



FAFSA First: Requiring the FAFSA for High School Graduation FAQ

1. Which states have adopted or enacted FAFSA completion requirements or similar legislation as of February 24, 2020?

Enacted: *Illinois, Louisiana, Texas*

Pending: *California, Oklahoma, Nebraska, Missouri, Kentucky, Indiana, New Jersey, Maryland, Hawaii*

Failed Sine Die: *Michigan**, *District of Columbia*

**Can be taken up by committee at any point during a two-year term*

2. What are some policy trends in relation to governance for the FAFSA completion requirement?

Many state bills give regulatory authority to state agencies while some do not explicitly address this in their legislation. Governing authority is an important consideration as a regulatory body must regulate any opt-out/waiver processes. Louisiana's policy was implemented by the Board of Education using rulemaking authority, rather than through legislation.

3. What are some major considerations for states interested in implementing a FAFSA completion policy?

- While implementing a FAFSA Completion requirement will likely lead to increased FAFSA submission rates, it is important for states to consider how this may be effective in increasing completion rates, especially by specific city areas and demographics. This should be specifically addressed and articulated in any policy developed.
- States should consider the intersection with institution-level admissions and awarding processes when considering implementing a FAFSA Completion requirement. This predominantly impacts the postsecondary spectrum.
- States interested in developing a FAFSA completion requirement should develop an outreach and support system for the policy including increased or refocused resources for implementation.
- States interested in developing a FAFSA completion requirement should provide specific and intentional support for students that opt-out of the requirement, especially vulnerable populations such as undocumented students, foster-care youth and students in the justice system, etc.
- States should provide equitable support to school districts making sure every district within the state has access to resources to be effective in implementing the FAFSA Completion requirement.

4. May counselors or administrators exempt a student from the FAFSA completion requirement?

In Louisiana, a counselor or administrator has the authority to exempt a student from meeting the FAFSA completion requirement. However, this varies across the proposed legislation in other states. Additionally, parents, students over 18, and emancipated minors can opt-out according to various policies. Superintendents, school boards, districts, principals and counselors can exempt a student from the requirement as articulated in the policy.

5. If a student is not income-eligible for financial aid, would they still be required to fill out the FAFSA Form?



Louisiana’s policy and many of the other state proposals allow students to apply for and receive a waiver from the FAFSA requirement. Students who do not anticipate qualifying for aid due to income or who are concerned about privacy may apply for and receive a waiver.

6. Is the FAFSA requirement in place for public students or all students?

It varies across states, but in most states enacted and proposed bills, the requirement applies to public school and charter school students only.

7. Are schools keeping a physical copy on file of the FAFSA submission? And if so, how?

From our understanding, states are not retaining physical copies but request a confirmation of completion.

8. Like Louisiana, our state uses FAFSA as the primary state financial aid application. However, our deadline is March 1. Do you find many students completing the application later in the spring and into the summer?

Louisiana has seen a constant increase in completion during October-May over the last three years of tracking. Their state aid deadline is 7/1, but state representatives believe that the steady increase is due to the articulated submission deadline occurring prior to the student’s graduation in May. Louisiana continues to see an increase in completions beyond May, but not at a similar rate as during the school year.

9. Do FAFSA Completion policies lead to an increase in student utilization of financial aid?

After the FAFSA requirement was first implemented in AY 2017-2018, Louisiana saw an increase in the percentage of students receiving PELL and state-based financial aid the following year.

Financial Aid: Annual Unduplicated Undergraduate Headcount	AY 2009-10	AY 2014-15	AY 2015-16	AY 2016-17	AY 2017-18	AY 2018-19
% of Undergraduates on Pell	31.6%	36.8%	35.8%	36.8%	36.5%	39.1%
% of Undergraduates on TOPS (LA Students Only)	18.0%	23.1%	24.7%	25.1%	24.6%	26.1%
% of FTF on Tops (LA Students Only)	28.1%	41.3%	44.9%	44.8%	45.5%	48.3%
Number of Student on Tops Tech	1,016	1,633	1,673	1,280	1,436	1,560
Number of Students on GO Grants	23,827	23,899	26,859	25,053	23,238	25,566

10. How can I receive additional assistance from ECS?

You can contact Sarah Pingel (spingel@ecs.org) or Shanique Broom (sbroom@ecs.org) or submit a [Request for Assistance](#) found on the Education Commission of the States webpage.