

Boosting FAFSA Completion to Increase Student Success

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The transition from high school to postsecondary education is one of the most important points in a student's educational journey. Yet, as students attempt to navigate the many steps involved in accessing postsecondary education, it is also a juncture where students are most at risk of falling off track. The responses to the COVID-19 pandemic — including school closures, social distancing guidelines and stay-at-home orders — have made this transition point even more fraught.

One major question for students in the midst of this transition revolves around affordability: Will they be able to receive the financial support that enables them to pay for tuition, fees and other living expenses associated with being a postsecondary student? In order for students to receive the information that will allow them to answer that question, they must take a key step: filling out the Free Application for Federal Student Aid.

Filling out the FAFSA allows students to learn whether they are eligible to receive federal financial aid; many states use the FAFSA to determine student eligibility for state financial aid programs as well. Currently, far too few students are taking this crucial step; researchers estimate students are missing out on [\\$24 billion in federal and state grants, subsidized loans and work-study funding](#) each year because they are eligible for aid but do not complete the FAFSA.

EQUITABLE TRANSITIONS THROUGH PANDEMIC DISRUPTIONS

This Policy Brief is one of six dedicated to various facets of the transition from secondary to postsecondary education, now complicated by the COVID-19 pandemic. It focuses on the populations already underserved in our nation's education system. The series — which builds upon [“A State Policymaker's Guide to Equitable Transitions in the COVID-19 Era”](#) — provides actionable steps and examples for state policymakers to consider as they address the transition from high school to college and the workforce. The other Policy Briefs in the series are:

- [“Expanding High-Quality Work-Based Learning”](#)
- [“Prioritizing Equity in Dual Enrollment”](#)
- [“Policy Solutions That Foster Competency-Based Learning”](#)
- [“Modernizing Math Pathways to Support Student Transitions”](#)
- [“Establishing a State-Level Postsecondary Advising Network”](#)

Inequitable Distribution of Completion Barriers

Even before the disruptions caused by the pandemic, certain groups of students faced significant barriers that made it more difficult for them to complete the FAFSA — namely students who struggle to access their parents’ financial information, broadband internet or college counselors, as well as students who face language barriers. It is important to note that students experience these barriers in an intersectional way — their ability to complete the FAFSA is often affected by multiple factors.

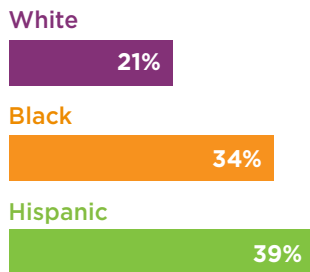
One potential barrier to FAFSA completion stems from the form’s requirement for parent financial information. The U.S. Department of Education established a [number of exemptions](#) for students who are unable to access parent information — for example, students whose parents are incarcerated or students who left home because of an abusive family environment. Students must be made

aware of these exemptions and the additional steps required to access them, which include working with financial aid officers at their institution to provide documentation about their family situation. In addition, students who submit limited FAFSA information under such exemptions may not be eligible for all financial aid program options.

Students without access to broadband internet, or to a desktop or laptop computer, make up another group that faces FAFSA completion barriers. For many students, the only available internet access is through a cell phone or other mobile device. Although steps have been taken to make the FAFSA available in a [mobile-friendly format](#), it can be difficult for students to collect all of the information needed to complete the form — such as tax-return information — through a mobile interface.

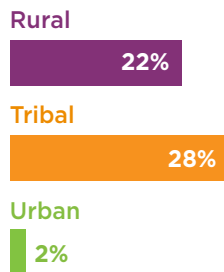
Digital Divide

Students Who Do Not Have Broadband Access at Home, Disaggregated by Race



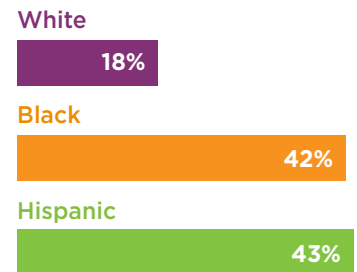
Source: [Pew Research Center Survey](#), 2019

Students Who Do Not Have Broadband Access at Home, Disaggregated by Geography



Source: Federal Communications Commission, [2020 Broadband Deployment Report](#)

Students Who Do Not Have a Desktop or Laptop Computer, Disaggregated by Race



Source: [Pew Research Center Survey](#), 2019

Students who lack access to high-quality postsecondary advising and counseling are also more likely to face FAFSA completion barriers. Counselors play a [key role](#) in helping students complete the FAFSA — both by building momentum for a college-going culture that convinces students that they can pursue postsecondary education, and by providing individualized guidance to help students navigate the form’s requirements. Yet, school counselors are often responsible for providing guidance to large numbers of students, which can affect counselors’ ability to give individualized advice on FAFSA completion.

Although the recommended student-to-counselor ratio is 250:1, the [actual national average student-to-counselor ratio](#) is 482:1. Students who live in low-income households and students of color are more likely to attend schools where counselors are responsible for serving [especially large numbers of students](#). Counselors at schools where over 75% of students qualify for free or reduced-price lunch, as well as those at schools with higher proportions of students of color, often have larger average caseloads than their counterparts.

The COVID-19 pandemic has exacerbated the equity gaps that result from these existing barriers to FAFSA completion. In particular, it has magnified the effects of the digital divide; because of school closures, students without home access to devices or broadband internet are no longer able to use computer labs and other resources available at their school to fill the gap. This is especially relevant because many events to support FAFSA completion were previously held at school or library

computer labs.

The pandemic has also hindered the ability of college counselors to provide guidance to their students, an issue that is more challenging for counselors with large caseloads. Although there are bright-spot [examples](#) of some college advisors successfully transitioning to online or remote delivery of their services, these efforts have generally been led by groups, such as [College Advising Corps](#), that can support the logistics of setting up online advising platforms.

The ways that the pandemic has affected families across the country — including the disproportionately high [rates of hospitalization](#) among Black, Latinx and Indigenous communities — also exacerbates FAFSA completion inequities.

Policy Strategies to Support Completion

As state policymakers — and governors’ offices in particular — consider ways to support high school students who are trying to navigate the transition to postsecondary education in the midst of the pandemic, they may wish to consider policy strategies taken by other state leaders to support FAFSA completion. Given the ways in which the pandemic has exacerbated the disadvantages for students who already faced barriers to completing the FAFSA, policy strategies should target Black and Latinx students, students who live in low-income households, and students who live in rural communities or on Tribal lands.

Although a number of states and cities have

developed various initiatives to support FAFSA completion, two particular states have achieved gains in statewide FAFSA completion rates: **Louisiana** and **Tennessee**. For the last three years, these two states — where FAFSA completion rates are significantly higher than other states — have been engaged in a friendly competition to achieve the highest rate of high school seniors who complete the FAFSA. Because of the standout performance of Louisiana and Tennessee in this area, the examples in this section focus on how these two states have implemented versions of the policy strategies described.

Mandatory Completion Requirements

In order to raise statewide FAFSA completion rates, some state policymakers have adopted the strategy of requiring students to complete the FAFSA as a condition of graduating high school or qualifying for state scholarship and financial aid programs.

STATE EXAMPLES

In 2015, **Tennessee** Gov. Bill Haslam signed legislation that established [Tennessee Promise](#), a last-dollar scholarship program that allows recent high school graduates an opportunity to earn two years of college credit toward an associate degree or certificate without paying tuition or fees. In order to be eligible for a Tennessee Promise scholarship, students must fill out the FAFSA by a certain date. Any scholarship awards are then calculated based on the other sources of aid that they receive. Tennessee Promise builds on a [comprehensive agenda](#) of postsecondary education reform policies designed to narrow the attainment-rate gaps between Tennessee and the national average; it also spurred

[further growth](#) in state FAFSA completion rates.

Also in 2015, the **Louisiana** Board of Elementary and Secondary Education [established a policy](#) that requires all high school seniors to fill out the FAFSA in order to graduate. Students can receive an exemption from this requirement either by applying for a state scholarship program or by submitting a waiver. To allow districts and schools time to prepare for the new requirement, the policy did not take effect until the 2017-18 school year. In the first year of implementation, the proportion of high school seniors who completed a FAFSA showed a dramatic [25.9 percentage point](#) increase. Over the past few years, Louisiana and Tennessee have competed for the highest FAFSA completion rates [in the nation](#).

More recently, Gov. Greg Abbott enacted a [2019 bill](#) from the **Texas** Legislature that included provisions requiring public high school students to fill out the FAFSA in order to graduate. Similar to Louisiana's policy, students in Texas can receive an exemption if they apply for state financial aid programs or submit an opt-out form. The policy is scheduled to take effect in the 2021-22 school year, and the Texas Education Agency has established an advisory committee to make recommendations on how the state will provide supports to meet the new requirement.

The COVID-19 pandemic has affected these policy strategies in a number of ways. In **Louisiana**, state leaders decided to waive the FAFSA completion requirement, but Louisiana Office of Student Financial Assistance (LOSFA) continued to provide supports to students who had not yet completed the form. Although

Tennessee's overall FAFSA completion rate was not significantly affected by the pandemic because the state set an early-filing deadline of Feb. 1 for Tennessee Promise, the ability of state leaders to provide follow-up support to non-completers has been hindered by school closures. Although the policy in **Texas** was not affected by the pandemic because it had not yet gone into effect, social distancing requirements have impacted the state's ability to plan for the requirement, which could potentially result in a delay of the policy's implementation date.

Targeted Support Services

Without support to encourage compliance, a FAFSA completion requirement could result in a wider equity gap. Encouragingly, all states that have required FAFSA completion for high school graduation or state financial aid — as well as many states that have not mandated such requirements — have set up supports that help students and their families meet the new requirements. Although these supports may not be formally codified in legislation, state leaders have used their convening authority to bring stakeholders together and develop structures to help students complete their applications. While many of these support services are designed to reach high school students or those applying for state financial aid, policymakers can also consider the needs of the wider universe of students who could benefit from completing the FAFSA — including adult learners seeking to re-engage with postsecondary education.

STATE EXAMPLES

One key state strategy has been to bring students to collective spaces, such as computer labs, so they can use the devices

and broadband access to complete the FAFSA with support. In **Tennessee**, [tnAchieves](#) — an organization that supports the scholarship and mentoring aspects of the Tennessee Promise program — helps high school counselors host TN FAFSA Frenzy events where students fill out the form. The [toolkit for school counselors](#) suggests that they “reserve a computer lab or a room and a set of laptops for your event.” **Louisiana** adopted a similar approach that is administered through the LOSFA, which holds [FAFSA completion events](#) across the state in either a dedicated computer lab or a library that provides access to computers.

This strategy of convening students in common spaces is not currently possible given school closures and social distancing requirements brought on by the pandemic, which complicates efforts to target FAFSA completion supports to students affected by the digital divide. Regardless, the need to increase student access to broadband and non-mobile devices is a real and timely concern, which will require creatively adapting to current constraints.

Another common state strategy has been to offer individualized counseling for students who are navigating FAFSA requirements. In **North Carolina**, which requires students to complete a FAFSA in order to receive state-based financial aid but not as a condition of graduating high school, the College Foundation of North Carolina (CFNC) collaborates with communities across the state to provide in-person completion support annually on [FAFSA Day](#). In addition to schools offering on-site support, branches of the North Carolina State Employees' Credit Union train their staff in FAFSA filing and are open to the public to help families complete the

form. In response to the COVID-19 pandemic, [myFutureNC](#) launched FAFSAFrenzyNC during which [virtual live FAFSA Q&A sessions](#) were held with college counselors in English and Spanish. These sessions were made possible through partnerships with [College Advising Corps](#) and CFNC. The overall FAFSAFrenzyNC initiative is supported by the state's K-12 and higher education sectors and a number of postsecondary education organizations, including The Hunt Institute.

These strategies specifically target students who are affected by the digital divide and/or who have language barriers. However, some aspects of the suite of FAFSA support strategies used by states, such as marketing campaigns on social media and other platforms, are more universally aimed at all students. Such strategies might benefit from additional consideration to ensure they are specifically targeted toward the students who face the greatest FAFSA completion barriers.

Real-Time Completion Data

To target support strategies in communities where they are needed most, state leaders can explore ways to get real-time disaggregated FAFSA completion data in the hands of practitioners. To produce such actionable data, there are a number of fundamental steps that state leaders can take to share and link data across state agencies.

State leaders may consider creating mechanisms to match FAFSA completion data with student demographic information in real time and disseminate such information (while protecting student privacy and data security) to the people who can target supportive interventions. This strategy would allow for efforts to be targeted in very specific ways

that would have clear effects on equity gaps: Instead of trying to reach a broad, statewide community of certain students, counselors and other leaders would be able to see which schools had the biggest equity gaps among certain student groups and then target resources accordingly.

The challenges regarding data governance structures, State Longitudinal Data Systems, timeliness of data and research agendas are too numerous to detail in this Policy Brief. However, there are valuable resources available from groups — such as the U.S. Department of Education's SLDS [State Support Team](#) and the [Data Quality Campaign](#) — that would be useful for policymakers exploring this area. Although integration of data systems can be challenging work, and many of the policies that would create a more robust SLDS will require some level of investment in order to achieve their intended outcomes, state leaders have shown that it is possible to build a comprehensive SLDS that can inform policy decisions.

STATE EXAMPLES

States have made efforts to publicize real-time information about FAFSA completion that can be used by counselors and other practitioners to target their efforts. One example is **Louisiana's** [Compete to Complete FAFSA Challenge](#), a publicly accessible website that shows updated data on the overall percentage of FAFSA completions at the state, district and high school levels. In **Tennessee**, the agency that administers the Tennessee Promise program shares information with high school counselors about the FAFSA completion status of Promise applicants through school-specific data visualizations on a regular basis.

Requests for Reconsideration of FAFSA Financial Aid Packages

When a student fills out the FAFSA, they receive a financial aid award package that extends through the academic year. If a student experiences a change in their financial circumstances and would like to request a reconsideration of their financial aid package, they must work directly with their institution's financial aid office to submit a request. Financial aid administrators have the discretion to exercise [professional judgment](#) on a case-by-case basis to make adjustments to a student's financial aid package by changing the student's financial-data inputs — often based on financial information from two years prior to submission — that were originally used to complete the FAFSA form.

Professional judgment decisions are made within the context of available resources at both the institutional and state levels. The pandemic jeopardized the availability of institutional and state resources to provide aid and led to widespread job losses, causing sudden changes in family financial situations. Therefore, although financial aid officers now have access to a [suite of resources](#) to guide them on the most appropriate ways to exercise professional judgment — and will likely receive many more requests for professional judgment in the coming year — the pressure that the pandemic has placed on state and institutional budgets may affect the ability of financial aid administrators to make decisions that result in students receiving additional aid.

This context is an important consideration for governors' offices and other state leaders thinking about the pandemic's effects on postsecondary affordability. Although professional judgment decisions are made at the institutional level, governors' offices and other state policymakers may consider whether requests for professional judgment considerations could be used as a mechanism to identify students and families in need of targeted pandemic relief. Such relief could be provided through federal stimulus funding, including the programs authorized by the Coronavirus Aid, Relief and Economic Security Act. State leaders may also consider taking steps to raise awareness among students and families of the professional judgment option and guidance on how to submit such requests.

Final Thoughts

Governors' offices and other state leaders who seek to mitigate the ways that the COVID-19 pandemic has affected the transition from high school to postsecondary may consider exploring the FAFSA completion policy strategies highlighted in this Policy Brief. Helping students receive the financial aid that

they are already qualified for may sound like a straightforward task, but there are a number of complex issues for policymakers to consider when crafting FAFSA completion policies — especially as they work to ensure that supports are targeted to the students who face the most significant barriers.



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