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FAFSA Completion Trends and How State Initiatives Impact High School Student FAFSA
Completion Rates

by

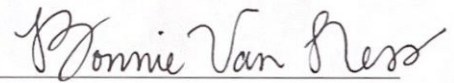
Joseph Sepp Cecil

A thesis submitted to the faculty of The University of Mississippi in partial fulfillment of the
requirements of the Sally McDonnell Barksdale Honors College.

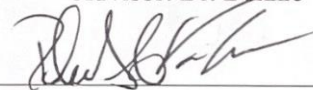
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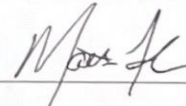
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Reader: Dr. Martin Fisher

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Acknowledgements

I would like to thank the Sally McDonnell Barksdale Honors College Faculty and Dr. Bonnie VanNess for their assistance throughout the process of developing my thesis. I would also like to thank my friends and family for their continued support throughout my education.

Thank you, Dr. Martin Fisher, and Dr. Robert VanNess for contributing your time and talents towards my efforts to graduate from the Sally McDonnell Barksdale Honors College.

Congratulations, Christian, on finishing your first year at Ole Miss!

Abstract

Joseph Sepp Cecil: FAFSA Completion Trends and How State Initiatives Impact High School Student FAFSA Completion Rates

Multiple studies report that financial aid increases access to higher education and the probability that a student persists to graduation (Li et al., 2022). Two major reasons for students failing to complete the Free Application for Federal Student Aid (FAFSA) are the belief that they will receive no aid, and that the application process is too complicated (Sallie Mae and Ipsos, 2022). Not completing the FAFSA leads to students missing out on federal and state funds that they might have otherwise received. Not receiving financial aid can sway students who believe they cannot afford college against attending college (NCES 2022-057). Students who complete the FAFSA will have a higher rate of attending college than their peers who do not complete the FAFSA even if they do not receive financial aid (Granville, 2022).

Total national FAFSA submissions were 80% in 2015, continually declined until reaching their lowest point of 68% in 2021, and have rebounded by 2% to 70% submission rates as of 2022 (Sallie Mae and Ipsos, 2022). Over the last three years, FAFSA submissions have shifted from being largest from October to December, to being heavier in the spring (Bill DeBaun, 2021). The shift in submissions later into the application period is supported by data shown from Louisiana, Texas, Illinois. These three states have seen this shift due to their mandatory FAFSA completion requirements which incentivize some students to complete the application near May to fulfill a graduation requirement (Granville, 2022).

Eight states currently have policies in place that make FAFSA completion mandatory/highly incentivized at some level (Granville, 2022, and Hughes, 2022). Texas, Louisiana, and Illinois were

early adopters, and were then followed by Alabama; These four states have shown significant increases in state wide completion rates. Increases in completion were recorded to be as high as 26% in the first year of policy enactment and serve as tests to see what methods encourage students to complete the FAFSA. National data shows that low income and high minority schools can have college enrollment and FAFSA completion rates up to 13 times more volatile than high income and low minority schools as well as the impact of FAFSA on the perceived affordability of college attendance (Bill DeBaun, 2021). It was found that 57% of families over estimate the cost of attendance at a four-year public university in their state by greater than 25% and that FAFSA completion could help lower this number by showing students federal and state opportunities to receive financial aid (Veles, Horn, NCES 2019-404).

From my research, I recommend that states should create financial incentives for counties, school districts, and schools supporting efforts to increase FAFSA completion, implement clear reporting guidelines, develop benchmarking tools, and increase state, non-income based, student aid programs. These recommendations are currently prevailing trends in states with the highest increases in FAFSA completion rates and those which have produced results that continue to outperform many other states.

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Frequent Terms

AY – Academic Year

EFC – Expected Family Contribution

COA – Cost of Attendance

NCAN – National College Attainment Network

IES – Institute for Educational Sciences

NCES –National Center for Education Statistics

LEA(s) - Local Educational Agency/Agencies

Title I – 40% or more of the student body is from a low-income household

What is FAFSA

The Free Application for Federal Student Aid (FAFSA) is an application through the US Department of Education, which provides more than \$112 Billion in federal aid to approximately 13 million students. The FAFSA asks over 100 questions including tax information, and college attendance plans (Kagan, 2022). The application period is 21 months starting on October 1st, the year before a student plans to attend college, and ending June 30th at the end of the year for which a student is seeking financial aid. Aid availability is first-come, first serve. The difference between a student's university of choice's cost of attendance (COA) and family's Expected Family Contribution (EFC) is taken, giving the estimated financial need for a student. The estimated financial need is used to determine if a student should receive federal student aid (FederalStudentAid.org).

If there is an indication of need-based student aid, the following programs could become available: Federal Supplemental Educational Opportunity Grant (FSEOG), Direct Subsidized Loan, Federal Work-Study, and the Federal Pell Grant. The measure of financial need is used by all federal need-based student aid, except for the Pell Grant (Kantrowitz, 2022b). An undergraduate student may be awarded a Pell Grant up to a maximum of \$6,895 per year for approximately six years or twelve terms (FederalStudentAid.org). The Pell Grant awards the highest amount per year, per undergraduate student, compared to all other Federal aid programs.

Expected Family Contribution is the only factor that the Federal Pell Grant uses to determine if a student is eligible to receive funds. Mark Kantrowitz's (2022a) article, *What is the Expected Family Contribution (EFC)*, describes what [EFC](#) is and how it is applied. [EFC](#) is the amount that a family should be able to pay in per year college expenses including tuition, books, supplies, accommodations, and transportation. After this number is calculated, it is used to

determine if and how a student’s financial aid package should be created. The closer the [EFC](#) is to zero, the greater the available aid. Students will receive the Pell Grant if their [EFC](#) is less than 90% of the maximum Pell Grant award and students with an [EFC](#) of zero will be granted the maximum Pell Grant (Kantrowitz, 2022a). Kantrowitz also reports that the average [EFC](#) among Pell Grant recipients is around \$700. Because [EFC](#) does not consider students’ cost of attendance, only family income and assets, students who attend higher cost institutions may exhibit financial need, but will not receive the Pell Grant.

Figure 1: Financial Need Broken Down by COA and Income (Kantrowitz, 2022b)

Type of College	Cost of Attendance	Financial Need for Low Income	Financial Need for Middle Income	Financial Need for High Income
Community College	\$18,420	\$16,645	\$8,195	None
In-State Public 4-Year College	\$26,590	\$24,815	\$16,365	None
Out-of-State Public 4-Year College	\$42,970	\$41,195	\$32,745	\$4,275
Private Non-Profit 4-Year College	\$53,980	\$52,205	\$43,755	\$15,285

Note: The estimated Cost of Attendance (COA) for a Community College, In-State Public 4-Year College, Out-of-State Public 4-Year College, and Private Non-Profit 4-Year College is compared to income of “Low, Middle, and High” earners and demonstrates the estimated financial in each scenario. The COAs used are based on national averages reported from the College Board’s Trends in College Pricing 2019.

Kantrowitz (2022b) provides an example in Figure 1 above showing how the use of [EFC](#) to determine a student’s financial aid eligibility without considering [COA](#) can negatively impact students who choose to attend higher cost institutions. One way that Kantrowitz demonstrates the negative impact is by using a student with an [EFC](#) of \$38,695 (High Income). A High-Income Student is not in financial need at a community college with a cost of attendance of \$18,420, but requires an additional \$15,285 to cover the [COA](#) of a private non-profit 4-year college that costs \$53,980 (Figure 1). He states that “Financial need depends not just on income, but also on the cost of the college attended by the student” (Kantrowitz, 2022b). The table above clearly shows that all

income levels in this example require some level of financial assistance to attend out of state and private four-year universities aid to fully afford in-state and community colleges.

For all other federal need-based student aid, the definition of Cost of Attendance is extremely important in determining the true financial need of a student. Kristin Schaffer (2020) with *Saving for College* states that there are four different student budgets universities typically provide to help students estimate their cost of attendance. These include: students who live on campus in college owned or operated housing, students who live off campus in an apartment, students who live off campus with their parents, and students who live in military housing (Schaffer, 2020). Schaffer classifies tuition, required fees, room and board, and books and supplies as direct costs, while transportation, computers, personal expenses, and loan fees are classified as indirect costs. With four different budgets, students can more accurately see what their cost of attendance might be depending on which direct and indirect costs they anticipate incurring. Some colleges will use surveys to determine an average cost of attendance, others adjust previous years [COA](#) by inflation, and some use College Board data (Schaffer, 2020). Differences in how colleges estimate these costs can greatly impact each university's projected [COA](#) and students' ability to qualify for financial need-based aid.

FAFSA Data Collection and Comparison Challenges

Comparing data year-to-year collected by FAFSA presents challenges due to past policies, lack of defining questions, and recent changes. Two notable issues are FAFSA's identification of high school seniors and how/when the number of high school seniors are counted.

Identifying and Counting High School Senior FAFSA Submissions

Being able to identify high school seniors allows a researcher to observe trends in college attendance and keep a consistent basis on the population of people being comparing. For example, when determining why FAFSA applications have increased, it is important to know if the applications increased because there are more high school seniors graduating in a particular year or if the number of applicants increased as a percent of the total number of students graduating per year. If numbers are not adjusted to show FAFSA application increases or decreases as a percent of the total number of graduates, it could be misleading or incorrect to conclude that application numbers are getting “better” or “worse.”

The impacts of poor economic times on increased college attendance of adults has emphasized the importance of being able to separate high school seniors from adult students; According to Reeves and Guyot’s (2018) report “FAFSA Completion Rates Matter: But Mind the Data,” there was no way to discern which applications were from seniors before 2017. Due to the FAFSA policy change in 2017, the age of the applicants began to be recorded, identifying high school seniors as people “no older than... 19” (Reeves & Guyot, 2018). The policy change allows researchers to see trends more clearly in FAFSA completion rates by high schoolers and its impacts on college attendance. The report also notes the impact of smaller high schools being left out of the count, stating that high schools with under five applications are not counted. Although omitting high schools with fewer than five applications does not largely skew the total number of high school senior submissions, it can hinder the ability to track rural application completion trends.

Counting Highschool Students

Identifying the number of students at every high school is another issue that affects a researcher’s ability to compare data. During Reeves & Guyot’s (2018) discussion on when student numbers are collected and released by high schools, they reported that the Common Core of Data,

the Department of Education’s primary database on public elementary and secondary education in the US, reports enrollment on October 1.” Although high school enrollment is to be reported on October first, some high schools use first week attendance, three-month averages, or do not abide by this October first guideline, using other incorrect counting methods to report student numbers. Comparing data from October and April of the same year yields vastly different high school student enrollment rates and can show artificially high, or low, numbers.

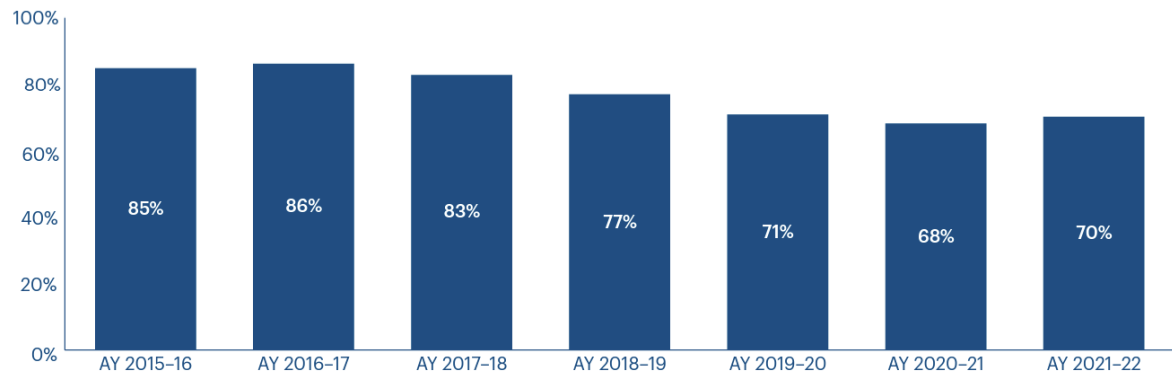
Reeves and Guyot (2018) emphasize the importance of proper high school senior reporting through the case study of Greensboro, North Carolina. A grantee in Greensboro reported their high school enrollment in the ninth month of the school year, while Cheyenne, Wyoming reported properly. Greensboro won the National College Attainment Network ([NCAN](#)) FAFSA completion challenge by having a higher FAFSA completion rate and larger increase in completions compared to Greensboro’s competitors. Brookings’ research recalculated high school attendance, adjusting Greensboro’s enrollment back to October first, and found that Cheyenne should have won the [NCAN](#) FAFSA completion competition (Reeves & Guyot, 2018). Ensuring the correct number of high school seniors is reported for the correct time period is imperative to compare FAFSA data confidently and correctly. Data must be comparable and accurate so researchers can extrapolate it to show political, social, and economic impacts on high school FAFSA completion and college attendance.

Current FAFSA Completion and Trends

Sallie Mae, the US’s largest student saving, planning, and paying for college company, partners with Ipsos each year to release the *How America Pays for College* report. For the 2021-2022 Academic Year, they report that approximately 70% of families with a student attending college completed the FAFSA application. Of the 30% of families that did not complete the

FAFSA, the main reasons were believing their family's income was too high to qualify for any financial aid (36%) and that the application was too complicated (17%) (Sallie Mae and Ipsos, 2022). It is also estimated that one third of high school students who do not apply are eligible Pell

Figure 2: Families Completing the FAFSA by Academic Year (AY) (Sallie Mae and Ipsos, 2022)



Note: Percentage of families completing the FAFSA from academic year (AY) 2015-2016 to AY 2021-2022.

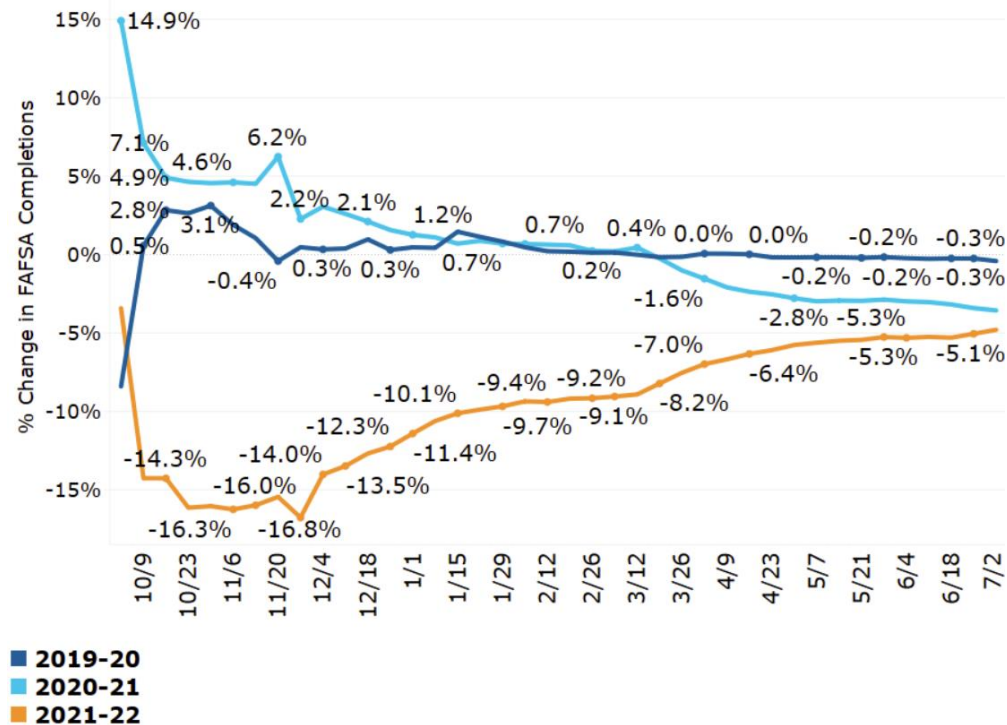
Grant recipients (Reeves & Guyot, 2018).

In Figure 2, Ipsos shows a nearly consistent decline in FAFSA application numbers from 86% completion to 70% from Academic Year (AY) 2015-2016 to [AY](#) 2020-2021 with a 2% increase from [AY](#) 2020-21 to [AY](#) 2021-22. FAFSA completion levels as shown in Figure 2 resulted in approximately \$30 Billion of apportionments by the US Department of Education in 2021, solely from FAFSA related student financial assistance. Although many families believe that they will not receive financial aid, The Century Foundation reports that students do not claim an average of \$2,297 per student in federal grant aid by not completing the FAFSA each year (Granville, 2022).

The number of FAFSAs completed is a more accurate measure of how many students are receiving federal aid; Unfinished or incomplete applications cannot receive award offers. By using the number of completed FAFSAs rather than the number of submitted FAFSAs, researchers can better show the impact of federal student aid. According to National FAFSA Tracker, the average

FAFSA completion rate per state as a percentage of high school seniors as of March 3, 2023 is 41.98% with a median of 41.7%. The state with the highest completion is Tennessee with 61.9%

Figure 3: Year-Over-Year Percent Change in Monthly FAFSA Completion (Bill DeBaun, 2021)



Note: A line depicts the change in FAFSA completions reported each month in the subject year compared to the same month in the previous year. The selected subject years are 2020, 2021, and 2022.

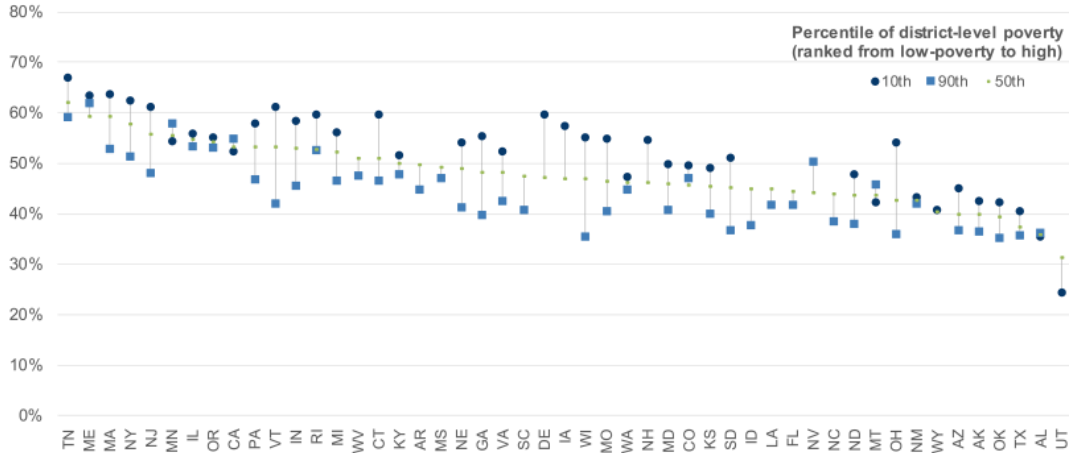
and the lowest completion rate is Alaska with 20.4%, preceded by Utah with 28.6% (National FAFSA Tracker, 2022).

The National College Attainment Network ([NCAN](#)) shows the changes in FAFSA completion from 2019 to 2022, separated by month in Figure 3. The 2021-22 comparison period saw an overall decrease in FAFSA completions with a maximum monthly change -16.8% and minimum monthly change of -5.1%. Figure 3 also shows that students are, on average, completing the FAFSA later in the year during the 2021-22 comparison period. In the 2021-22 comparison period, the percent change in FAFSA completions are increasing at a decreasing rate through time. Higher negative changes in FAFSA completions during the fall and lower negative changes in the

spring indicate that students are waiting longer to complete the application. Student uncertainty about attending college could partially influence the shift of application completions closer to high school graduation in the spring/summer. The skew towards spring could also have been caused by state incentives (mentioned later in this paper under [*State Initiatives to Increase FAFSA Completion*](#)) making FAFSA completion mandatory for high school seniors to graduate (Granville, 2022). States requiring seniors to complete the FAFSA are found to have FAFSA completion numbers skewed closer to May. The delay seen in mandatory FAFSA completion states could be caused by students who only complete the application to fulfill the graduation requirement.

During academic year (AY) 2020-21, many universities implemented full or partial online teaching. The National Center for Education Statistics ([NCES](#)) reported that 84% of undergraduate students had at least one of their classes moved to online-only instruction during spring 2020, which could account for the decreases in FAFSA completions during [AY](#) 2020-21 ([NCES](#), 2021c). Due to universities' switch to online-only instruction, high school seniors' pessimistic outlook on higher education could have caused a decrease in FAFSA completion rates and have delayed when high school seniors were submitting their applications.

Figure 4: High-Poverty Districts Tend to have Lower FAFSA Completion Rates (Reeves & Guyot, 2018)



Source: Page, Lindsay, Danielle J. Lowry, Aizat Nurshatayeva. "An Examination of the Relationship between School District FAFSA Completion Rates and District Poverty Levels." National College Access Network, April 2017. Table 2.

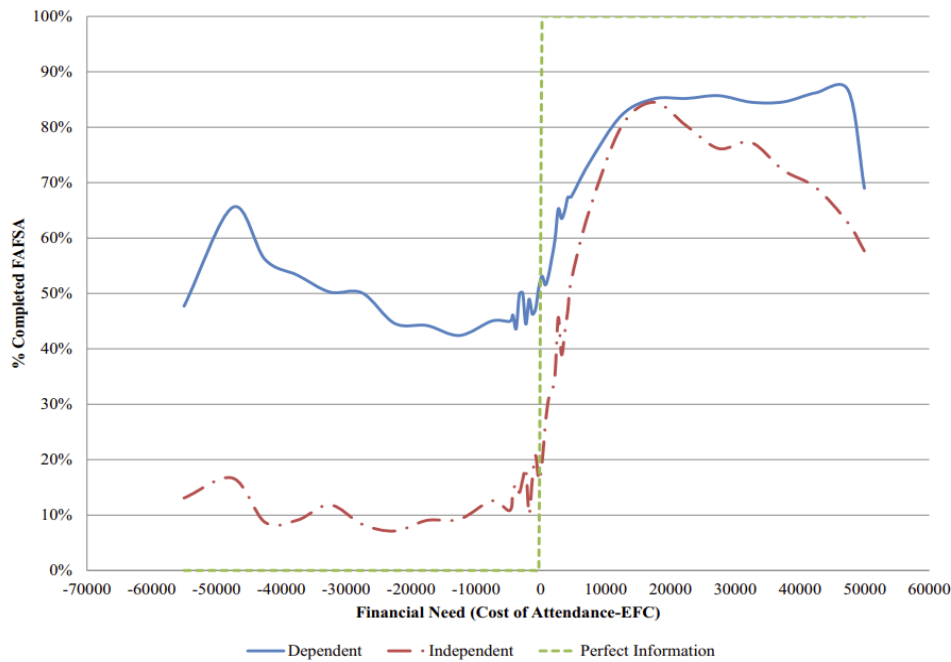
Note: Estimates are missing for states without districts meeting the given national percentiles of poverty.

BROOKINGS

Note: FAFSA completion rates are separated by state and income. The 10th percentile of earners are classified as high income. The 90th percentile of earners are classified as low income. Completion rates for the 10th, 90th, and 50th percentile groups in each state are plotted. States are ranked highest to lowest from left to right by the completion rate of the 50th percentile in each state.

When looking at the demographics of those completing the FAFSA, low-income students are expected to be the highest percentage. Reeves & Guyot's 2018 report (Figure 4) shows that, in all but four states (Minnesota, California, Montana, and Alabama), more students with families in the highest 10th percentile of earners consistently completed the FAFSA than students with families in the lowest 90th percentile. Figure 4 also shows that both high and low earners have relatively high completion rates in a few states. Just under 60% of Tennessee's 90th percentile students completed the FAFSA, which is higher than almost every states' 50th percentile, and higher than many states' 10th percentile (Reeves and Guyot, 2018). This inequity unveils inefficiencies in the application system and leads to the question of why students most eligible for aid are not completing the FAFSA.

Figure 5: Percent Completed FAFSA by Financial Need (Kofoed, 2016)



Note: Dependent (blue) and Independent (red) student FAFSA completion rates by financial need compared to a theoretical, perfectly informed, student (green). A student is independent if they are over 24, has dependents, is married, is a graduate student, is a military veteran, is orphaned, was in foster care, a court in the student’s state of residents has declared the student an emancipated minor, or is homeless.

Figure 4 is contrasted by Kofoed’s data collected describing FAFSA completion trends from 2008. Figure 5 shows that a higher numbers of students exhibiting financial need complete the FAFSA than students who do not. In *FAFSA Completion and Financial Aid Gaps*, Kofoed states that “If all students have complete information about their eligibility for federal aid before they complete FAFSA, then the only variables that should influence FAFSA completion are the cost of attendance and the expected family contribution.” Students with a financial need (COA-EFC) less than or equal to zero dollars would not complete the FAFSA because they would not receive any federal aid. Students with financial need greater than zero would complete the FAFSA because they could receive some amount of federal aid.

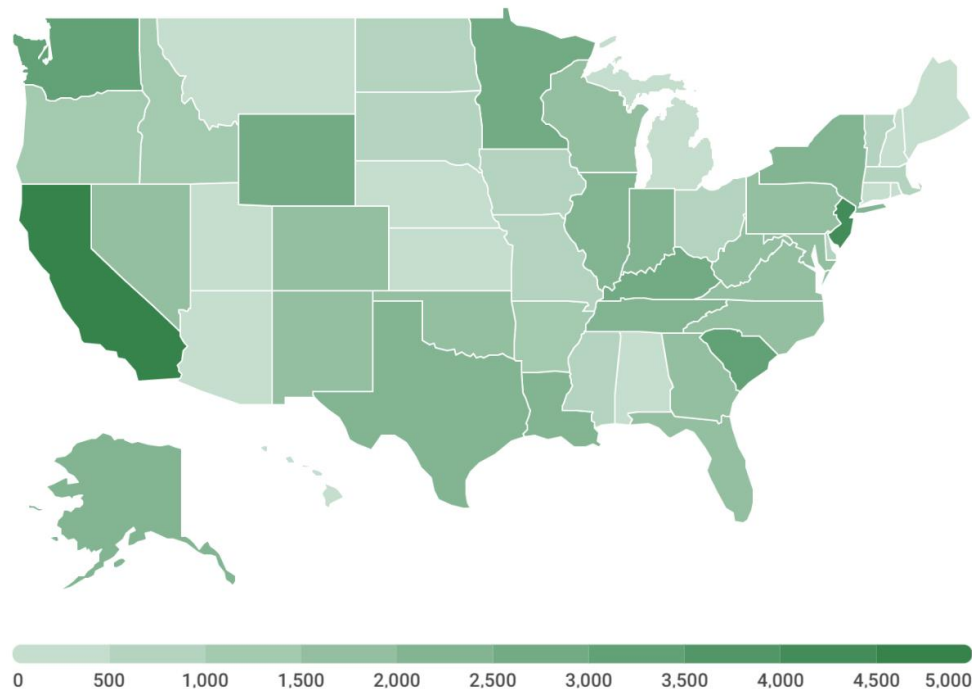
The perfectly informed student scenario described above is depicted by the dashed green line in Figure 5 and shows the immediate drop to zero FAFSA submissions once a student has a

financial need of zero dollars or lower. The blue line depicts the average student and indicates that students with greater financial need tend to complete the FAFSA at a higher rate than those with financial need lower than zero (Kofoed, 2016). The findings in Figure 5 of how students at different levels of financial need complete the FAFSA contradicts current trends in Figure 4. The shift from higher rates of submissions by students with financial need to students without financial need could shine light on to how policy changes and incentives have impacted who is completing the FAFSA. Kofoed's data in Figure 5 was collected between 1999 and 2008, before some state governments began to push for FAFSA completion by every high school senior. The shifting trends between Figure 5 and Figure 4 could show that government incentives and policies implemented since 2008 have encouraged higher income students to complete the FAFSA, resulting in the trends seen in Figure 4.

In 2018, lower income students in Tennessee completed the FAFSA at a greater rate than almost any other state. Tennessee's high completion rate results from numerous, unknown, reasons, including those previously discussed, but Reeves & Guyot suggest the high completion rates by low-income students is a result of Tennessee's HOPE (founded 2004) and Promise (founded 2015) scholarships. The HOPE and Promise scholarships are state and lottery funded scholarships and give additional aid to students who indicate financial need on their FAFSA. Although Tennessee's HOPE and Promise scholarships could be driving high completion rates,

the report “States That Provide Students with the Most Need-Based Scholarships & Grants” by Ted McCarthy (2020) indicates that every US state offers need-based scholarships and grants.

Figure 6: Average State Need-Based Scholarship and Grant Funding Per Student (McCarthy, 2020)



Note: States' average need-based funding per student is ranked in increments of \$500 from \$0 - \$5,000 with dark green indicating the largest amount.

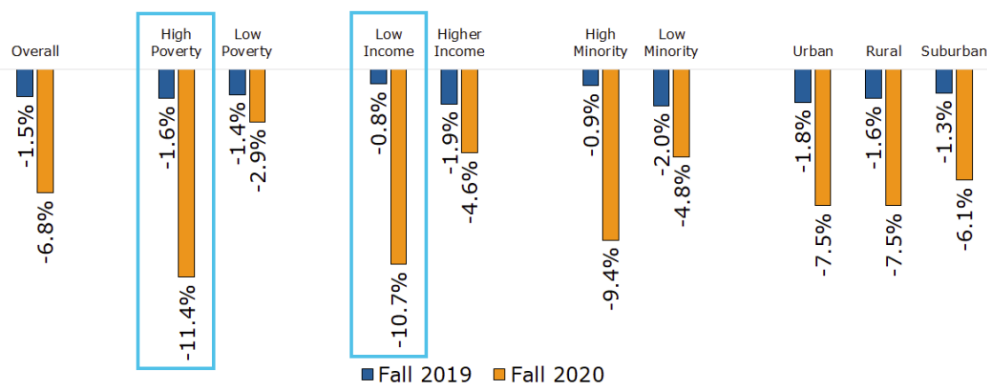
McCarthy's study (Figure 6) shows that Tennessee is the 9th largest in terms of average aid per student at \$2,400.22 and 13th in total grants provided at \$152,207,851. California ranks first by allotting \$5,178.83 of need-based funding per student and Montana ranks last providing \$44.78 per student. The average aid per student across all states is \$1,463.87 (McCarthy, 2020).

State financial aid programs might not be the sole reason for Tennessee's high completion rates in 2018. Eight states provide higher levels of need-based financial aid per student, but Tennessee consistently achieves a higher FAFSA completion rate. If FAFSA completion was directly correlated to need-based financial aid per student provided, Tennessee would not see their current levels of completion rates. Although need-based financial aid provided per student

provided and FAFSA completion rates may not have perfect correlation, Tennessee’s HOPE and Promise Scholarships seem to impact FAFSA completion rates.

Figure 7 shows changes in college enrollment for fall 2019 and fall 2020 from high/low poverty, high/low income, high/low minority, urban, rural, and suburban high schools. College enrollment saw a larger negative change in high poverty and low-income schools compared to changes in high income and low poverty schools according to the National College Attainment Network ([NCAN](#), and Bill DeBaun, 2021).

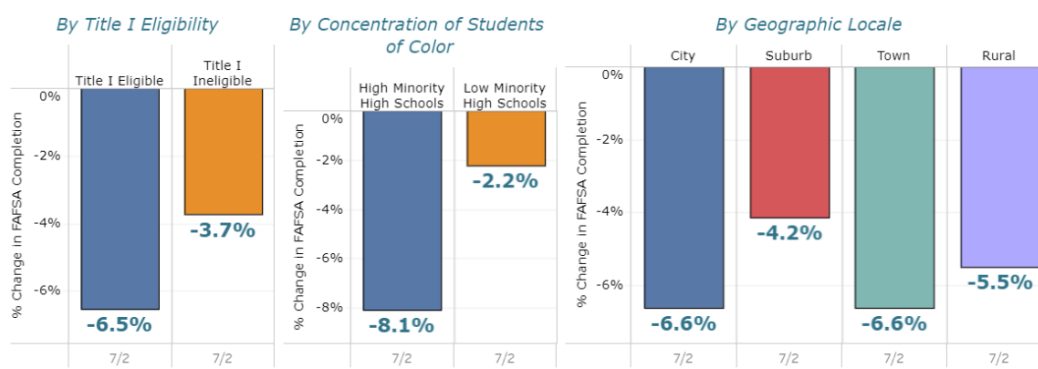
Figure 7: Percent Change in Immediate Fall Enrollments by High School Characteristics (DeBaun, 2021)



Note: Year-over-Year changes in FAFSA completion rates are recorded for the overall population, high poverty, low poverty, high income, low income, high minority, low minority, urban, rural, and suburban high schools. Rates are recorded for recorded fall 2019 and fall 2020.

High poverty, low income, and minority schools saw enrollment changes from fall 2019 to fall 2020 of 9.8%, 9.9%, and 8.5% respectively; Low poverty, high income, and low minority schools saw enrollment changes of 1.5%, 2.7%, and 2.8% respectively. The differences in enrollment changes between high/low poverty and high/low minority schools are 8.5% and 4.6% respectively. High schools with high poverty, low income, and high minority students have greater volatility in college enrollment (Figure 7), aligning with [NCAN](#)’s findings in Figure 8.

Figure 8: Change in FAFSA Completion by Selected Characteristics (Bill DeBaun, 2021)



Note: Year-over-Year changes in FAFSA completion rates are recorded for Title I/Non-Title I high schools, High Minority/Low Minority high schools, and high schools in cities, suburbs, towns, and rural areas.

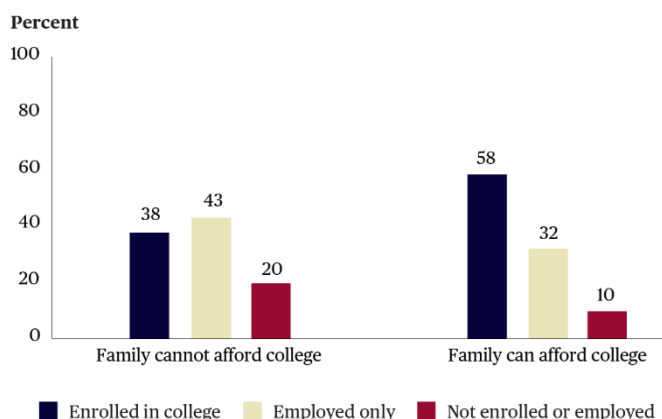
In Figure 8, [NCAN](#) finds that [Title I](#) and high minority schools had a larger decrease in FAFSA completions for the Fall 2020 than low minority and Non-[Title I](#) high schools. An elementary, middle, or high school is [Title I](#) eligible if 40% or more of the student body is from a low-income household (US Department of Education, 2018). [Title I](#) schools saw a 2.8% larger decrease in FAFSA completions than non-[Title I](#) schools (Bill DeBaun, 2021). Using [NCAN](#)'s Percent Change in Immediate Enrollment (figure 7), negative changes in college enrollment and FAFSA completion seem to align. The relationship between Figure 7 and Figure 8 could partially support the nation-wide decrease in FAFSA completions.

Impact of the Perception that College is Un-Affordable

The perception of college affordability has a marked impact on a student's pursuit of a college degree. A 2022 report by the Institute for Educational Sciences National Center for Education Statistics ([IES](#) [NCES](#)) shows that students who believe their family cannot afford college have a 20% lower college attendance rate than students who believe their family can afford college. Students were categorized as "afforders" and "non afforders" based on their agreement or disagreement with the following statement: "Even if you get accepted to college, your family cannot afford to send you" ([NCES](#) 2022-057). By grouping students based on their perception of

college affordability, as opposed to using financial data, takes into consideration the findings of Veles and Horn’s earlier study showing that approximately 57% of families over-estimate the cost of attendance of 4-year public college in their state by more than 25% (Veles, Horn, [NCES](#) 2019-404). Not only does the actual inability to afford college impact college attendance, but so does the perceived inability to afford.

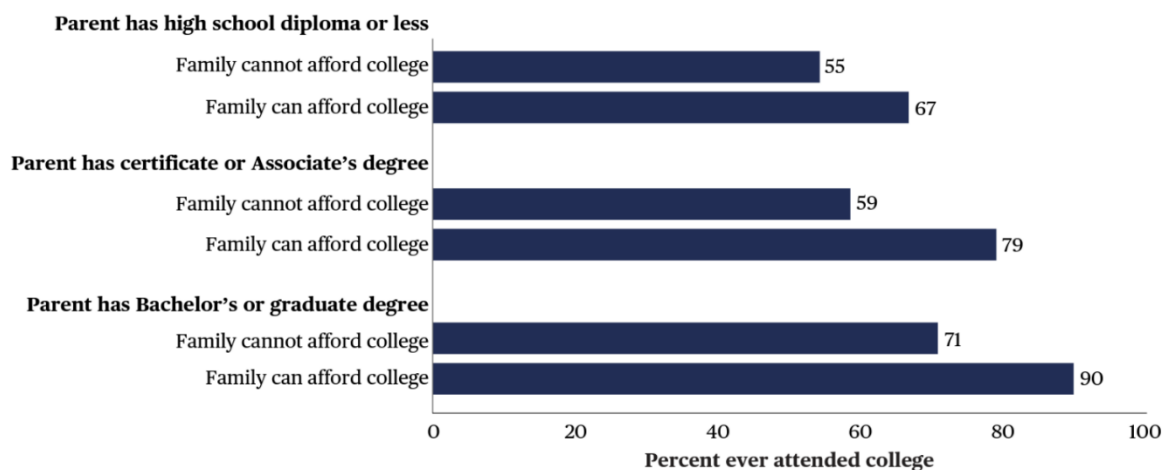
Figure 9: College Enrollment and Employment Rates for High School Class by Their Views of College Affordability (IES NCES, 2022-057)



Note: Students perception on college affordability and its impact on high school seniors’ decision to attend college. Students are classified as: enrolled in college, employed only, and not enrolled or employed.

[NCES](#) 2022-057 (Figure 9) shows that students who classify themselves as non-afforders have a 20% lower college attendance rate than students who classify themselves as afforders. Non-afforders are shown to become employed after high school graduation 11% more than afforders. Non-afforders are shown to be unemployed and unenrolled in college after high school graduation 10% more than afforders ([NCES](#) 2022-057) Three years after high school graduation, seen in Figure 10, students that consider themselves non-afforders and have parents with a high school diploma or less have a 55% college attendance rate. Non-afforders who have parents with a bachelor or graduate degree have a 71% college attendance rate ([NCES](#) 2022-057).

Figure 10: College Attendance Rates by 2016 for the High School Class of 2013, but Their Views of College Affordability and Highest Level of Parent Education in 2012 (IES NCES, 2022-057)



Note: The impact of parental education and student perception on college affordability of college attendance.

The impact of parental education and a student's perception of college affordability on college attendance are shown to correlate in Figure 10. Figure 10 shows that students' views of college affordability increase as parents' highest level of education increases. The observed correlation could be due to numerous factors. One factor could be that students with a parent who has attended college might better understand the cost of attending college than a student with parents who have not attended college. A student who believed college was unaffordable may believe that college affordability is within reach due to parental experience attending college.

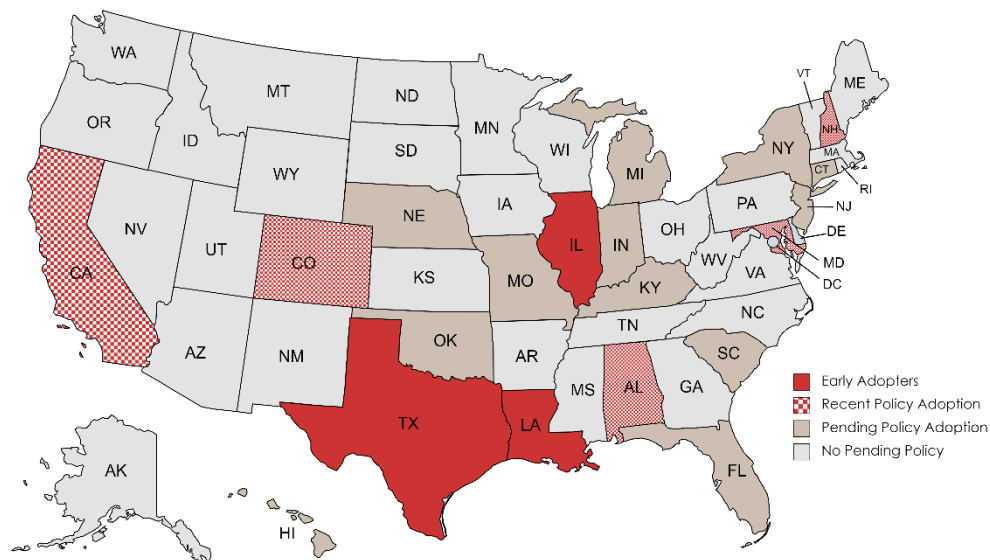
The Century Foundation (2022) describes how a student's perception of college affordability can be impacted by high school counselors. Researchers found that high school counselors in Louisiana, a state with mandatory FAFSA completion for highschoolers, provided more opportunities for students to ask questions about college affordability. Increased opportunities to ask questions and learn about the cost of attending college resulted in more college applications and higher attendance, even from students who did not receive any federal student aid (Granville, 2022). Submitting the FAFSA can also provide additional insight into the cost of

college attendance and solutions to affording it. Students who receive the PELL grant can apply for state aid programs, like Louisiana’s Go Grant, which provides college tuition assistance of up to \$3,000 per year in addition to PELL grant (University of Louisiana Office of Student Financial Aid, 2022).

State Initiatives to Increase FAFSA Completion

FAFSA completion is not typically required for college attendance, but state legislation in Louisiana, Illinois, Texas, Alabama, California, Colorado, Maryland, and New Hampshire encourages or requires FAFSA completion for high school seniors as noted in Figure 11. Connecticut, Florida, Indiana, Kentucky, Michigan, Missouri, Nebraska, New Jersey, New York, Oklahoma, and South Carolina have proposed, but not enacted, legislation involving mandatory FAFSA completion as of August 2022 (Granville, 2022, and Hughes, 2022). Arizona and Washington have implemented 24/7 “chat bots” that help high school students complete the

Figure 11: State Legislatures that have Proposed or Enacted Mandatory FAFSA Policies (Granville, 2022, and Hughes, 2022)

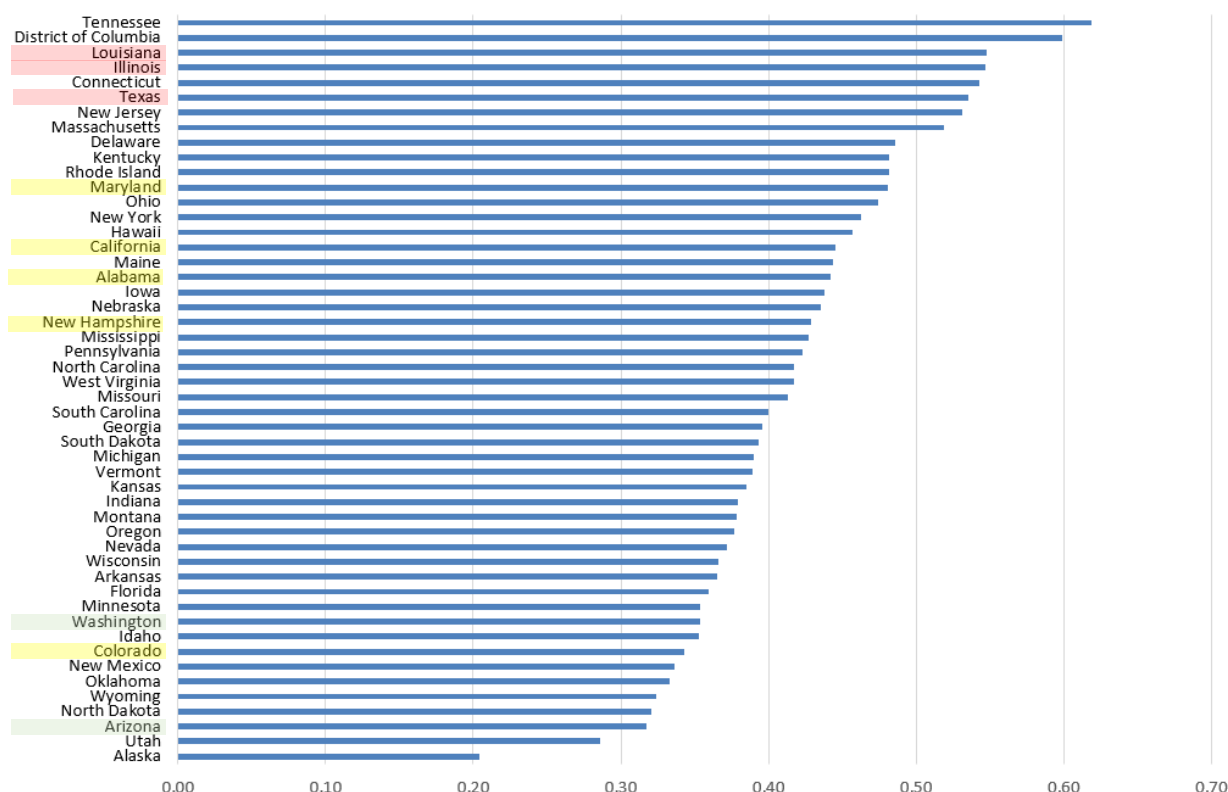


Note: Not all state policies explicitly require high school seniors to complete the FAFSA as a graduation requirement. Colorado and Maryland do not require students to complete the FAFSA at the state level. Colorado and Maryland incentivize schools or school districts to make FAFSA completion mandatory for high school seniors. States shaded brown have introduced legislation which has not passed as of August, 2022.

FAFSA. Multiple states in Figure 11 require high schools to have 100% of their students complete the FAFSA unless an exemption waiver is approved.

According to FAFSA National Tracker (Figure 12), as of March 3, 2023, the state with the highest FAFSA completion is Tennessee ranking 1st with 61.9% completion, Louisiana ranking 3rd with 54.8% completion, Illinois ranking 4th with 54.7% completion, Texas ranking 6th with 53.5% completion, Alabama ranking 18th with 44.2% completion, Washington ranking 42nd with 35.4% completion, and Arizona ranking 49th with 31.7% completion.

Figure 12: FAFSA Completion Rates Per State as of March 3, 2023 (National FAFSA Tracker, 2023)



Note: States highlighted red are “early adopter states” of mandatory FAFSA completion policy. States highlighted in yellow have enacted a form of mandatory FAFSA policy. States highlighted in green encourage the use chat-bots to increase high school senior FAFSA completion. The District of Columbia is included in this data set. **All state ranks references are out of 51.**

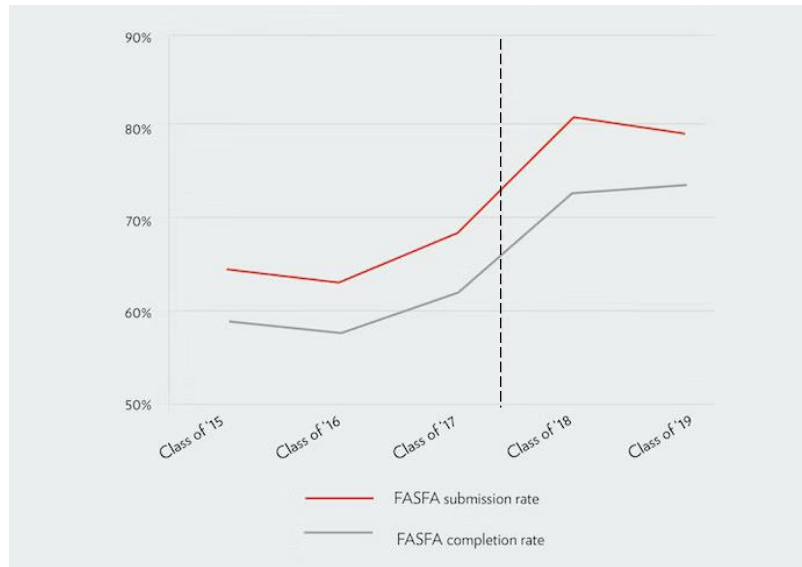
The three states highlighted in red were the first to adopt a mandatory FAFSA policy. Early adopter states have some of the highest FAFSA completion rates. States that have more recently introduced mandatory FAFSA legislation, highlighted in yellow, have widely varying completion

rates: Maryland ranks 12th, and Colorado ranks 44th. It is expected that states with mandatory FAFSA completion legislation will move closer to the top of Figure [12](#) as the 2023 [AY](#) approaches May. Applications in mandatory FAFSA completion states are expected to increase closer to May because of the skewing of application submissions towards spring/summer months seen in Figure [3](#). The skewing of FAFSA completions closer to spring/summer months is expected with a higher degree of confidence for the early adopter states. Early adopter states have had more time to discover and address inefficiencies in their systems. Addressing and resolving inefficiencies could result in more students completing the FAFSA because it is a requirement and not because the student is exhibiting college-going behavior (Figure [15](#)).

Louisiana (Early Adoption State)

Louisiana was the first state to pass legislation requiring high school students to submit the FAFSA as a graduation requirement. Louisiana has the most data available, yet the outcomes of the state's legislation are still unclear due to the long lead time for results to be seen. 2018 legislation requires high school students to submit either the FAFSA, the state financial aid application if ineligible for federal financial aid, or an opt-out waiver. Louisiana does not explicitly state schools' roles in helping students fill out the FAFSA.

Figure 13: Louisiana Public School Twelfth Graders' FAFSA Completion Rate Has Jumped up Since 2017 (Granville, 2022)



Note: FAFSA submission (red) and completion (solid grey) rates for the state of Louisiana tracked from the high school class of 2015-2019. Louisiana introduced Mandatory FAFSA completion policies in 2018 (vertical black dashed line).

Louisiana policy is clear that local educational agencies (LEA) are not responsible for collecting student FAFSA submission data or implementing/enforcing these policies. Policy will be enforced at a state level. Despite the lack of policy enforcement by schools and districts, Louisiana has seen increased FAFSA completion rates by high school seniors (Figure [13](#)).

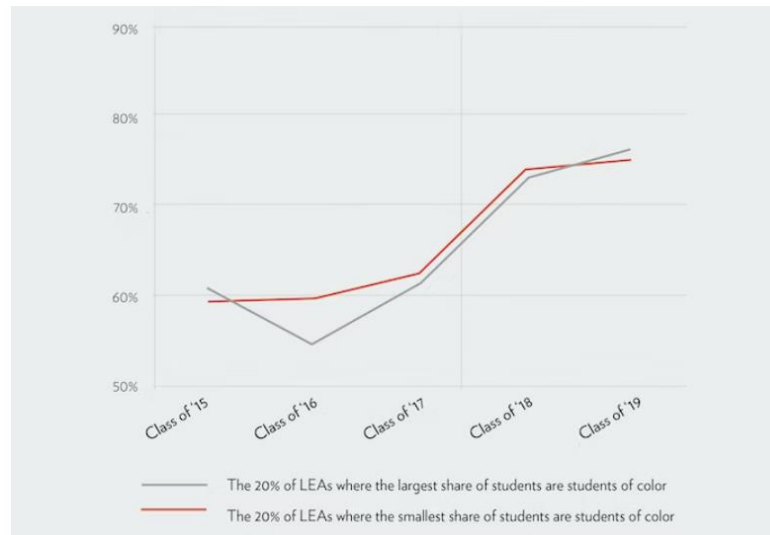
FAFSA completion rose 10.7% in the first year after policy enactment seen in Figure [13](#) (Granville, 2022). In addition to Figure [13](#), the Century Foundation (2022) states that before Mandatory FAFSA completion legislation was enacted in Louisiana, one out of three Louisiana public schools had a FAFSA completion rate greater than 65%. After Louisiana enacted the policy, four out of five schools had a FAFSA completion rate greater than 65%. In 2020, 2021, and 2022 Louisiana saw completion rates of 78.9%, 75.9%, and 74% (LDE, 2022, and LOSFA and LADE, 2021). National FAFSA completions have been negative since [AY](#) 2016-2017 (Figure [2](#)). Louisiana's ability to maintain relatively high completion rates, as college attendance and national

FAFSA completion rates waned nationally, shows that the state's approach to mandatory FAFSA completion could be effective.

Differences between the rates of students submitting the FAFSA and students completing the application (Figure [13](#)) highlight a point of improvement in the legislation. A FAFSA submission is defined as a student submitting their FAFSA partially complete. Completion is defined as the student filling out all required fields on the application. By not requiring completion, Louisiana high school students may only submit the application to fulfill the graduation requirement. Students could miss out on federal aid by not completing the application. Federal aid can only be awarded to applicants who submit completed applications.

Keeping the option to require submission, not completion, of the FAFSA is dependent on the requirements of the opt-out form. High school students must submit an opt-out waiver and state the "extenuating circumstances" that prevent them from completing the FAFSA. Requiring a detailed opt-out waiver could lead to issues for students who are unable to contact parents, or undocumented students and families according to The Century Foundation (Granville, 2022). Keeping the option to require submission only, gives students an opportunity to meet Louisiana's graduation requirements without having to disclose why they cannot complete the FAFSA.

Figure 14: FAFSA Completion Rates in LEAs with Many Students of Color Roughly Match Rates in the LEAs with Few Students of Color (Granville, 2022)

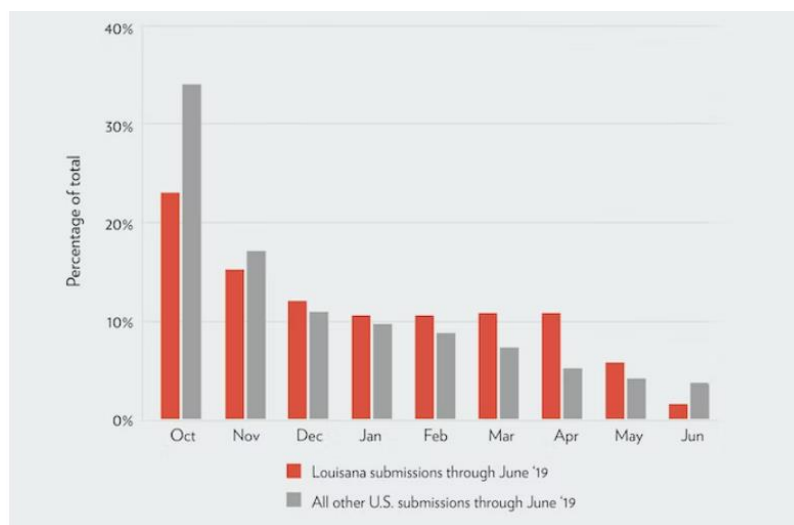


Note: Louisiana FAFSA completion rate comparison between Local Educational Agencies with high and low shares of students of color from 2015-2019.

Louisiana has also experienced an equitable increase in FAFSA completion rates between local education agencies ([LEAs](#)) with the highest 20% and lowest 20% of students of color shown in Figure 14. [LEAs](#) with the highest 20% of students of color saw greater completion rates in 2019 than low minority [LEAs](#) (Granville, 2022). Similar completion rates show that state legislation to increase FAFSA completion is being equitably implemented in most schools, giving all students the opportunity to benefit. The Century Foundation (2022) found that before the implementation of Louisiana’s legislation, [LEAs](#) in 2016 with many students of color completed 8.5% fewer FAFSAs than [LEAs](#) with few students of color (figure 14). In 2019, marginal differences in completion rates were noted.

Figure 15 from The Century Foundation (2022) shows the months when Louisiana students submitted FAFSAs compared to national student submissions in 2019. The figure reports a larger percentage of Louisiana high school students delay submission until closer to graduation. Delayed application submissions could decrease the impact Louisiana’s legislation has on students’ college-going behavior. Federal student aid is on a “first come, first serve” basis. Students applying in March, April, or May will not receive federal aid if there are no funds left, regardless of the student’s eligibility. Completing the FAFSA near graduation decreases a student’s opportunity to apply for colleges.

Figure 15: Louisiana Sees More FAFSA Submissions Close to High School Graduation, Relative to the Nation (Granville, 2022)



Note: Louisiana high school student FAFSA submissions versus the US average in 2019 broken down by month.

When comparing FAFSA completion rates from 2021 to 2022 in Figure 3, it shows that students are completing their FAFSAs later in the year than before. Louisiana began experiencing delayed FAFSA completions in 2019 (Figure 15). It is unclear if national trends of delayed FAFSA completion and Louisiana’s trends are caused by the same driving factor. The national trend may be attributed to online/remote education implementation by universities and decreased student interest in college attendance ([Delayed FAFSA Applications](#)). The most likely cause for Louisiana students’ delayed completion times is the new legislation. Granville (2022) does not note a shift

in Louisiana's completion rates towards the spring until after the state implemented mandatory FAFSA completion legislation.

A possible solution to encourage students to submit their FAFSAs earlier, leading to more financial aid awards for Louisiana students, could be minor changes to legislation requiring a student's FAFSA to be submitted earlier in the student's senior year. Earlier submission could potentially increase a student's interest or opportunity to attend college. However, earlier submission requirements could also increase the burden placed on schools and [LEAs](#). Another challenge posed by an earlier submission requirement would be determining and implementing consequences for students who fail to submit their FAFSA by the state required date. The complications associated with an earlier submission date may not outweigh the benefits students could receive.

Illinois (Early Adoption State)

The FAFSA completion requirements in Illinois differ from Louisiana. Illinois legislation outlines a "clear expectation of schools' roles in mandatory FAFSA implementation" (Granville, 2022). The Century Foundation reports that Illinois legislation also states that schools must help students and families in every way possible with good-faith before a student may be exempt for "extenuation circumstances." The additional requirements placed onto schools without additional financial support from state or local sources increase the burden on schools to provide more help without more funding. It appears that a greater workload without increased funding would negatively impact the state's results, but according to FAFSA National Tracker as of March 3, 2023, Illinois has one of the highest FAFSA completion rates. Illinois' completion rate is round 0.1% lower than Louisiana's, although Louisiana requires less from their schools. Illinois' FAFSA

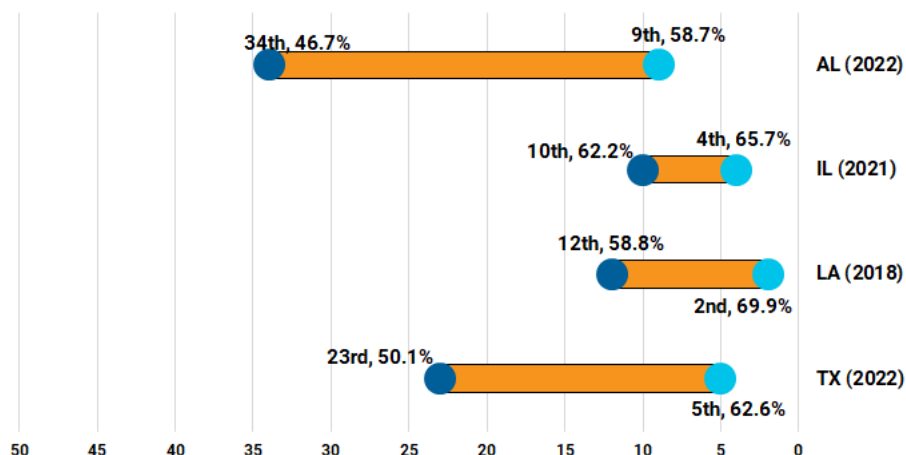
completion rate is 1.3% higher than Texas' completion rate, although Texas offers monetary benefits for increased completion rates.

State aid grant programs for PELL grant recipients may sway students to apply for the FAFSA at higher rates. A clear relationship between state aid programs and FAFSA completion rates when comparing Illinois, Texas, and Louisiana is not present. Illinois students who receive the PELL grant can apply for the state's Monetary Award Program (MAP) grant, which is a financial award that students do not have to repay. The maximum award for MAP is \$7,200 per year according to Illinois Student Assistance Commission (ISAC, 2022). Texas' TEXAS Grant awards \$10,758 per year (College for all Texans, 2022), and Louisiana's Go Grant awards \$3,000 per year (ULOSFA, 2021). If state aid programs had a substantial impact on FAFSA completion rates, a larger difference in completion rates should be recorded between Louisiana, Illinois, and Texas. Completion rates should reflect the dollar difference between what state programs offer students. To support current completion rates, the three states' grant programs should offer similar amounts of funding per student.

Texas has the highest dollar award per student as well as the highest award as a percentage of the average in-state tuition and fees for a 4-year public university (Reeves, 2022). The TEXAS Grant covers up to 124% of Texas' average tuition and fees. Illinois' MAP covers up to 50% of Illinois' average in-state tuition and fees, and Louisiana's Go Grant covers up to 32%. The large differences between the award amounts and their maximum percentage of tuition covered does not seem to correlate with the much smaller changes in FAFSA applications submitted by high school seniors. State aid programs focus on only serving PELL grant recipients could be driving the programs' marginal impact on FAFSA completions. Expanding state aid programs to impact all students who exhibit financial need ([COA](#) - [EFC](#)) could increase state wide student incentives to

complete the FAFSA. Many students exhibit financial need who do not qualify for the PELL grant as shown in Figure 1.

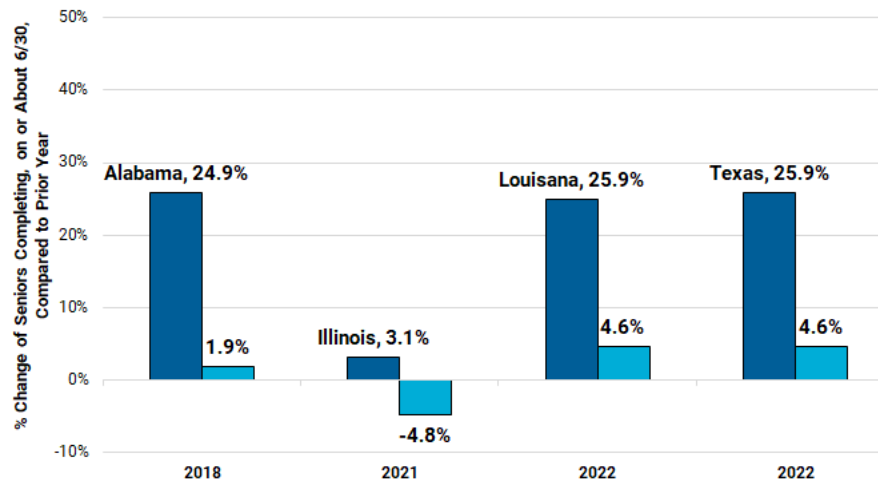
Figure 16: States' FAFSA Completion Rank and Percent of Seniors Completing a FAFSA in Year Before and Implementation Year of Universal FAFSA (DeBaun, 2022)



Note: Alabama, Illinois, Louisiana, and Texas have had Mandatory FAFSA policies implemented for the greatest amount of time compared to other Mandatory FAFSA states. Dark blue indicates each states FAFSA completion ranking the year before mandatory FAFSA completion legislation was enacted. Light blue indicates each states FAFSA completion ranking the first year after legislation was enacted.

Although Illinois' mandatory FAFSA completion policy has increased the states completion rates, Illinois only saw a 3.5% increase in completions by high school seniors in the first year after the policy was implemented. Illinois ranks lowest of the four states in Figure 16 by FAFSA completion growth in the first year of policy implementation. Louisiana experienced an 11.1% increase in FAFSA completions in their first year of policy enforcement, Texas experienced a 12.5% increase, and Alabama experienced a 12% increase (Figure 16). In Bill DeBaun's 2022 [NCAN](#) article, *Digging Deeper into Universal FAFSA Impacts in Four States*, he notes that Illinois had a year-over-year increase in FAFSA completions of 3.1% when the policy was implemented. The national year-over-year change in completion was -4.8%, and the 2020-2021 national FAFSA completion rate was below 50%. Illinois' completion rate remained at 65.7%, which kept them around 15 percentage points higher than the national average FAFSA completion rate.

Figure 17: Year-Over-Year Percent Change of FAFSA Completion in States Implementing Universal FAFSA Verses Nationally, During First Implementation year (DeBaun, 2022)



Notes: Dark blue indicates each state change in FAFSA completion rates the first year they were implemented. Light blue indicates the national FAFSA completion rate during the same year each state implemented their legislation. Illinois experienced negative growth in FAFSA completions the first year implemented their mandatory FAFSA policy.

Adjusting Illinois' first year growth to account for the negative national FAFSA completion rate in Figure 17, raises the states percent change over the national average to a 7.9%. With the adjustment, Illinois still trails behind the three other states. It is unclear why Illinois experienced a low increase. Bill DeBaun (2022) states that "Illinois was already a top 10 FAFSA completion state before implementing universal FAFSA, indicating the [original] policies, practices, and student behaviors were already contributing to good FAFSA completion outcomes. How much further [can] a high-performing state still rise with the universal FAFSA implementation." Contrasting DeBaun's theory that high-performing states can only increase FAFSA completion a limited amount, Louisiana was ranked 2 places lower than Illinois and rose to second, shadowing Illinois jump from 10th to 4th (figure 17).

Texas (Early Adoption State)

Texas has the fifth highest FAFSA submission rates and provides monetary incentives to schools for increased FAFSA submission rates, unlike Louisiana and Illinois. Texas also has a

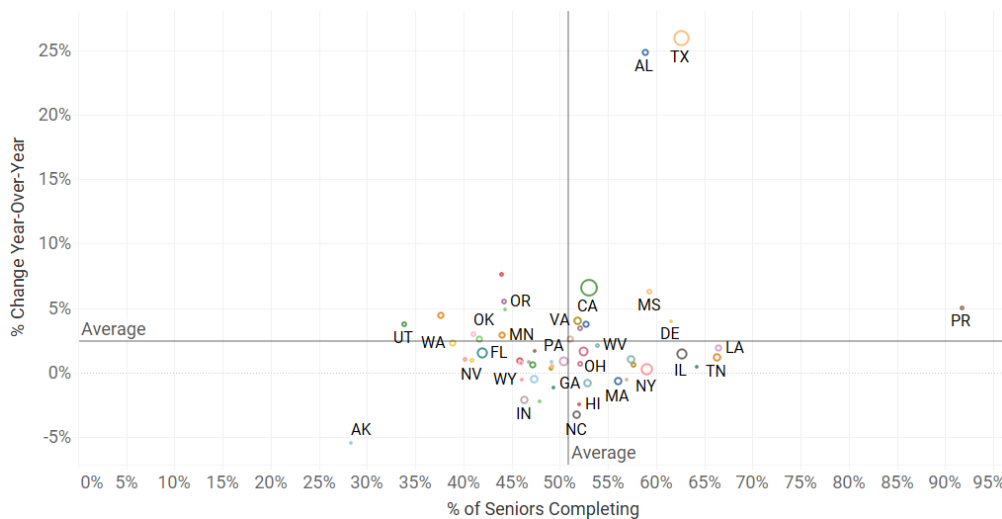
very simple opt-out process for students who do not wish to or cannot complete the FAFSA (Granville, 2022). Texas' monetary incentive system should be the most effective way to increase FAFSA completion by high school seniors. Louisiana and Illinois' current systems could create incentives for counselors/schools to encourage students to opt-out of completing the FAFSA. Schools might try to minimize the work done to help students complete the application because they are not receiving additional funding. Louisiana and Illinois could see slower increases in FAFSA completion if high schools begin to follow the incentive. Texas' financial reward to schools for each student that completes the FAFSA allows for schools with high FAFSA completion rates to be rewarded while still promoting increased student participation at schools with low completion rates.

Texas also provides more leniency for students not submitting the FAFSA. Texas legislation states that school counselors can waive a student's FAFSA completion requirement "for good cause, as determined by the school counselor" (Granville, 2022). Allowing for counselor discretion could benefit students in Illinois and Louisiana, who currently can only be excused due to documented extenuating circumstances. The Texas policy leaves an open opportunity for counselors to opt-out many students, but the financial incentives for schools to maximize completion should outweigh the incentive for counselors to reduce their workload. Financial incentives outweighing workload reduction incentives is supported by Chris Burt's article, "A State-By-State Look at FAFSA Filings and Two Huge Trend Boosts This Year." Burt (2022) reported that Texas experienced an increase of FAFSA completions by 49,000 students or a 26% from 2021 to 2022. The national reduction in applications during that time was around 250,000 applications. Texas' application growth accounted for 19.6% of total US FAFSA submissions (Burt, 2022).

Alabama

Alabama had the second largest increase in year-over-year FAFSA completions during the state's first year of mandatory FAFSA completion for high school seniors. During the first year that Alabama's Mandatory FAFSA completion policy was enacted (AY 2021-2022), the state experienced a 24.9% increase in completions as seen in Figure 17. Alabama also experienced a 28.1% increase in FAFSA completions in schools with 40% or more students reporting to be Black or Hispanic (DeBaun, 2022).

Figure 18: HS Class of 2022 FAFSA Completion Through 7/1, By State, Percent Change in FAFSA Completions by Percent of Seniors Competing (DeBaun, 2022)



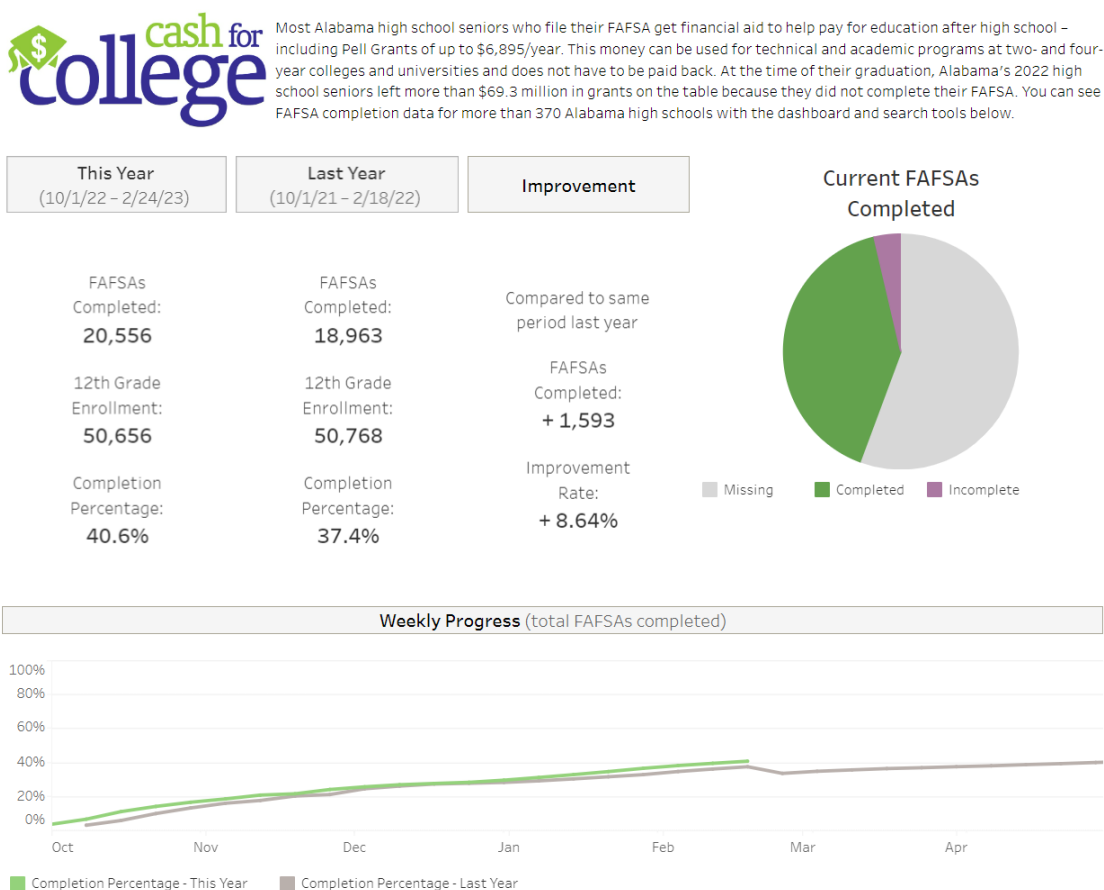
Notes: Circle size is weighted, indicating each states' proportion of total FAFSAs completed nationally. Outliers include Alabama, Texas, Alaska, and Puerto Rico.

Figure 18 shows a large increase of FAFSA completions in both Texas and Alabama on the y-axis, due to their FAFSA policy introductions. The figure also shows that Texas and Alabama are leading the chart by completion rate with Illinois, Tennessee, and Louisiana on the x-axis (DeBaun, 2022).

Alabama's opt-out form is similar to Louisiana and Illinois', requiring the signature of a "parent, legal custodian, legal guardian, or a minor legally emancipated or of the legal age of majority" (Portia, et al., 2022). The state places FAFSA completion enforcement and reporting on

to schools. To assist school reporting efforts and help standardize the reporting process, Alabama created the FAFSA completion portal and set aside \$500,000 to fund the FAFSA completion dashboard. The FAFSA completion portal is managed by the Alabama Commission on Higher Education, ACHE (McCartney, 2022). The portal can be accessed by public schools once their district signs confidentiality and use agreement forms (ACHE, 2022). Access to the portal notifies high schools when FAFSAs are submitted as incomplete or have errors. Schools can better target issues with submissions by knowing which students are incorrectly submitting the FAFSA (McCartney, 2022). Students who make an error in the FAFSA completion process are given the opportunity to receive one-on-one assistance. During one-on-one conversations, counselors dive into why students are not completing their application or how to fix errors throughout it. Alabama's FAFSA completion portal's goals to target students in need of assistance and to standardize the reporting process, sets Alabama's FAFSA completion efforts apart from Texas, Illinois, and Louisiana's. The completion portal reduces high schools' workload by knowing which students need assistance.

Figure 19: Year over Year FAFSA Completion by Number of Applications from 2021-2022 (Alabama Possible, 2023)



Note: FAFSA completion rates from the 2021-2022 AY and 2022-2023 AY are compared. FAFSA completion rate is tracked as a percentage of total high school senior enrollment.

Alabama has access to relatively reliable data that they can easily compile into their dashboard and track progress. Figure 19 is a simple, publicly available tool that helps schools and districts see how policies are impacting FAFSA completion by high school seniors. The dashboard by Alabama Possible, a statewide nonprofit organization with a goal to break down barriers to prosperity through advocacy, education, and collaboration, shows growth of 8.6% in FAFSA completions by high school seniors in [AY](#) 2022-2023 when compared to the previous academic year.

New Hampshire

New Hampshire will be implementing a mandatory FAFSA completion policy for the 2023-2024 AY. The state aligned the policy start date with release of a shortened, less complex,

version of FAFSA (Kahn, 2021). New Hampshire plans to launch a pilot program in public schools to test the efficacy of mandatory FAFSA completion. Legislation does not describe the extent of the pilot program. Kahn (2021) reports that the state's goal is to grow the pipeline of workers and increasing long term economic growth in New Hampshire through the mandatory FAFSA completion policy. New Hampshire does not clearly define the full plan to release the program, but emphasizes the focus on adaptability by recording how schools and students react to the policy and the policy's impacts on college attendance. The state claims that, in addition to requiring high school seniors to complete the FAFSA, schools will teach financial literacy. Basic financial knowledge could help students see FAFSA as an opportunity to better understand the cost of attending college and solutions to increase affordability. (Kahn, 2021).

New Hampshire's policy proposal signed into place states that "Each school district with a high school shall provide to each high school student and, if applicable, his or her parent or guardian, any support or assistance necessary to comply." The policy also states that "A school district shall award a high school diploma to a student who is unable to meet the requirements if the student has met all other graduation requirements and... the school district has made a good faith effort to assist the student" (NH Education Committee, 2021). High school seniors will be offered the option to complete the FAFSA or submit a waiver. Policy clearly shows that students who do not complete the FAFSA but successfully complete all other graduation requirements will be given the third option to receive a diploma, even if they did not submit an opt-out-waiver. Kahn (2021) mentioned that the state does not intent to deny students of a diploma they earned, but wants to encourage students to complete the FAFSA as a requirement. New Hampshire will be the first state to test how effective a mandatory FAFSA completion policy is when there are no negative consequences for students who do not complete the FAFSA or submit an opt-out waiver.

Colorado

Colorado's mandatory FAFSA completion policy is vastly different from other states in funding procurement, implementation, and timeline. Instead of making FAFSA completion a graduation requirement, the state plans to offer temporary financial incentives to high schools through the Student Aid Applications Completion Grant Program (grant program). The legislation passed by the Colorado General Assembly (2021) intends for schools to build stronger communication channels with families and students about the importance of FAFSA, using the state funding received. Higher education institutions are also given financial incentives by Colorado. Colleges can draft student aid plans detailing how the state funding received will be used to assist students and specific subsets of their population which were impacted greatest by Covid-19 (Colorado General Assembly, 2021). Colleges' student aid plans are submitted for review to the Colorado General Assembly for review before funding is allocated. Colorado's goal is to minimize the impact of Covid-19 on certain students and will only be in effect until July 1, 2026 according to legislation. FAFSA completion as a main priority is mentioned sparingly in the legislation and declaration for the bill. The policy's overarching push is to provide "an equitable economic recovery from the pandemic [by] having robust pathways for workers to obtain new skills, earn higher wages, and be prepared for the in-demand careers of the future" (Colorado General Assembly, 2021).

The Colorado Opportunity Scholarship Initiative (COSI) will fund the state's FAFSA completion policy with money received from the federal Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program authorized by the American Rescue Plan Act of 2021, which provides \$350 billion to state, territorial, and local governments to support their responses to COVID-19 (US Department of Treasury, 2022). The Colorado General Assembly states that they

plan to set aside \$49,000,000 for institutions to implement student aid plans (Colorado General Assembly, 2021).

Colorado is encouraging “students who have some postsecondary credits but stopped attending [college] before obtaining a credential, and first-time students who were admitted to an institution for the 2019-20 or 2020-21 academic year but did not enroll for the 2020-21 academic year,” to complete the FAFSA (Colorado General Assembly, 2021). Students that fit into the described qualifications, must complete the FAFSA to receive state aid from the Colorado Re-Engaged (CORE) initiative. CORE’s is an associate completion program that helps eligible students receive a baccalaureate degree at a four-year institution by paying for an associates degree. The state is apportioning \$1,000,000 for CORE.

High schools and school districts can receive financial incentives to increase FAFSA completion rates from the [grant program](#). The fund for FAFSA completion incentives has been allocated \$1,500,000 by the state, which is significantly less than the \$49,000,000 allocated to colleges for submitting student aid plans. For schools/districts to receive funding from the grant program, they must require that FAFSA completion is mandatory for seniors, unless a waiver is submitted. Schools/districts receiving funding from the grant program must submit annual reports detailing how the grant money is used. The annual reports will be reviewed by the Colorado Opportunity Scholarship Initiative and the Colorado Educational Committees of the General Assembly (Colorado General Assembly, 2021).

Colorado’s approach to increase FAFSA completion rates will likely not have a large-scale impact. The state is very strict on which students can access funding and allocated very little funding to incentivize schools/districts to require FAFSA completion. I do not think that Colorado will see largescale increases in their completion rates. The state’s policy was implemented for the

2021-2022 AY. Colorado is currently ranked in the bottom 10 states by FAFSA completion for the 2022-2023 [AY](#) (Figure [12](#)). The 2022-2023 [AY](#) is the second school year that Colorado's policy has been in place. All of the early adoption states saw notable increases in senior FAFSA completion rates in the first year of policy enactment (Figure [16](#)). Colorado experiences completion rates of 33.5% in 2016. As of 2022, the state's completion rate has increased to 42.2%, but the national average completion rate was about 54% in the 2020-2021 [AY](#) (Chad, 2016, and Gonzales, 2022). Colorado's consistent underperformance before and after the new policy was implemented can show that monetary incentives alone might not be enough to encourage state wide increases in FAFSA completion by high school seniors. Illinois and Louisiana's large increases in completion rates without financial incentives to schools, also supports that financial incentives alone will not significantly increase FAFSA completion rates.

California

The California Student Aid Commission (CSAC) and the state of California have put enacted a mandatory FAFSA completion policy like Louisiana's. The state will not set strict requirements on how schools should assist students and will not provide financial incentives. California plans to standardize their reporting system by developing and providing direction to Local Educational Agencies (LEA) on how and where to submit their data (CSBA, 2022). Alabama's large increases in FAFSA completion have shown the impact of reporting system standardization.

[LEAs](#), instead of individual high schools, must report and confirm FAFSA completion. By shifting reporting responsibilities to [LEAs](#), more time and resources could be dedicated to recording accurate and standardized data. Good data will help the state properly track each high school's performance. Tracking the policy's impact on a per-school basis can help the state target

specific areas that are low income or high minority. Low income and high minority schools are shown to have lower, more volatile, FAFSA completion rates (Figure [8](#)).

California has also increased the amount of funding allocated to state, income based student aid programs to encourage FAFSA completion and college attendance. The state's \$18.3 billion general fund for higher education assistance will receive a \$2.7 billion increase in the 2022-2023 State Higher Education Budget. Within the State Higher Education Budget, the Cal Grant is receiving an increase of \$235.1 million dollars. (LAO, 2022). The Cal Grant targets students showing exceptional need. Exceptional need is defined as a household with an income under \$60,000. In addition to the Cal Grant, California funds a "Middle-Class" Scholarship program for households that earn less than \$200,000 annually (Kirasic, 2022). The Middle-Class Scholarship Program is receiving a \$522 million increase in the 2022-2023 State Higher Education Budget. California's expansion of financial aid opportunities should bolster FAFSA completion numbers as seen in Tennessee (Figure [6](#)). California is currently in the top 15 states by completion rates for the 2023-2024 application cycle (Figure [12](#)) and is 19% ahead of where they were this time for the previous application (National FAFSA Tracker, 2023). It will take longer to see the impact of California's policies and increased funding, but the state's current FAFSA completions seen in Figure [12](#) show significant early improvement.

Maryland

Maryland intends to work with County Boards of Education (CBE) to increase FAFSA completion rates, rather than making FAFSA completion a graduation requirement for high school seniors. Maryland's plan emphasizes educating students and letting CBEs design a system to encourage FAFSA completion that will work best for their district. Maryland's current completion

rate is 6% higher year-over-year, and the state ranks twelfth in FAFSA completions (Figure [12](#)). Maryland has a current completion rate of 51.9% (National FAFSA Tacker, 2023).

The policy enacted by the Maryland General Assembly (MGA), SB0664, states that CBEs should encourage high schools to help students complete the FAFSA or the Maryland State Financial Aid Application (MSFAA). Maryland's legislation notes that students should complete the FAFSA or the MSFAA by the MSFAA's spring deadline. The state also requires each CBE to develop an outreach plan detailing how they will increase FAFSA completion in their schools. CBEs are not explicitly directed on how to increase FAFSA completion rates, but one requirement set by Maryland is that at least three evening or weekend financial nights must be held at each high school (MGA, 2021). The financial aid nights must "provide information and assistance to students and their parents or guardians in completing the FAFSA or MSFAA" (MGA, 2021). CBEs must submit their student outreach plan before October first each academic year to the Maryland Higher Education Commission (MHEC). Before July first of each academic year, CBEs must report student submission data of the following: students who completed the previous year's FAFSA by the deadline for state financial aid eligibility, students who completed the FAFSA after the MSFAA deadline, and students who did not complete the FAFSA (MGA, 2021). Previous iterations of the state's policy required that students complete the FAFSA as a graduation requirement, but for unknown reasons, all sections containing the requirement were removed.

I believe that providing financial education opportunities for students while not making FAFSA completion mandatory will marginally impact FAFSA completion rates. [Colorado](#), [Arizona](#), and [Washington](#)'s low FAFSA completion rates support the marginal effect of optional FAFSA completion assistance paired with no state requirement for seniors to complete the application. If Maryland created a financial incentive for high schools to increase FAFSA

completions like [Texas](#), [California](#) and [Tennessee](#), Maryland could see a larger increase in completion rates.

Arizona and Washington (Alternative Approach)

Arizona and Washington both use online “chatbots” that nudge students to complete the FAFSA through text. Nudges, remind students of important financial aid deadlines and can answer questions about how to complete the FAFSA. Washington’s OtterBot is a simple chatbot exclusively for students who have signed up for the College Bound Scholarship, according to the Washington Student Achievement Council (WSAC, 2023). The College Bound Scholarship (CBS) is a need-based, early college commitment program targeting students who received free/reduced lunches in the seventh, eighth, or ninth grade. Students can enroll into the early commitment program, which pays for the average tuition at over 65 public colleges in Washington along with fees and a book allowance. Students enrolled in CBS have access to OtterBot, giving them 4-12 nudges a month on “need-to-know financial aid and college planning information, resources, suggestions, and deadlines” (WSAC, 2023).

Arizona’s more robust program, Benji, is available to all Arizona high school students and schools for free. Benji nudges students about financial aid and college planning information, while also answering detailed FAFSA questions quickly and securely. Benji was created by Arizona State University (ASU) students and community partners through Project Benjamin. Project Benjamin is a \$1 million grantee of the Schmidt Futures’ Alliance for the American Dream competition designed to reduce inequality and relieve poverty in the United States (Belec, 2020). Education Forward Arizona (2022) claims that Benji’s text-based outreach has increased non-FAFSA completing students’ college enrollment by 20% (Richardson, 2023). Belec (2020) claims

that Mesa Public Schools have experienced a 10% increase in FAFSA completions from 2018 to 2020 due to the use of Benji (Belec, 2020).

Since Benji's release in October 2019, it has helped Arizona school districts better train and provide in person FAFSA assistance according to "ASU helps answer high schoolers' top FAFSA questions" (Belec, 2020). Belec reports that Ben Fisher, a Mesa Public Schools college and career coach, attributes his school district's 10% jump in FAFSA completions by high school seniors to Benji. The district successfully trained 27 peer coaches, approximately four per high school, to help students who want in-person FAFSA assistance. Benji is used to help peer coaches answer specific student questions and quickly obtain answers to problems the coaches do not know how to address (Belec, 2020). Despite Arizona and Washington's efforts, Figure [12](#) shows that Washington ranks 42nd in FAFSA completion with a 35.4% completion rate, and Arizona ranks 49th with 31.7% completion.

FAFSA Completion Initiative Impacts - Opinion

The long-term impact of mandatory FAFSA completion legislation is not fully understood. Each early adoption state has experienced an increase in FAFSA completions (Figure [16](#)). Mandatory FAFSA completion policies have not increased FAFSA completion to one hundred percent, but the impact of each state's policy on FAFSA completion rates should be used to test what methods yield the highest increases. The state with the highest FAFSA completion rate, [Tennessee](#), does not enforce FAFSA completion as a high school graduation requirement. Tennessee and other states are creating alternate incentives for students to complete the FAFSA at rates similar to or higher than mandatory FAFSA completion states. Mandatory FAFSA completion states' lower rates could be caused by the long roll-out periods for legislation or the high utilization of opt-out waivers by students. It is unclear how many students are choosing to

opt-out of the FAFSA, but a large opt-out rate could partially account for states' difficulty breaking into the 80% completion rate range.

Tennessee remains an anomaly by consistently producing the highest FAFSA completion rates, without making FAFSA completion mandatory. State financial aid for students could be causing Tennessee's high completion rates, but California's middle-class scholarship that helps families earning up to \$200,000 should create a similar impact as Tennessee's HOPE and Promise scholarships (Figure 6). A study of Tennessee's marketing campaigns to increase awareness about the HOPE and Promise scholarships, and the state's legislative leadership should be conducted to determine what factors are driving high completion rates. Studying Tennessee could provide other states with additional programs to increase their FAFSA completion rate.

Maryland and Colorado have enacted policies that indirectly impact students and do not require FAFSA completion for high school graduation. It is unclear what the outcome of Maryland and Colorado's policies will be. Colorado's temporary, Covid-19 driven approach will show the impact of a highly targeted FAFSA completion policy. Maryland's free-form, education driven approach could demonstrate the efficacy of educating students on the the FAFSA. By giving each County Board of Education (CBE) the opportunity to create a student outreach plan, Maryland could quickly test what method are most effective at increasing FAFSA completion rates. By allowing CBEs to create their own plan without additional funding, Maryland incentivizes CBEs to make bare minimum attempts to abide by state guidelines. Poor data caused by CBEs' potential reluctance to comply could produce inconclusive results.

New Hampshire policy requires students complete the FAFSA to graduate, but removed the penalty for not meeting the requirement. I do not believe that students will follow the state's suggestion to complete the FAFSA when there is no negative incentive if the FAFSA is not

completed. New Hampshire's emphasize the education of financial literacy could effectively increase FAFSA completion rates, but I do not think the approach will produce rate improvements as strong as Louisiana and Texas. New Hampshire's policy provided a vague plan that focused on adaptability. Like Maryland, New Hampshire's policy could result in inconclusive data that will not give the state with a clear path towards their FAFSA completion and economic goals.

A similar program to Arizona's Benji Chat-Bot could be implement in every state to assist busy high school counselors. It seems unlikely that students will ask a chatbot to answer complex FAFSA questions over a counselor or career coach. Students' preference for person-to-person assistance is supported by Arizona and Washington's extremely low completion rates (Figure [12](#)). The city of Mesa shows how a chatbot system can train and assist personnel who work with students. Mesa's 10% increase in FAFSA completion rates out paces Arizona's. If Mesa's career coach approach is applied across the state, Arizona could see large increases in FAFSA completion.

From the research in this report, it seems clear that states should implement the following: financial incentives to reward schools for increased FAFSA completion rates, clear and standardized reporting guidelines for schools/districts, tools for schools/districts to benchmark FAFSA completion rates, and increase state funded student aid scholarships. My recommendations are based on prevailing methods used in states experiencing the highest increases in FAFSA completion rates. States implementing one or more the above recommendations seem produce FAFSA completion rates that continue to outperform most other states (Figure [12](#)). By implementing all four approaches, larger strides towards near one hundred percent FAFSA completion could be possible.

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