, over a quarter-million U.S. citizens in New Jersey lived with at least one family member who was undocumented in 2016.<sup>90</sup> During the same period, about 1 in 11 children in the state was a U.S. citizen living with at least one undocumented family member (180,580 children in total). 475,000 undocumented immigrants comprised 22% of the immigrant population and 5% of the total state population in 2016. New Jersey is also home to over 16,000 DACA recipients. As a result, New Jersey adopted S.2479 legislation in 2013 which grants undocumented students in-state tuition.<sup>91</sup> New Jersey Governor Phillip D. Murphy signed a law in May 2018 to extend financial aid to immigrants without legal status; the state has since awarded more than \$7 million to over 1700 undocumented students. Undocumented students in New Jersey without a Social Security number are not eligible for federal aid through the FAFSA, but they can complete the New Jersey Alternative Financial Aid Application in order to receive state aid. Passed in 2018, it is a confidential application separate from FAFSA that is used solely by HESAA to qualify DACA students enrolled in eligible New Jersey colleges and universities for state aid. Information that is shared via this application is used only by HESAA and partner colleges, universities, and other state agencies in order to administer grants and scholarships.<sup>93</sup>



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## Conclusion

### FAFSA COMPLETION CONTRIBUTES TO GREATER COLLEGE ATTENDANCE AND PERSISTENCE TO GRADUATION PARTICULARLY FOR LOW-INCOME, PART-TIME, COMMUNITY COLLEGE, AND STUDENTS OF COLOR.

However, there are a number of challenges associated with FAFSA completion and submission. The form is complicated and requires a great deal of information that some families do not always have access to or feel comfortable sharing. The verification process can deter low-income families from completing the FAFSA as well. Even when the FAFSA is submitted, it still must be *completed* with parent signatures in order to receive aid. The timing of FAFSA submission is also critical. Schools need additional counselors, or other resources, to provide necessary supports in order to improve completion rates, but schools that serve low-income populations often have fewer counselors on staff. Undocumented students without DACA status are not eligible for federal aid but are often eligible for other forms of aid in many states, though a great deal of misinformation exists. The COVID-19 pandemic has created a number of barriers as well including the loss of institutional support for our most vulnerable students.

There are FAFSA campaigns in many parts of the country which are built around information drives, dedicated personnel, cross-sector partnerships, one-on-one supports (often from peers), and a variety of incentives for students and schools. Mandatory completion policies in California, Illinois, Louisiana, and Texas have also been effective. It is already very clear that the pandemic is disrupting pathways to college for many students, especially vulnerable students. Redoubling our efforts to ensure that low-income students have the widest access to financial resources for college or vocational training may help us put more students back on paths leading to a strong start in adult life.

## Glossary

**Deferred Action for Childhood Arrivals (DACA)** is a U.S. policy enacted June 15, 2012 in which certain people who came to the country as children and meet several guidelines may request consideration of deferred action for a period of two years, subject to renewal. They are also eligible for work authorization. Deferred action is a use of prosecutorial discretion to defer removal action against an individual for a certain period of time. Deferred action does not provide lawful status.

**Expected Family Contribution (EFC)** is a measure of a family's financial strength and is calculated according to a formula established by law. A family's taxed and untaxed income, assets, and benefits (such as unemployment or Social Security) are all considered in the formula. As of December 2020, the EFC is now known as the student aid index and the formula has been adjusted so that more students are eligible for the Pell grant.

**The Free Application for Federal Student Aid (FAFSA)** is a form used to apply for federal student aid, such as federal grants, work-study, and loans. In addition, many states and colleges use FAFSA information to determine eligibility for state and school aid, and some private financial aid providers may use FAFSA information to determine whether students qualify for their aid. FAFSA can also be used for vocational, career, and technical education or trade school.

**Pell grants** are federal awards to undergraduate students who display exceptional financial need and have not earned a bachelor's, graduate, or professional degree. The maximum Federal Pell grant award is \$6,345 for the 2020–2021 award year. The amount a student is awarded depends on their EFC (now known as the student aid index), the cost of attendance, their status as a full-time or part-time student, and their plans to attend school for a full academic year or less. Grants, unlike loans, do not have to be repaid.

**Student Aid Index** is the new term for the EFC in the Higher Education Act of December 2020. The formula used has been adjusted so that more students are eligible for the Pell grant.

**Verification** is the process a college or university uses to confirm that the data reported on a FAFSA form is accurate. If a family is selected for verification, the school will request additional documentation that supports the information reported. Please note that as of December 2020, fewer students will be subject to verification than in the past.

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## Resources

ASA Research. [Staking Their Claim: Promising Practices for Facilitating FAFSA Completion](#)

Brookings. [Many states require FAFSA filing before high school graduation, but timing can be everything](#)

The Century Foundation. [Should States Make the FAFSA Mandatory?](#)

Cowen Center. [FAFSA for Students with Non-Traditional Needs](#)

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Kresge Foundation. [FAFSA Stories](#)

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- <sup>86</sup> HESAA. Strengthening NJ one student at a time: HESAA's 2019 annual report expanding access to opportunity through higher education. <https://www.hesaa.org/Documents/Financial/AnnualReports/annualreport2019.pdf>
- <sup>87</sup> Make the Road. Building student success: Make the Road New Jersey launches first youth led student success center with EPS! <https://www.maketheroadnj.org/ssc>
- <sup>88</sup> Paterson FAFSA Finish Line. <https://www.facebook.com/PatersonFAFSA/>; United Way. Financial Aid U. <https://www.unitedwaypassaic.org/college-access>
- <sup>89</sup> To learn more about NCLC, see <https://nclcnewark.org/>; Kresge Foundation (May 24, 2016). 22 cities announced as FAFSA Completion Challenge Grant winners. <https://kresge.org/news/22-cities-announced-fafsa-completion-challenge-grant-winners>
- <sup>90</sup> American Immigration Council. Immigrants in New Jersey. <https://www.americanimmigrationcouncil.org/research/immigrants-in-new-jersey>
- <sup>91</sup> Serna, G. R., Cohen, J. M., & Nguyen, D. H. K. (2017). State and institutional policies on in-state resident tuition and financial aid for undocumented students: Examining constraints and

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<sup>92</sup> Alvarado, M. (Mar. 7, 2020). NJ to give financial aid to record 85,000 students, including more undocumented immigrants. North Jersey. <https://www.northjersey.com/story/news/new-jersey/2020/03/07/nj-hand-out-record-amount-financial-aid-college-students/4976446002/>

<sup>93</sup> Higher Education Student Assistance Authority (HESAA). Financial aid resources for New Jersey Dreamers. <https://www.hesaa.org/Pages/NJAlternativeApplication.aspx>; Babineau, K. (Nov. 2017). FAFSA for students with non-traditional needs. Cowen Center, Tulane University. <https://files.eric.ed.gov/fulltext/ED586837.pdf>

<sup>94</sup> DACA. <https://www.uscis.gov/archive/consideration-of-deferred-action-for-childhood-arrivals-daca>

<sup>95</sup> Expected Family Contribution. <https://studentaid.gov/help-center/answers/article/what-is-expected-family-contribution>

<sup>96</sup> FAFSA. <https://studentaid.gov/h/apply-for-aid/fafsa>

<sup>97</sup> Federal Pell Grants. <https://studentaid.gov/understand-aid/types/grants/pell>

<sup>98</sup> Verification. [studentaid.gov](https://studentaid.gov)



# Improving Access to Post-Secondary Education Through FAFSA Completion

Rutgers University-Newark

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Testimony for Joint Committee on the Public Schools

June 9, 2023

Good morning, Co-Chair Reynolds-Jackson, Co-Chair Cryan, and Joint Committee members. Thank you for the opportunity to present my testimony. My name is Peter Granville. I am a Fellow at The Century Foundation, an independent non-partisan think tank based in New York and Washington, D.C. focused on reducing inequality in the United States.

I was born and raised in Sussex County, and I am a proud graduate of New Jersey public schools. When I was a senior at High Point Regional High School, I was able to attend a high-quality college thanks to the financial aid I qualified for. However, I know that many of my peers did not view college as a viable pathway, in part due to perceived costs. Every student in New Jersey should have the chance to make their college enrollment decisions with full knowledge of the financial aid they are entitled to and eligible for. That is why I am pleased to share my perspective on the FAFSA graduation requirement being considered in A1181/S2054.

My testimony is informed by my research into the FAFSA graduation requirement's outcomes in Louisiana, the first state to enact this policy.<sup>1</sup> You can find this full analysis in my report, *Should States Make the FAFSA Mandatory?*, published July 2020.

FAFSA graduation requirements are a recent policy innovation to help students understand their financial aid eligibility in a higher education system where maximizing financial aid is paramount for low- and middle-income families seeking a college education. Over the past forty years, the average price of tuition and required fees, after accounting for inflation, has more than tripled.<sup>2</sup> In the 2020-21 award year, more than \$124 billion in federal, state, and institutional grants was awarded to students, helping to offset the tuition that students and their families pay every year.<sup>3</sup> Many sectors of higher education in the United States charge high costs with the expectation that low- and middle-income families will take advantage of Pell Grants and other need-based grants, a financing model known as “high tuition, high aid.” Many of New Jersey’s colleges and universities are examples of this model.<sup>4</sup>

However, if a student and their family never complete an application for financial aid, they may only see the “high tuition” side of the “high tuition, high aid” coin, and they may incorrectly assume that a college education is out of their financial reach. The National College Attainment Network estimates that, in 2021, \$3.75 billion in Pell Grants was left unclaimed by high school students who qualify but did not submit applications.<sup>5</sup> Research has shown that an increase of just \$1,000 in grant aid raises the likelihood

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<sup>1</sup> “FAFSA” refers to the Free Application for Federal Student Aid. While A1181/S2054 does not name the FAFSA specifically, I assume in this testimony that the “financial aid application in a form prescribed by the Higher Education Student Assistance Authority” as listed in section (1)(a) will include the FAFSA.

<sup>2</sup> In the 1981-82 academic year, the average undergraduate tuition and required fees was \$4,365, in constant 2022 dollars. In 2021-22, this average had risen to \$14,307. See Table 330.10, “Digest of Education Statistics,” National Center on Education Statistics, accessed June 2023.

<sup>3</sup> In the 2020-21 award year, students received \$36.5 billion in federal grants, \$13.5 billion in state grants, and \$74.4 billion in institutional grants. Source: Jennifer Ma and Matea Pender, “Trends in College Pricing and Student Aid,” The College Board, 2022.

<sup>4</sup> Katie Kausch and Brianna Kudisch, “College costs in N.J. are high but also deceiving. Here’s what you might actually pay.” *NJ.com*, March 2022.

<sup>5</sup> “NCAN Report: \$3.75 Billion in Pell Grants Goes Unclaimed for High School Class of 2021,” National College Attainment Network, 2022.

of a student enrolling in college by several percentage points; for context, the maximum Pell Grant for the 2023-24 award year is \$7,395.<sup>6</sup>

Under A1181/S2054, students could still choose not to complete FAFSA, but the graduation requirement would require high school students to make a conscious decision about whether to apply.<sup>7</sup> In my opinion, the major upside of the requirement is that it starts conversations about financial aid eligibility that may not happen otherwise, and it starts them sooner instead of later.

Louisiana was the first state to enact a statewide FAFSA graduation requirement, a change that took effect starting with its high school graduating class of 2018. Annual FAFSAs completed by high school students in Louisiana increased by 25 percent, motivating other states to adopt the policy in the years to come. Building on this topline finding, [my research](#) found the following:

- Before the policy took effect, 1 in 3 Louisiana public high schools had a FAFSA completion rate of at least 65 percent before the policy. Afterwards, 4 in 5 did.<sup>8</sup> Overall, the state's FAFSA completion rate increased by 10 percentage points. (See Figure 1 in "Additional Materials.")
- The FAFSA completion gap separating Louisiana's high-income districts from low-income districts closed from 8.5 percentage points to 1.1 percentage points in just one year.<sup>9</sup> (See Figure 2 in "Additional Materials.") Across many states, including New Jersey, high-income districts show greater FAFSA completion rates than low-income districts, despite the fact that low-income districts' students are more likely to qualify for need-based grant aid.<sup>10</sup> Louisiana has bucked this trend under its graduation requirement.
- 12th graders in Louisiana submitted a greater share of FAFSAs in months close to graduation than 12th graders in the U.S. overall. (See Figure 3 in "Additional Materials.") While high school graduation often falls after state financial aid deadlines, it is not too late to qualify for the federal Pell Grant for the coming fall semester.
- Between 2015 and 2019, Louisiana saw the largest increase out of any state in the share of college students who receive Pell Grants.<sup>11</sup>

I interpret these findings to mean that the graduation requirement can raise the floor for the share of high school seniors in public schools who complete the FAFSA, with the greatest gains occurring in low-income school districts, and that it can lead to greater financial aid uptake among eligible students.

There are two major factors I urge you to consider when discussing A1181/S2054 and planning its implementation if enacted.

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<sup>6</sup> For a review of this research literature, see Susan M. Dynarski and Judith Scott-Clayton, "Financial Aid Policy: Lessons from Research," The Gerald R. Ford School of Public Policy at the University of Michigan, January 2013.

<sup>7</sup> If a student or their family prefers not to apply, they can easily opt out. In other states where this requirement has been enacted, the opt-out waiver is no lengthier than a field trip permission slip. High school counselors can also waive a student from the requirement.

<sup>8</sup> Peter Granville, "Should States Make the FAFSA Mandatory?," The Century Foundation, 2020.

<sup>9</sup> Ibid.

<sup>10</sup> See Figure 9 in Danielle Lowry, "An Analysis of the Relationship Between School District Poverty and FAFSA Completion in June 2016-2018," National College Attainment Network, October 2018.

<sup>11</sup> Source: author's analysis of data from the U.S. Department of Education Office of Federal Student Aid.

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### *State support for FAFSA completion*

The FAFSA is a notoriously complex form, and hands-on support with FAFSA completion is considered the gold standard for increasing completion rates. In an experimental study, researchers found that offering families both information *and* direct assistance with the FAFSA raises financial aid receipt, college attendance, and persistence by eight percentage points, whereas offering families information alone does not lead to significant improvements along these measures.<sup>12</sup>

A1181/S2054 as currently written would not require school employees to assist students with the FAFSA.<sup>13</sup> It would require HESAA to provide a list of resources for school districts, families, and students. Depending on a school's capacity to assist families with the FAFSA, this approach may leave families without the hands-on assistance that they need to troubleshoot the specific questions that their finances pose when completing the form.<sup>14</sup>

I recommend the legislature provide new resources to HESAA to offer hands-on workshops in New Jersey high schools. The Louisiana Office of Student Financial Assistance hosts FAFSA completion workshops at high schools, and it increased its number of workshops from 85 in 2016-17, the year before its graduation requirement was enacted, to 151 in 2017-18 and 218 in 2018-19. The increase in these workshops, in combination with the graduation requirement, may have contributed to the state's strong improvement in FAFSA completion.

### *Assisting undocumented students*

School administrators overseeing implementation of A1181/S2054 must be sensitive to how undocumented students will experience the policy. Non-citizen students are ineligible for federal financial aid, and a Social Security number is required for a student to complete a FAFSA.<sup>15</sup> If proper precautions are not taken, there is an inherent risk of an undocumented student unintentionally disclosing their status to their counselor or even in front of their peers.

New Jersey already allows undocumented students to access state financial aid and in-state tuition. Through the New Jersey Alternative Financial Aid Application, Dreamer students can apply for state financial aid. Counselors and school administrators can direct students to the alternative application if they do not have a Social Security number, and if A1181/S2054 passes, HESAA can count the completion of the alternative application as sufficient for the graduation requirement.

However, this will be for naught if families and schools incorrectly assume that undocumented students are ineligible for any financial assistance in college. HESAA should ensure through professional development that counselors and administrators understand these opportunities for undocumented students and can appropriately direct students through the alternative form. The legislature should provide

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<sup>12</sup> Eric Bettinger, Bridget Terry Long, Philip Oreopoulos, and Lisa Sanbonmatsu, "The Role of Application Assistance and Information in College Decisions: Results from the H&R Block Fafsa Experiment," *Quarterly Journal of Economics*, 127(3), 2012.

<sup>13</sup> By contrast, under Illinois' FAFSA graduation requirement, schools must make a "good faith effort" to assist a student and their family with the financial aid application before a student can be exempted for extenuating circumstances.

<sup>14</sup> For context, New Jersey had a student-to-counselor ratio of 337:1 in 2020-21, which is lower than most states but is still above the American School Counselor Association's recommended maximum ratio of 250:1.

<sup>15</sup> If a student has a Social Security number but their parents do not, the student can still complete the form and is eligible for federal financial aid.

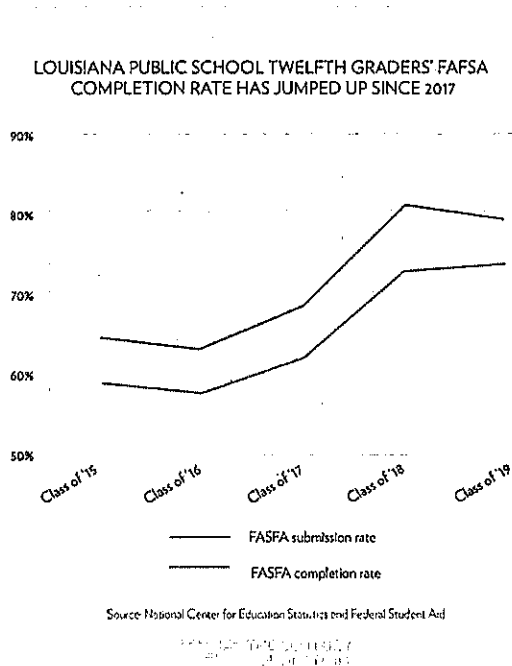
sufficient funding to HESAA so that it can carry out this professional development, which would only grow in importance with the enactment of A1181/S2054.

A1181/S2054 would make FAFSA completion a graduation requirement for the first time in New Jersey. However, for any low- or middle-income family that wants to afford college, the FAFSA has always been a necessity. In my opinion, this bill is an example of policy shifting to reflect reality. I recommend that the legislature pass A1181/S2054, and I also urge the legislature to allocate new funding to ensure that students and their families can access hands-on support with the FAFSA beyond informational resources alone.

Thank you. I look forward to your questions.

### Additional Materials

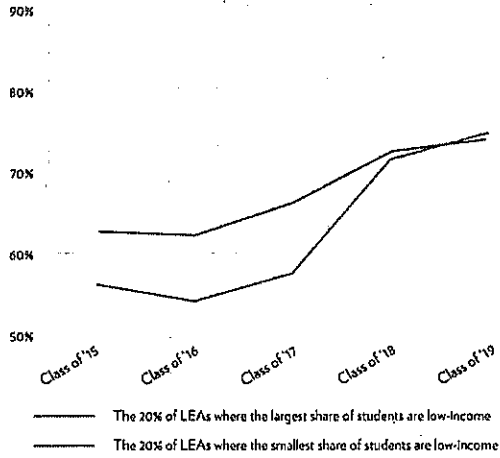
Figure 1



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Figure 2

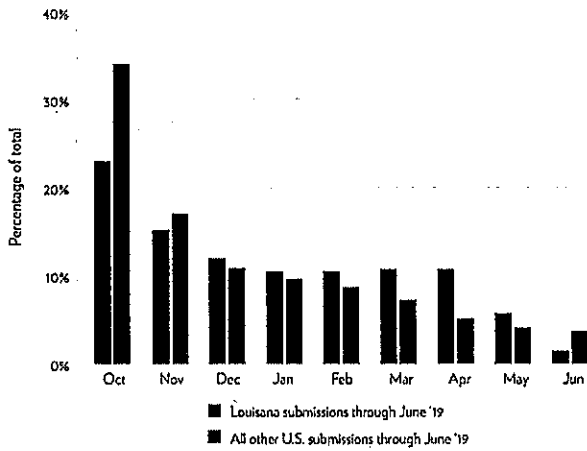
LEAS WITH MANY LOW-INCOME STUDENTS SEE THE STRONGEST GAINS IN FAFSA COMPLETION



Source: National Center for Education Statistics and Federal Student Aid

Figure 3

LOUISIANA SEES MORE FAFSA SUBMISSIONS CLOSE TO HIGH SCHOOL GRADUATION, RELATIVE TO THE NATION



Data source: Federal Student Aid, U.S. Department of Education. This data represents the 2019-20 cycle, which runs from October 2018 to December 2019.

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# Newark Board of Education

Roger León, Superintendent

Where Passion Meets Progress

VIA EMAIL ONLY

June 9, 2023

Senator Joseph P. Cryan  
Assemblywoman Verlina Reynolds-Jackson  
Co-Chairs, Joint Committee on the Public Schools  
New Jersey State Legislature

**RE: Proposed Legislation Establishing Completion of the Free Application  
for Federal Student Aid as a High School Graduation Requirement**

Dear Co-Chairs Cryan and Reynolds-Jackson:

In connection with the Joint Committee on the Public Schools' discussion of high school students completing the financial aid application, we write to communicate the support of the Newark Board of Education for legislation establishing completion of a financial aid application as a requirement for a state-endorsed high school diploma.

At its meeting on June 22, 2021, the Newark Board of Education voted unanimously to amend its graduation requirements to add the requirement of completion of the Free Application for Federal Student Aid (FAFSA) or the New Jersey Alternate Financial Aid Application (NJAAFA). The Board's action was taken by resolution acknowledging, among other things, research indicating that two-thirds of almost all living wage jobs will require a postsecondary credential, and that FAFSA gives students access to the largest source of financial aid to pay for college or vocational school. The resolution provides for exemption from the requirement for students who do not qualify for the FAFSA or NJAAFA.

I know firsthand how difficult it is to consider changes to graduation requirements and applaud you for your leadership on this issue. Completion of the FAFSA opens doors to students, provides them with opportunities to realize their true potential, and enables the rest of the world to benefit from their genius. In just two years of implementation, we in Newark have hundreds more students enrolling in institutions of higher education, leading to significant improvements in post-secondary outcomes for them and their families.

For the Joint Committee's information, copies of the resolution, amended Newark Board of Education Policy 6146, Graduation Requirements are attached. Also attached are copies of our FAFSA/NJAAFA Exemption Form (in five languages, also available on the Board's website, <https://www.nps.k12.nj.us/departments/studentlife/fafsa-njafaa/>).

Thank you for your consideration of this important issue.

Respectfully,

Roger León  
Superintendent

cc: Senator Teresa Ruiz  
Rebecca DiBenedetti, Executive Director

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# Newark

## Board of Education

### AGENDA ITEM

**Meeting Date:** 6/22/2021 - 6:00 PM

**Category:** Board Resolutions



**Type:** Action

**Subject:** 11.1 Resolution to amend Board Policy 6146 (Graduation Requirements) to include FAFSA or NJFAAA

**Strategic Plans:**

**Enclosure:** Policy 6146 Graduation Requirements

**File Attachment:**

-  Policy File  
Code\_6146\_Graduation\_Requirements.pdf
-  Resolution\_Amend Policy 6146 FAFSA\_NJFAAA Requirement.pdf

**Summary:**

Resolution of the Board of Education of the City of Newark, County of Essex, Providing That the FAFSA or the NJFAAA Is To Be Completed by All Students as a Graduation Requirement and Amending Board Policy 6146 (Graduation Requirements) to So Provide

WHEREAS the Board of Education is committed to preparing all students for the transition from high school to multiple pathways after graduation – both college and career;

WHEREAS research indicates two-thirds of almost all living wage jobs will require a postsecondary credential; and training for credentials can be expensive and entrance applications can sometimes be challenging;

WHEREAS the Free Application for Federal Student Aid (FAFSA) gives students access to the largest source of financial aid to pay for college or vocational school; as by completing the FAFSA, students can be considered for federal financial aid, including Pell grants, work-study programs, and loans, and many states and colleges, as well as some private financial aid providers, use FAFSA information to determine students' eligibility for aid;

WHEREAS, additionally, FAFSA is a prerequisite for Direct Unsubsidized Loans, Grad PLUS Loans, and Parent PLUS loans, which are available without regard to demonstrated financial need and have lower interest rates than private loans; and

WHEREAS the New Jersey Alternate Financial Aid Application (NJFAAA) is an option for some students who are not United States citizens, and its completion will afford students financial benefits similar to those obtained from the FAFSA, and will be considered an acceptable option;

WHEREAS training of staff, parents, and students will be a critical component of implementation of this policy; and

WHEREAS students and parents will be permitted to request an exemption from the requirement to complete the FAFSA or NJFAAA;

WHEREAS this new language that describes FAFSA/NJFAAA graduation requirement has been inserted into File Code: 6146:

F. Complete FAFSA/NJFAAA

**FAFSA/NJFAAA**

"For students who do not qualify for the Free Application for Federal Student Aid (FAFSA) or the New Jersey Alternative Financial Aid Application (NJFAAA), parents/guardians should complete the FAFSA/NJFAAA Exemption Form and submit it to their child's school counselor by June 1st of the student's senior year."

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**Funding :** None

**Recommendation to the Board** NOW, THEREFORE, BE IT RESOLVED that beginning in the 2021-2022 school year, either the FAFSA or the NJAFSA is to be completed by all students as a graduation requirement; and

BE IT FURTHER RESOLVED that Board Policy 6146 shall be and hereby is amended to provide that the FAFSA or the NJAFSA is to be completed by all students as a graduation requirement

**Approvals:**

**Recommended By:**

- Signed By: *Signature*  
Mary Harvey - Director
- Signed By: *Signature*  
Carolyn Granato - Assistant Superintendent
- Signed By: *Signature*  
Dr. Mary Ann Reilly - Assistant Superintendent
- Signed By: *Signature*  
Brenda Liss - General Counsel
- Signed By: *Signature*  
Nicole T. Johnson - Deputy Superintendent
- Signed By: *Signature*  
Roger León - Superintendent

**Vote Results:**

**Original Motion**

Member **Josephine Garcia** Moved, Member **Dawn Haynes** seconded to approve the **Original** motion 'NOW, THEREFORE, BE IT RESOLVED that beginning in the 2021-2022 school year, either the FAFSA or the NJAFSA is to be completed by all students as a graduation requirement; and

BE IT FURTHER RESOLVED that Board Policy 6146 shall be and hereby is amended to provide that the FAFSA or the NJAFSA is to be completed by all students as a graduation requirement'. Upon a Roll-Call Vote being taken, the vote was: Aye: **9** Nay: **0**.  
The motion **Carried 9 - 0**

- Josephine Garcia Yes
- Flohissha Johnson Yes
- Dawn Haynes Yes
- Asla J. Norton Yes
- Shayvonne Anderson Yes
- A'Dorlan Murray-Thomas Yes
- Hasani Council Yes
- Vereliz Santana Yes
- Daniel Gonzalez Yes



## NEWARK BOARD OF EDUCATION Newark, New Jersey POLICY



FILE CODE: 6146

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### GRADUATION REQUIREMENTS

In order to graduate from a high school of the Newark Board of Education, and receive a State-endorsed diploma, a student must:

- A. Meet both state and district proficiency standards in the core curriculum content areas; achieve or exceed passing grade on New Jersey Department of Education approved state-wide high school proficiency assessment;
- B. Successfully complete the course requirements stated in the Administrative Code, unless those of the district are greater, in which case the district's standard must be met. The proficiencies required must include the New Jersey Student Learning Standards as approved by the State Board of Education, Board of Education;
- C. Successfully complete coursework at the high school level or above, representing a minimum of 130 credits, including, but not limited to, 20 credits of Language Arts, 20 credits of Mathematics, 20 credits of Science, 20 credits of Social Studies, and 10 credits of World Language;
- D. Complete 80 hours of Community Service;
- E. Complete a senior thesis, as prescribed by the Board of Education; and
- F. Complete FAFSA/NJFAAA.

Successful completion means that the pupil has demonstrated the degree of proficiency required by the district to indicate achievement of the district goals for the particular course, and has attended the required number of course sessions.

Transfer pupils must meet all state and local requirements in order to receive a diploma. The Superintendent shall put into effect the procedures necessary to assess each pupil upon entry into the system, and, annually thereafter, to identify those pupils not meeting the state or district proficiency requirements. The Superintendent shall develop the programs necessary to remedy these deficiencies at the lowest possible grade level.

#### Remediation and Basic Skills

Pupils who do not pass the New Jersey Department of Education approved statewide proficiency assessment, the elementary assessment component for grades three through five and the middle school components for grades six through eight shall be provided appropriate remediation.

Twelfth-grade pupils who have satisfied all other graduation requirements but have repeatedly failed the statewide examination shall receive a special review assessment as provided by law.

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GRADUATION REQUIREMENTS (continued)

Pupils with Limited English Proficiency

Pupils with limited English proficiency must be provided with the program opportunities required by law, and must fulfill the regular state and district requirements for graduation.

Special Education Pupils

A disabled pupil must meet all state and local high school graduation requirements in order to receive a state-endorsed high school diploma unless exempted in his/her IEP. A pupil who qualifies may take an alternate proficiency assessment approved by the New Jersey Department of Education, if alternate requirements for graduation have been specified in his/her IEP.

By June 30 of a disabled pupil's last year in the elementary program, the pupil's case manager, parent/guardian and teacher(s) shall meet to review the instructional guide and basic plan of the pupil's IEP in view of the transition to the secondary program. Input from appropriate staff from the secondary school shall be part of the review.

The basic plan of the IEP for the pupil exiting the elementary program will address all the elements required in the administrative code. The description of the educational program will include exemptions, if any, from regular education program options or state and local graduation requirements including the Department of Education approved statewide high school proficiency assessment, along with the rationale for the exemptions. The exemptions must be approved in writing by the Superintendent or designee.

Required reviews of the IEP shall continue to address graduation requirements and shall explain why the proficiencies required for graduation are not part of the IEP.

Because graduation with a state-endorsed diploma is a change of placement that requires written notice, all procedures described in the administrative code shall be followed scrupulously. Procedures shall include written notice to parents/guardians that includes a copy of procedural safeguards published by the State Department of Education and opportunity for mediation or a due process hearing.

Proficiency

In consultation with appropriate professional staff, the Superintendent shall develop and present to the board for adoption indicators of achievement and standards of proficiency and attendance demonstrating successful completion of each course offered at every level of the high school. The subject matter and standards of proficiency shall be articulated with the district's elementary schools and with sending elementary districts.

In accordance with law, the district shall have copies of this policy distributed to all ninth-grade (or otherwise entering) pupils and their parents/guardians. They shall also be informed as to the examinations, demonstrated proficiencies, course and credit hour requirements, attendance policies, and any other state and local requirements.

Proficiency requirements for each individual course shall be given to pupils on registering for the course.

The yearly program of studies for each pupil in the high school must be approved and signed by the parent/guardian, except in the case of 18-year-old pupils.

FAFSA/NJAFSA

For students who do not qualify for the Free Application for Federal Student Aid (FAFSA) or the New Jersey Alternative Financial Aid Application (NJAFSA), parents/guardians should complete the FAFSA/NJAFSA Exemption Form and submit it to their child's school counselor by June 1<sup>st</sup> of the student's senior year.

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GRADUATION REQUIREMENTS (continued)

Early Graduation

Pupils who have clearly demonstrated a scholastic aptitude, an unusual readiness for the world of work, a financial need, or a serious health or family concern may be considered for early graduation. Minimal graduation requirements must be completed early. Approval must be obtained from the parents/guardians and the administration.

Pupil Enrollment in College Courses

The district shall make reasonable efforts to develop articulation agreements with New Jersey colleges and universities to facilitate the delivery of college credit courses to qualified pupils. The district shall determine eligibility requirements for these pupils and monitor the quality of the courses offered and college faculty who teach the courses.

Reporting and Monitoring

The Board shall include in the annual report to the commissioner:

- A. The total number of pupils graduated in the aggregate and disaggregated according to subgroups (economically disadvantaged, racial/ethnic sub-groups, students with disabilities, and students with limited English proficiencies) described in federal law;
- B. The number of pupils graduated under the who took a New Jersey Department of Education approved alternate high school proficiency assessment;
- C. The number of pupils receiving state-endorsed high school diplomas as a result of meeting any alternate requirements for graduation as specified in their IEP's;
- D. The total number of pupils denied graduation from the 12<sup>th</sup> grade class;
- E. The number of pupils denied graduation from the 12<sup>th</sup> grade class solely because of failure to pass the New Jersey Department of Education approved statewide high school proficiency assessment or alternative high school assessment, based on the provisions of administrative code.

This information shall be reported to the board at a public meeting prior to the date prescribed by law.

Adopted by State District Superintendent:	February 23, 2010
NJSBA Review/Update:	November 2010
Readopted by State District Superintendent:	December 21, 2010
Adopted by the Board of Education:	May 28, 2019
Adopted by the Board of Education:	June 21, 2021

Key Words

High School Graduation, Early Warning Test, HSPT, Graduation, Graduation Requirements

<u>Legal References:</u> N.J.S.A. 18A:4-25	Prescribing minimum courses of study for public schools; approval of courses of study
N.J.S.A. 18A:7C-1	Commissioner of education to develop a program of standards and guidelines

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GRADUATION REQUIREMENTS (continued)

<u>N.J.S.A.</u> 18A:7C-2	Boards of education; establishment of standards
<u>N.J.S.A.</u> 18A:7C-4.1	Operation Recognition; purpose; eligibility; application procedure
<u>N.J.S.A.</u> 18A:7C-5.1	Boards of education prohibited from excluding pupils from graduation ceremony or from obtaining yearbook for inability to pay fees
<u>N.J.S.A.</u> 18A:7F-4	Periodic review of curriculum content standard by state board; establishment of thoroughness and efficiency standards and cost per pupil
<u>N.J.S.A.</u> 18A:7F-29	Academic achievement reward program
<u>N.J.S.A.</u> 18A:33-1	District to furnish suitable facilities; adoption of courses of study
<u>N.J.S.A.</u> 18A:35-1 <u>et seq.</u>	Curriculum and courses
<u>N.J.S.A.</u> 18A:35-14.9	Pupil promotion and remediation; policies and procedures
<u>N.J.S.A.</u> 18A:36-17	Credit of seniors in active military and naval service, etc.
<u>N.J.A.C.</u> 6A:8-1.1 <u>et seq.</u>	Standards and Assessment
<u>See particularly:</u>	
<u>N.J.A.C.</u> 6A:8-1.2, -2.1, -3.1, -3.3, -4.1, -4.2, -4.3, -5.1, -5.2	
<u>N.J.A.C.</u> 6A:14-3.7	Individualized education program
<u>N.J.A.C.</u> 6A:14-4.12	Graduation
<u>N.J.A.C.</u> 6A:15-1.11	Graduation requirements for limited English Language Learners
<u>N.J.A.C.</u> 6A:23A-9.5	Commissioner to ensure achievement of the New Jersey Student Learning Standards
<u>N.J.A.C.</u> 6A:30-1.1 <u>et seq.</u>	Evaluation of the Performance of School Districts
<u>N.J.A.C.</u> 6A:33-1.1 <u>et seq.</u>	School turnaround and improvement

The Department of Education Website, <http://www.nj.gov/njded/assessment/>  
(Lists the state assessment components)

Every Student Succeeds Act of 2015, Pub.L.114-95, 20 U.S.C.A. 6301 et seq.

Possible

<u>Cross References:</u>	*1120	Board meetings
	*5113	Absences and excuses
	*5120	Assessment of individual needs
	*5127	Commencement activities
	6000	Concepts and roles in instruction
	*6010	Goals and objectives
	*6122	Articulation
	*6140	Curriculum adoption
	6141.4	Independent study
	*6142	Subject fields
	*6142.2	English as a second language; bilingual/bicultural
	*6142.6	Basic skills
	*6145	Extracurricular activities
	*6147	Standards of proficiency
	*6154	Homework/makeup work
	*6171.4	Special education
	*6200	Adult/community education

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GRADUATION REQUIREMENTS (continued)

\*Indicates policy is included in the Critical Policy Reference Manual

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Superintendent

# Newark Board of Education

Where Passion Meets Progress

## FAFSA/NJAFSA Exemption Form

Directions: This form must be completed and submitted to your child's school counselor of their senior year to be exempt from the FAFSA/NJAFSA.

**Student Information:**

High School: \_\_\_\_\_

Student Name: \_\_\_\_\_ Student ID: \_\_\_\_\_

Student Date of Birth: \_\_\_\_\_

As the parent or legal guardian, I have read the information provided about FAFSA/NJAFSA and understand the benefits to my child of completing FAFSA/NJAFSA. I am electing to not have my child complete either application as part of the graduation requirement.

I understand that completion of these applications increases my child's opportunity to attend and complete a two-year, four year college or university or technical school and I am opting my child out of the FAFSA/NJAFSA at this time.

Parent/Guardian Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Student Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Office Use Only:**

Counselor Name: \_\_\_\_\_

Counselor Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Principal Name: \_\_\_\_\_

Principal Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Conference Date: \_\_\_\_\_

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Where Passion Meets Progress

## Formulario de exención FAFSA/NJAFSA

Instrucciones: Este formulario debe completarse y enviarse al consejero escolar de su hijo en su último año para estar exento de la FAFSA/NJAFSA.

**Información del estudiante:**

Secundaria: \_\_\_\_\_

Nombre del estudiante: \_\_\_\_\_ Identificación del estudiante: \_\_\_\_\_

Fecha de nacimiento del estudiante: \_\_\_\_\_

Como padre, madre o tutor legal, he leído la información proporcionada sobre FAFSA/NJAFSA y entiendo los beneficios para mi hijo de completar FAFSA/NJAFSA. Elijo que mi hijo no complete ninguna de las solicitudes como parte del requisito de graduación.

Entiendo que completar estas solicitudes aumenta la oportunidad de mi hijo de asistir y completar una universidad o escuela técnica de dos o cuatro años y estoy optando por que mi hijo no participe en la FAFSA/NJAFSA en este momento.

Firma del padre-madre / Tutor: \_\_\_\_\_ Fecha: \_\_\_\_\_

Firma del estudiante: \_\_\_\_\_ Fecha: \_\_\_\_\_

**Solo para uso oficial:**

Nombre del consejero: \_\_\_\_\_

Firma del consejero: \_\_\_\_\_ Fecha: \_\_\_\_\_

Nombre del director: \_\_\_\_\_

Firma del director: \_\_\_\_\_ Fecha: \_\_\_\_\_

Fecha de la conferencia: \_\_\_\_\_

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Where Passion Meets Progress

## Formulário de isenção do FAFSA/NJAFSA

Instruções: Este formulário deve ser preenchido e enviado para o orientador escolar de seu filho/sua filha do último ano para isentar-se do FAFSA/NJAFSA.

### Informações do aluno:

Escola secundária: \_\_\_\_\_

Nome: \_\_\_\_\_ Identificação: \_\_\_\_\_

Data de nascimento: \_\_\_\_\_

Como pai/mãe ou tutor legal, eu confirmo que li as informações fornecidas sobre o FAFSA/NJAFSA e compreendo os benefícios para meu filho/minha filha de completar o FAFSA/NJAFSA. Estou a optar para que ele(a) não preencha nenhuma das inscrições como parte dos requisitos de graduação.

Compreendo que o preenchimento dessas inscrições aumenta a oportunidade de meu filho/minha filha frequentar e concluir uma faculdade, universidade ou escola técnica de dois ou quatro anos e estou a optar por excluí-lo(a) do FAFSA/NJAFSA neste momento.

Assinatura do pai/mãe/tutor: \_\_\_\_\_ Data: \_\_\_\_\_

Assinatura do aluno: \_\_\_\_\_ Data: \_\_\_\_\_

### Uso exclusivo da administração:

Nome do orientador: \_\_\_\_\_

Assinatura do orientador: \_\_\_\_\_ Data: \_\_\_\_\_

Nome do diretor: \_\_\_\_\_

Assinatura do diretor: \_\_\_\_\_ Data: \_\_\_\_\_

Data da conferência: \_\_\_\_\_

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# Newark Board of Education

Where Passion Meets Progress

## Formulaire d'exemption FAFSA/NJAFSA

Directions : Ce formulaire doit être rempli et soumis au conseiller scolaire de votre enfant au cours de sa dernière année pour être exempté de la FAFSA/NJAFSA.

**Informations sur l'élève :**

Lycée : \_\_\_\_\_

Nom et prénom de l'élève : \_\_\_\_\_ ID. de l'élève : \_\_\_\_\_

Date de naissance de l'élève : \_\_\_\_\_

En tant que parent ou tuteur légal, j'ai lu les informations fournies sur FAFSA/NJAFSA et je comprends les avantages que mon enfant peut retirer en terminant FAFSA/NJAFSA. Je choisis de ne pas demander à mon enfant de remplir l'une ou l'autre des demandes dans le cadre de l'exigence d'obtention du diplôme.

Je comprends que l'achèvement de ces demandes augmente les chances de mon enfant de fréquenter et de terminer une faculté, une université ou une école technique de deux ou quatre ans et je retire mon enfant de la FAFSA / NJAFSA pour le moment.

Signature du parent / tuteur : \_\_\_\_\_ Date : \_\_\_\_\_

Signature de l'élève : \_\_\_\_\_ Date : \_\_\_\_\_

**Pour usage de bureau seulement :**

Nom et prénom du conseiller : \_\_\_\_\_

Signature du conseiller : \_\_\_\_\_ Date : \_\_\_\_\_

Nom et prénom du directeur : \_\_\_\_\_

Signature du directeur : \_\_\_\_\_ Date : \_\_\_\_\_

Date de la conférence : \_\_\_\_\_

*KL*



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# Newark Board of Education

Where Passion Meets Progress

## Fòmilè Egzanpasyon FAFSA/NJAFSA

Enstriksyon: Ou dwe ranpli fòmilè sa a epi pou soumèt li bay konseye lekòl pitit ou a pandan pitit ou a nan ane klas tèminal li pou yo kapab egzante l de FAFSA/NJAFSA.

### Enfòmasyon sou Elèv la:

Lekòl Segondè: \_\_\_\_\_

Non Elèv la: \_\_\_\_\_ Idantifikasyon Elèv la: \_\_\_\_\_

Dat Nesans Elèv la: \_\_\_\_\_

Antanke paran an oswa responsab legal la, mwen li enfòmasyon yo bay sou FAFSA/NJAFSA yo epi mwen konprann avantaj pitit mwen an ap jwenn lè li ranpli fòmilè FAFSA/NJAFSA a. Mwen chwazi pa mande pitit mwen an ranpli okenn nan aplikasyon yo nan kad egzijans pou gradyasyon an.

Mwen konprann lè pitit mwen an ranpli aplikasyon sa yo, sa ogmante opòtinite pou li kapab patisipe ak boukle yon etid inivèsite oswa lekòl teknik ki dire de (2) lane, kat (4) lane epi m ap retire pitit mwen nan FAFSA/NJAFSA pou moman sa a.

Siyati Paran/Responsab Legal la: \_\_\_\_\_ Dat: \_\_\_\_\_

Siyati Elèv la: \_\_\_\_\_ Dat: \_\_\_\_\_

### Pou Itilize nan Biwo Sèlman:

Non Konseye a: \_\_\_\_\_

Siyati Konseye a: \_\_\_\_\_ Dat: \_\_\_\_\_

Non Direktè a: \_\_\_\_\_

Siyati Direktè a: \_\_\_\_\_ Dat: \_\_\_\_\_

Dat Konferans lan: \_\_\_\_\_

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