

# Supporting Students Affected by Recent FAFSA Revisions

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# Executive Summary

The Free Application for Federal Student Aid (FAFSA) was recently changed significantly, both in form and content. The new application had particularly negative effects on students from mixed-status households, for whom the new website largely did not work.

In response in California, the California Student Aid Commission (CSAC) took the emergency action of widely opening use of the California Dream Act Application (CADAA), which is normally restricted to use by undocumented students. Documented students utilizing the CADAA miss out on all federal supports– Pell grants; work-study; Direct Subsidized and Unsubsidized Loans; PLUS Loans. They retain only their qualification for the Cal Grant program. The estimated difference in funding for a low-income freshman in this position is \$17,535 + PLUS loan amounts.

Many students will be negatively affected by this in the 2024-2025 school year in various ways (e.g., dropouts, financial hardship, disruption of academic progress).

## Summary of Recommendations

Entities at all levels of power in California can help students who have been negatively affected by the *Better FAFSA* disruptions and delays.

**Institutional Interventions:** College Financial Aid and Admissions offices should organize to identify students who have been affected and work to counteract the harm that has been done, by way of a variety of proactive supportive measures.

**Legislation:** The following bills are already proceeding through the legislative process and should be supported:

- Assemblymember Mike Fong's 2024 AB 2500 bill streamlining how financial aid application extensions are granted and simplifying the CA Student Aid Commission's procedures to approve extension requests, while giving institutions increased time to submit requests
- Assemblymember Eloise Gómez Reyes' 2024 AB 2165 bill increasing transparency and accountability by ensuring that high school counselors communicate with their students and students' parents when students are opted out from the requirement to complete and submit financial aid applications and by requiring that data be provided to school districts regarding opt-out forms

**Prevention by Outreach:** Outreach efforts should be supported and increased to alert students and families to the financial impact of utilizing the CADAA rather than FAFSA in cases in which it is unnecessary. Outreach should additionally focus on the importance and logistics of students' switching back to utilizing the FAFSA as soon as possible.

# Background

## FAFSA and the FAFSA Simplification Act

The Free Application for Federal Student Aid, or FAFSA, is the primary means by which most U.S. students access public financial support for post-secondary educational endeavors. It was initially developed as part of the Higher Education Act of 1965,<sup>1</sup> but was significantly adjusted in the Higher Education Amendments of 1992.<sup>2</sup> By 2023, the FAFSA had grown to be more than 100 questions long and was drawing significant criticism “for being too complicated to navigate,”<sup>3</sup> according to the Congressional Research Service. Many people were calling for a simplification of the application, including former Senator Lamar Alexander of Tennessee, who touted that “Reducing the FAFSA from 108 questions to 36 will remove the biggest barrier to helping more low-income students pursue higher education.”<sup>4</sup>

On December 27th, 2020, the *FAFSA Simplification Act* was passed as a rider on the omnibus Coronavirus funding legislation known as the “Consolidated Appropriations Act, 2021.”<sup>5</sup> It was part seven out of 21 in Division FF of the legislation. An excerpt of the related section of the table of contents of the bill is shown below, in Figure 1. “As originally enacted, the [FAFSA Simplification Act] had a general effective date of July 1, 2023,”<sup>6</sup> meaning that the legislation passed on December 27th, 2020 mandated that the U.S. Department of Education carry out the FAFSA simplification process within two and a half years of the legislation passing. However, “[i]n March 2022, the FAFSA Simplification Act Technical Corrections Act (FSATCA) was enacted” which “pushed the general effective date for the [FAFSA Simplification Act] back one year, to July 1, 2024.”<sup>7</sup>

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<sup>1</sup> “Higher Education Act of 1965,” Pub. L. No. 89–329 (n.d.), <https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>.

<sup>2</sup> Claiborne [D-RI Sen. Pell, “Higher Education Amendments of 1992,” S.1150 § (1992), <https://www.congress.gov/bills/102nd-congress/senate-bill/1150>.

<sup>3</sup> “The FAFSA Simplification Act” (Congressional Research Service, August 4, 2022), <https://crsreports.congress.gov/product/pdf/R/R46909>.

<sup>4</sup> Michael Stratford, “Congress Clinches Deal to Restore Pell Grants for Prisoners 26 Years after Ban,” Politico, December 20, 2020, <https://www.politico.com/news/2020/12/20/congress-pell-grant-prisoners-449364>.

<sup>5</sup> “Consolidated Appropriations Act, 2021,” Pub. L. No. 116–260 (n.d.), <https://www.congress.gov/116/plaws/publ260/PLAW-116publ260.pdf>.

<sup>6</sup> “The FAFSA Simplification Act.”

<sup>7</sup> Ibid.

DIVISION FF—OTHER MATTER	
Title I—Continuing Education at Affected Foreign Institutions and Modification of Certain Protections for Taxpayer Return Information	
Title II—Public Lands	
Title III—Foreign Relations and Department of State Provisions	
Title IV—Senate Sergeant at Arms Cloud Services	
Title V—Repeal of Requirement to Sell Certain Federal Property in Plum Island, New York	
Title VI—Preventing Online Sales of E-Cigarettes to Children	
Title VII—FAFSA Simplification	
Title VIII—Access to Death Information Furnished to or Maintained by the Social Security Administration	
Title IX—Telecommunications and Consumer Protection	
Title X—Bankruptcy Relief	
Title XI—Western Water and Indian Affairs	
Title XII—Horseracing Integrity and Safety	
Title XIII—Community Development Block Grants	
Title XIV—COVID-19 Consumer Protection Act	
Title XV—American COMPETE Act	
Title XVI—Recording of Obligations	
Title XVII—Sudan Claims Resolution	
Title XVIII—Theodore Roosevelt Presidential Library Conveyance Act of 2020	
Title XIX—United States-Mexico Economic Partnership Act	
Title XX—Consumer Product Safety Commission Port Surveillance	
Title XXI—COVID-19 Regulatory Relief and Work From Home Safety Act	

**Figure 1. Excerpted Section of the Table of Contents of the Omnibus Legislation that Included the FAFSA Simplification Act**

## Documentation Terminology

There are many important distinctions to be aware of when discussing matters involving documentation status. The term “documentation status” itself is the phrase most commonly employed when discussing matters that exist at the intersection of public policy and citizenship or immigration. As shown below in Table 1, “documented” and “undocumented” are umbrella terms that encompass a variety of circumstances regarding immigration status in the United States.

**Table 1. Examples of “Documented” vs. “Undocumented” Immigration**

Examples of “Documented” Immigrants <sup>8</sup>	Examples of “Undocumented” Immigrants <sup>9</sup>
<ul style="list-style-type: none"> <li>• Naturalized citizens of the U.S.</li> <li>• Green card holders / Permanent Residents</li> <li>• Those with currently valid visas</li> <li>• People admitted formally as refugees</li> <li>• People granted asylum</li> <li>• Those designated as having Temporary Protected Status</li> </ul>	<ul style="list-style-type: none"> <li>• Those who entered the U.S. without being legally processed at a border crossing, a.k.a. “Entered Without Inspection (EWI)”</li> <li>• Those who entered the country legally but have remained (“overstayed”) past the legal limit of their visit</li> <li>• DACA (Deferred Action for Childhood Arrivals) individuals</li> <li>• U.S. citizen spouse petitioners, Asylum petitioners, those whose U-visa applications are currently pending, and others who are attempting to proceed legally but have not yet completed the process</li> <li>• Individuals whose legal status in the United States is</li> </ul>

<sup>8</sup> Jeffrey S. Passel and Jens Manuel Krogstad, “What We Know about Unauthorized Immigrants Living in the U.S.,” Pew Research Center, July 22, 2024, <https://www.pewresearch.org/short-reads/2024/07/22/what-we-know-about-unauthorized-immigrants-living-in-the-us/>.

<sup>9</sup> “Defining Undocumented,” Immigrants Rising, n.d., <https://immigrantsrising.org/resource/defining-undocumented/>.

Examples of “Documented” Immigrants <sup>8</sup>	Examples of “Undocumented” Immigrants <sup>9</sup>
(TPS) <sup>10</sup>	uncertain due to political changes or inefficiencies in bureaucracy, such as those whose cases are affected by hot-button political rhetoric and/or active disagreements between branches of government

According to Pew Research Center, “As of 2021, the nation’s 10.5 million unauthorized immigrants represented about 3% of the total U.S. population and 22% of the foreign-born population.”<sup>11</sup> Of all U.S. states, California hosts the largest population of unauthorized immigrants— 1.9 million people. This population represents 18% of the total U.S. population of undocumented immigrants, and 4.7% of California’s overall population.

## Mixed-Status Households

A mixed-status household is a family unit where at least one member is undocumented and at least one member has legal immigration status, such as a green card or citizenship. **In the context of discussions regarding financial aid applications, this term is commonly employed to refer to households in which the student’s documentation status is adequate to qualify them for federal financial aid, but one or more of their parents or guardians is undocumented.**

Mixed-status households are distinct from households in which everyone is undocumented. In matters involving the U.S. Department of Education, documented students with undocumented parents are categorized alongside all other documented students and qualify for all the same benefits and supports. Undocumented students are categorized separately, and cannot legally benefit (even indirectly) from any federally-funded support programs. While the Department of Education does not explicitly discriminate based on students’ parents’ citizen statuses, it also does not prioritize accommodation of those students in their administrative systems.

A 2024 FWD.us report estimated that 11% (4.28 million) of all people in California live in a mixed-status household.<sup>12</sup> When referring specifically to children, estimates climb to 12% (1.02 million children).

## Deferred Action for Childhood Arrivals (DACA)

When discussing DACA, it is important to first establish the concept of a “Dreamer.”

A Dreamer is an undocumented immigrant who came to the United States as a child. Deferred Action for Childhood Arrivals (DACA) is a deferred action policy implemented by the Obama administration in June 2012 that is aimed at protecting Dreamers. DACA is not [a] lawful status nor does it provide the opportunity for Dreamers to stay permanently – it temporarily shields Dreamers from deportation and provides them work authorization with possible renewal every two years. There are as many as 3.6 million Dreamers residing in the United States, but only about 530,000 Dreamers are currently protected

<sup>10</sup> “Temporary Protected Status,” U.S. Citizenship and Immigration Services, July 22, 2024, <https://www.uscis.gov/humanitarian/temporary-protected-status>.

<sup>11</sup> Passel and Krogstad, “What We Know about Unauthorized Immigrants Living in the U.S.”

<sup>12</sup> “Immigration Reform Keeps Millions of Mixed-Status Families Together,” FWD.us, January 18, 2024, <https://www.fwd.us/news/mixed-status-families-1/>.

under DACA. The average DACA recipient arrived in the United States at age 7 and has lived here for more than 20 years.<sup>13</sup>

Individuals who qualify and are designated as DACA are recognized to have a unique immigration status. Importantly, the parameters and limitations of their status are particularly unstable, as the program was established by executive order rather than by legislation and can be revoked or significantly altered by each successive Presidential administration.

Current (June 2024) qualifying criteria according to U.S. Citizenship and Immigration Services for DACA applicants are as follows:

A request for DACA may be granted only if USCIS determines in its sole discretion that you meet each of the following threshold criteria and merit a favorable exercise of discretion:

1. Were under the age of 31 as of June 15, 2012 (that is, you were born on or after June 16, 1981);
2. Came to the United States before reaching your 16th birthday;
3. Have continuously resided in the United States since June 15, 2007, up to the time of filing your request for DACA;
4. Were physically present in the United States on June 15, 2012, and at the time of filing your request for DACA with USCIS;
5. Had no lawful immigration status on June 15, 2012, and at the time of filing your request for DACA, meaning that:
  - You never had a lawful immigration status on or before June 15, 2012, or
  - Any lawful immigration status or parole that you obtained had expired as of June 15, 2012, and
  - Any lawful status that you had after June 15, 2012, expired or otherwise terminated before you submitted your request for DACA;
6. Are currently enrolled in school, have graduated or obtained a certificate of completion from high school, have obtained a General Education Development (GED) certificate, or are an honorably discharged veteran of the United States Coast Guard or armed forces of the United States; and
7. Have not been convicted of a felony, significant misdemeanor (that is, a misdemeanor as described in 8 CFR 236.22(b)(6)), or 3 or more other misdemeanors, and do not otherwise pose a threat to national security or public safety.<sup>14</sup>

As of March 2020, DACA had helped approximately 900,000 immigrants stay in the U.S., go to school, and contribute to the economy through employment.<sup>15</sup> The DACA program can protect individuals from deportation, but it does not provide a pathway for U.S. citizenship. Further, it provides **no pathway or mechanism by which a DACA student might apply for federal financial assistance for education** via the FAFSA (nor seek many other federal supports, such as federally-funded healthcare coverage).

However, DACA recipients who have a social security number can fill out the FAFSA application to seek out other forms of student financial aid, such as private scholarships.<sup>16</sup> Doing so allows DACA recipients to access the FAFSA Submission Summary, which outlines their individual

<sup>13</sup> "Dreamer Advocacy Resources," National Immigration Forum, September 20, 2023, <https://immigrationforum.org/article/dreamer-advocacy-resources/>.

<sup>14</sup> "Consideration of Deferred Action for Childhood Arrivals (DACA)," U.S. Citizenship and Immigration Services, n.d., <https://www.uscis.gov/DACA>.

<sup>15</sup> "Key Facts on Deferred Action for Childhood Arrivals (DACA)," KFF, April 13, 2023, <https://www.kff.org/racial-equity-and-health-policy/fact-sheet/key-facts-on-deferred-action-for-childhood-arrivals-daca/>.

<sup>16</sup> "Eligibility for Non-U.S. Citizens," Federal Student Aid, n.d., <https://studentaid.gov/understand-aid/eligibility/requirements/non-us-citizens>.

need for financial aid. According to the FAFSA website, the Submission Summary, formerly known as the Student Aid Report, is a useful resource for students to access institutional aid as well as other scholarships by helping them demonstrate need.<sup>17</sup> The FAFSA Submission Summary is a report usually required by universities and those providing scholarships, and therefore is important for those seeking aid for university.<sup>18</sup>

As of December 31, 2022 there were approximately 580,000 active DACA program participants in the U.S., 28% of whom (approximately 162,400 people) resided in California.<sup>19</sup> Enrollment rates are necessarily shrinking as people age out of eligibility for the program and new applications are held up in high-level U.S. judicial and political entanglements. The DACA-eligible population who are enrolled in post-secondary educational institutions is a subset of those dwindling numbers: “The number of students with DACA or who are DACA-eligible [has declined], from 182,000 in 2019 to 141,000 in 2021, making up only one-third of undocumented students and 0.7% of all college students.”<sup>20</sup>

## Impacts of FAFSA Changes on Mixed-Status Households

### Contributor Profiles

One of the largest changes in how applicants interact with the *Better FAFSA* as compared to previous versions is that each involved party now has their own “contributor profile.” The student and each parent or guardian has their own private login credentials, set of questions to answer and repository for documentation of financial information. However, setting up individual contributor profiles involves verifying one’s identity, and that can be complicated for people without social security numbers. As Jake Brymner of CSAC puts it, “Parents without Social Security numbers now have to confirm their identities to complete the FAFSA, which may include uploading identifying documents.”<sup>21,22</sup>

The primary method of identity verification for all contributors is a set of “identity verification questions.” If the Federal Student Aid department doesn’t have enough information about a contributor to generate verification questions, or if the contributor answers the questions incorrectly, they will be pushed into a “manual verification process.” This is a multistep process that involves completing and signing an attestation form and scanning and submitting copies of identifying documents.

### Technical Issues

Following the December 30, 2023 launch of the *Better FAFSA*,<sup>23</sup> mixed-status families encountered many technical problems that hindered their ability to complete their financial aid

<sup>17</sup> “What You Need To Know About the FAFSA Submission Summary,” Federal Student Aid, accessed July 22, 2024, <https://studentaid.gov/articles/fafsa-submission-summary/>.

<sup>18</sup> Ibid.

<sup>19</sup> “Key Facts on Deferred Action for Childhood Arrivals (DACA).”

<sup>20</sup> “Undocumented College Students: How Many Students Are in U.S. Colleges and Universities, and Who Are They?,” American Immigration Council, July 20, 2023, <https://www.americanimmigrationcouncil.org/research/undocumented-college-students-2023>.

<sup>21</sup> Mikhail Zinshteyn, “California Extends Student Financial Aid Deadline,” CalMatters, March 26, 2024, sec. Higher Education, <http://calmatters.org/education/higher-education/2024/03/financial-aid/>.

<sup>22</sup> “How Do I Verify My Identity If I Create an Account and Don’t Have a Social Security Number?,” Federal Student Aid, accessed July 22, 2024, <https://studentaid.gov/help-center/answers/article/verify-identity-create-account-dont-have-ssn>.

<sup>23</sup> “U.S. Department of Education Announces More Than 3.1 Million FAFSA Forms Successfully Submitted and an Update to Student Aid Index Calculation | U.S. Department of Education,” n.d., <https://www.ed.gov/news/press-releases/us-department-education-announces-more-31-million-fafsa-forms-successfully-submitted-and-update-student-aid-index-calculation>.



applications. In previous years, students from mixed-status families had been able to print out paper applications and physically fill out their parents' financial information, writing in zeros for the social security numbers (SSNs) of undocumented parties; upon completing the paper form, they were able to sign and mail it to the Department of Education<sup>24</sup>. Though it has been reported that this option will be built into the *Better FAFSA*,<sup>25</sup> accounts have varied widely about whether it ever reached a state of consistent availability in the course of the application's first season.

The screenshot shows the Federal Student Aid website interface. At the top, there is a navigation bar with the Federal Student Aid logo and links for FAFSA® Form, Loans and Grants, Loan Repayment, and Loan Forgiveness. A bell icon is on the right. Below the navigation bar, a large red error message box is displayed. It contains an exclamation mark icon, the text "Unable to Complete This Action", and a message: "Thanks for your patience. Currently, the system is unable to complete this action. Please exit the FAFSA form and try again." A red button labeled "Exit FAFSA Form" is to the right of the message. Below the error message, the section "Parent Spouse's or Partner's Information" is visible, with instructions to enter information about the spouse and a note about matching FSA ID information. A placeholder for a parent or partner's profile picture is shown below the text.

**Figure 2. FAFSA Page with Error Message** A screenshot of a web page with an error message reading "Unable to Complete This Action. Thanks for your patience. Currently, the system is unable to complete this action. Please exit the FAFSA form and try again." (Source: Reddit Post "This Error Message Has Been Popping up Whenever My Parent Tries to Fill out Their Information on the Last Part of the FAFSA Form.")

[https://www.reddit.com/r/FAFSA/comments/18wz3gq/this\\_error\\_message\\_has\\_been\\_popping\\_up\\_whenever/](https://www.reddit.com/r/FAFSA/comments/18wz3gq/this_error_message_has_been_popping_up_whenever/).)

Many applicants were long prevented from filing a 2024-2025 FAFSA due to technical errors in the new FAFSA website. In April 2024, the National College Attainment Network released a report about the effects of FAFSA updates: "Through March 29, FAFSA completions for the class of 2024 are down 40% year-over-year, and just 27% of seniors have completed a FAFSA."<sup>26</sup> One notable fault was that attempting to leave the social security number section of an application blank (as the form directed) resulted in an error message that blocked people from proceeding. One example FAFSA error message is shown above, in Figure 2. While the Department of Education declared the issue to be resolved on March 12th, 2024,<sup>27</sup> the 2.5-month delay caused some mixed-status students to miss out on deadlines associated with scholarship applications and college financial aid packages that require FAFSA completion.

<sup>24</sup> "How Should We Report Information about My Noncitizen Parents on My 2023–24 FAFSA® Form? | Federal Student Aid," <https://studentaid.gov/help-center/answers/article/how-to-report-info-about-noncitizen-parents-on-fafsa>.

<sup>25</sup> "Better FAFSA for Mixed Status Families: Top 10 Things to Know So You Can Prepare." California Student Aid Commission, n.d. [https://www.csac.ca.gov/sites/main/files/file-attachments/better\\_fafsa\\_for\\_mixed\\_status\\_families.pdf?1696470229](https://www.csac.ca.gov/sites/main/files/file-attachments/better_fafsa_for_mixed_status_families.pdf?1696470229).

<sup>26</sup> DeBaun, Bill. "New Data: FAFSA Completions Down 40% Through End of March." National College Attainment Network, April 8, 2024. <https://www.ncan.org/news/669477/New-Data-FAFSA-Completions-Down-40-Through-End-of-March.htm>.

<sup>27</sup> "Update on Technical Fix to the 2024-25 FAFSA Form for Individuals Without a Social Security Number (SSN)," Federal Student Aid, March 12, 2024, <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-03-12/update-technical-fix-2024-25-fafsa-form-individuals-without-social-security-number-ssn>.

These delays drew such criticism that Congress was moved to action. As the American Council on Education reported on July 15, 2024:

In response to the Department of Education’s disastrous rollout of the new FAFSA earlier this year, the House Education and the Workforce Committee voted in an overwhelmingly bipartisan manner Wednesday to move forward with the FAFSA Deadline Act. . . The bill would require that the FAFSA be made available each year by Oct. 1, moving the deadline mandated by the Higher Education Act up from Jan. 1. . . During debate on the bill, Ranking Member Bobby Scott (D-VA) pointed out that while he hopes the form will be ready on time, a strict deadline might increase the chances of mistakes.<sup>28</sup>

Further challenges persist in the new system. For example, some students inviting a contributor without a SSN to complete their portion of the FAFSA continued to encounter error messages that prevented them from moving forward for the entirety of the first season of the application. Additionally, at least one problem from the previous FAFSA system has persisted into the new—maximum character capacity for surname fields. Both versions of the website have had a 16-character limit, which is particularly problematic for people from cultures wherein people commonly have long, hyphenated surnames that exceed 16 characters.<sup>29</sup>

## Privacy Considerations

One reason students from mixed-status households might choose to avoid applying for student aid via the FAFSA is fear over whether evidence of documentation status might be shared from the Department of Education to U.S. Immigration and Customs Enforcement (ICE). However, the Family Educational Rights and Privacy Act (FERPA) “protects the privacy of student records by requiring prior written consent before disclosing personally identifiable information to a third party.”<sup>30</sup> Regardless of whether privacy breaches truly occur, this risk is a looming fear in the minds of many and may significantly affect decisions regarding financial aid applications.

## The California Dream Act and California Student Aid Commission

The California Dream Act<sup>31</sup> is a state-based financial aid program that is available to a broader population, as it has less restrictive citizenship qualifications than federal financial aid programs. More specifically, “[t]he California Dream Act Application (CADAA) allows undocumented students who meet certain criteria to apply for financial aid.”<sup>32</sup>

The California Student Aid Commission (CSAC) is the group that “administers the Cal Grant program, a California-specific financial aid award that helps pay for college tuition and fees.”<sup>33</sup> Prior to recent FAFSA revisions, CSAC officially advised financial aid applicants to apply either via the FAFSA or the CADAA, but not both. The guidance they provided as of September 2023 about which application was appropriate for which applicants is depicted in Table 2 (below).<sup>34</sup>

<sup>28</sup> “House Committee Passes Bipartisan Bill to Move FAFSA Deadline to October 1,” American Council on Education, July 15, 2024, <https://www.acenet.edu/News-Room/Pages/FAFSA-Deadline-Act-Moves-Forward.aspx>.

<sup>29</sup> Adolfo Guzman-Lopez, “For Mixed-Status Families Struggling With Financial Aid Forms, Advisors Urge Patience,” LAist, April 3, 2024, <https://laist.com/news/education/latino-students-last-names-federal-financial-aid-fafsa>.

<sup>30</sup> “FERPA and Financial Aid,” FinAid, June 3, 2020, <https://finaid.org/educators/ferpa/>.

<sup>31</sup> “CA Dream Act Overview,” Immigrants Rising, n.d., <https://immigrantsrising.org/resource/ca-dream-act-overview/>.

<sup>32</sup> “California Dream Act Application FAQ” (California Student Aid Commission, n.d.), [https://www.csac.ca.gov/sites/main/files/file-attachments/all\\_in\\_cadaa\\_faq.pdf](https://www.csac.ca.gov/sites/main/files/file-attachments/all_in_cadaa_faq.pdf).

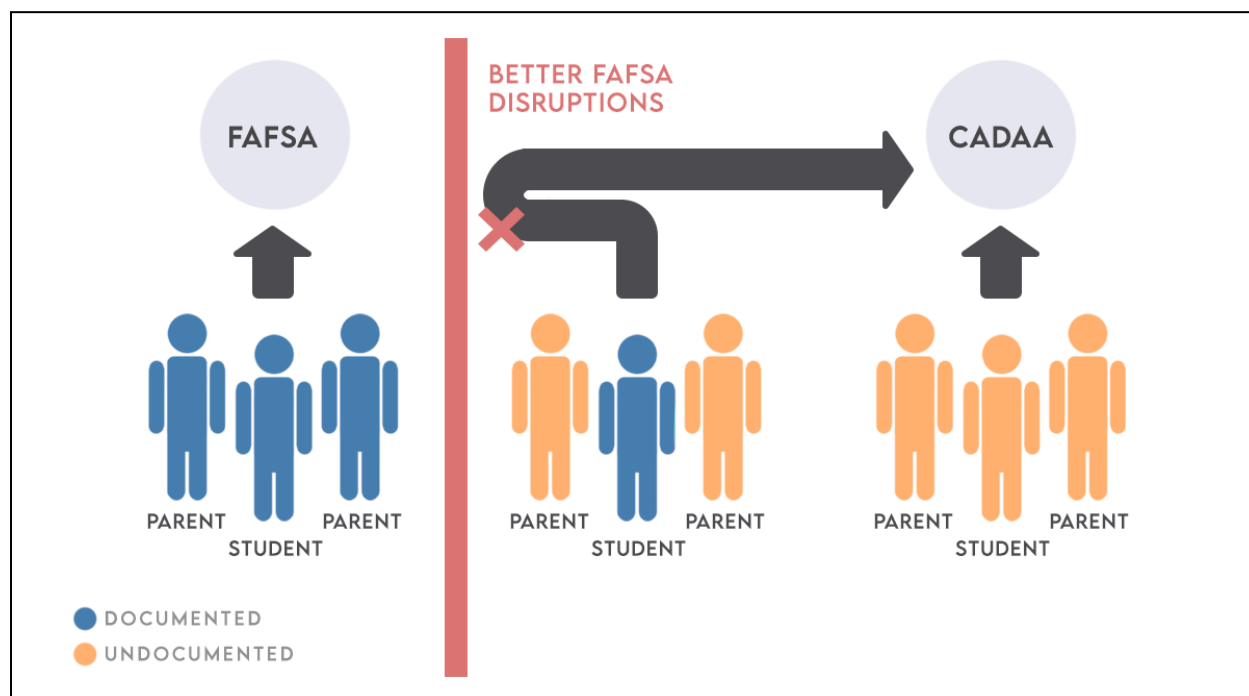
<sup>33</sup> “Cal Grants,” CSU, n.d., <https://www.calstate.edu/443/attend/paying-for-college/financial-aid/types/Pages/cal-grants.aspx>.

<sup>34</sup> “California Dream Act FAQ’s for Students and Parents,” September 2023, [https://www.csac.ca.gov/sites/main/files/file-attachments/california\\_dream\\_act\\_faq.pdf?1694549553](https://www.csac.ca.gov/sites/main/files/file-attachments/california_dream_act_faq.pdf?1694549553).

Table 2. CSAC's 2023 Guidance Pertaining to Which Financial Aid Application to Complete

Complete the FAFSA if you are a:	Complete the CADAA if you:
<ul style="list-style-type: none"> <li>• U.S. Citizen</li> <li>• Permanent Resident</li> <li>• Eligible non-citizen</li> <li>• T Visa holder</li> </ul>	<ul style="list-style-type: none"> <li>• Are undocumented</li> <li>• Have a valid or expired DACA</li> <li>• Are a U Visa holder</li> <li>• Have Temporary Protected Status (TPS)</li> </ul>

When large numbers of applicants from mixed-status households were unable to complete financial aid applications in the wake of FAFSA changes, however, CSAC had to pivot swiftly. On April 30th, 2024, they made the CADAA “available for all FAFSA-eligible students who are experiencing difficulties completing the FAFSA due to having a non-SSN contributor.”<sup>35</sup> CSAC has further advised students that while they should apply for aid via the CADAA now, in this time when it’s their only option, they should also persist in trying to apply via the FAFSA: “These students should also plan to complete FAFSA later to apply for additional financial aid including Pell Grant, work-study, and federal student loans.” For the 2024-2025 school year and likely beyond, the CADAA is the only path forward for many Californians who would previously have qualified for federal financial aid. A depiction of example households and their application pathways is shown below, in Figure 3.



**Figure 3. A Depiction of Family Stereotypes and Financial Aid Application Pathways**

<sup>35</sup> “#BetterFAFSA State Policy & Advocacy Toolkit” (Northern California College Promise Coalition, July 11, 2024), <https://docs.google.com/document/d/1qDVIImCVB34gs7d1qO29-8fwB8Oyu-s7xLdohcku-opg/>.

## Measuring the Difference

An accounting of the material differences in support available to undocumented vs. documented students is very helpful in understanding the full implications of the *Better FAFSA* disruptions and delays. In past years, CADAA was restricted to undocumented applicants, FAFSA was restricted to documented applicants, and there was no overlap or crossing over. For the hypothetical case of a low-income, dependent high school student applying to become a freshman at a 4-year college in California, the following table (Table 3) represents a breakdown of what financial aid would be available to them, differentiated by difference in documentation status:

Table 3. A Comparison of Aid Amounts Between Applicants of Differing Documentation Status

	Undocumented Student (via CADAA)	Documented Student (via FAFSA)	Difference
Maximum grant \$, nonspecialized	<u>Cal Grant Program amounts</u>	The maximum Federal Pell Grant award was <b>\$7,395</b> for the 2023–24 award year (July 1, 2023, to June 30, 2024). <sup>36</sup> + <u>Cal Grant Program amounts</u>	<b>\$7,395</b>
Money for work or service (estimate)	California Dream Act Service Incentive Grant Program is a maximum of <b>\$4,500</b> per year. <sup>37</sup>	Federal Work-Study (FWS) Program <sup>38</sup> estimate = federal minimum wage (\$7.25) * 20 hours per week * 32 weeks in a school year = <b>\$4,640</b>	<b>\$140</b>
Loans (subsidized + unsubsidized)	Dream Loan Program <b>\$4,000</b> per year, maximum <sup>39</sup>	Dependent freshman = <b>\$5,500</b> , maximum <sup>40</sup>	<b>\$1,500</b>
Total Difference in Available Student Aid			<b>\$9,035</b>

## Grants

Undocumented and documented students are both equally eligible for California's Cal Grant Program; this is financial aid that does not require repayment. Award amounts vary based on

<sup>36</sup> "Federal Pell Grants," Federal Student Aid, n.d., <https://studentaid.gov/understand-aid/types/grants/pell>.

<sup>37</sup> "California Dream Act Service Incentive Grant Program," California Student Aid Commission, February 1, 2018, <https://www.csac.ca.gov/california-dream-act-service-incentive-grant-program>.

<sup>38</sup> "Work-Study Jobs," Federal Student Aid, n.d., <https://studentaid.gov/understand-aid/types/work-study>.

<sup>39</sup> "California DREAM Loan Program," UC Admissions, n.d., <https://admission.universityofcalifornia.edu/tuition-financial-aid/types-of-aid/dream-loan-program.html>.

<sup>40</sup> "Subsidized and Unsubsidized Loans," Federal Student Aid, n.d., <https://studentaid.gov/understand-aid/types/loans/subsidized-unsubsidized>.

where a student enrolls, what they study, and whether they were ever involved in the foster care system.<sup>41</sup> Documented students who apply via FAFSA are additionally eligible for the Federal Pell Grant. While this amount is adjusted yearly, the maximum Pell Grant award for the 2023-2024 school year was \$7,395.<sup>42</sup>

## Money for Work or Service

Because undocumented students cannot legally work in the United States, alternative opportunities have been developed for them to serve their communities while receiving professional development skills and some amount of support for academic expenses. In California, that takes the form of the California Dream Act Service Incentive Grant Program, colloquially referred to as “DSIG.” While DSIG and the Federal Work-Study (FWS) Program are far from being direct analogs, they can both be considered to be forms of financial aid that are dependent on students spending their time in service to others. The amount of financial aid each program offers to students is roughly comparable, as shown in the previous table.

## Loans (Subsidized and Unsubsidized)

Student loans are the deciding factor in making a post-secondary education possible for many students. Students are able to fund their educations while pursuing them, and don’t have to begin repaying the loans until at least six months after exiting their academic program. In the case of subsidized loans, students don’t pay interest on their loans until repayment begins. Until that time, the Department of Education “subsidizes” the loans by making all interest payments on them.<sup>43</sup> In the contrasting case of unsubsidized loans, students are ultimately responsible for all interest that accrues. Interest begins to accrue immediately after the loan is initiated, but repayment on the interest is only required to begin on the same schedule as the general loan repayment.

The interest rate for Federal Direct Subsidized Loans and Direct Unsubsidized Loans to undergraduate students for the 2023-2024 school year was 6.53%.<sup>44</sup> The interest rate at the time of disbursement is fixed for the life of the loan, which powerfully limits students’ risk. Interest rates of Dream Loans “will always be set to the same interest rate as the Federal Direct Subsidized Loan [program].”<sup>45</sup> For comparison, the average credit card interest rate in the U.S. as of July 8, 2024 was 24.84%.<sup>46</sup>

## Additional Considerations

In addition to the straightforward differences explained above, there are at least two other major sources of aid that affect many students’ abilities to pursue an education. Amounts of aid available from these sources vary widely, depending on a student’s household circumstances and educational institution, and therefore are not easily comparable.

<sup>41</sup> “What Are the Cal Grant Award Amounts,” California Student Aid Commission, February 1, 2018, <https://www.csac.ca.gov/post/what-are-cal-grant-award-amounts>.

<sup>42</sup> “Federal Pell Grants.”

<sup>43</sup> “Subsidized and Unsubsidized Loans.”

<sup>44</sup> Ibid.

<sup>45</sup> “Dream Loan | Office of Financial Aid and Scholarships | UCI,” UCI Office of Financial Aid and Scholarships, n.d., <https://www.ofas.uci.edu/paying-for-uci/loans/dream-loan.php>.

<sup>46</sup> Matt Schulz, “Average Credit Card Interest Rate in America Today,” LendingTree, July 8, 2024, <https://www.lendingtree.com/credit-cards/study/average-credit-card-interest-rate-in-america/>.

## PLUS Loans

PLUS loans are a type of unsubsidized loan provided via the Federal Student Aid program. PLUS used to stand for “parent loans for undergraduate students” but is now simply a vestigial moniker. These loans are available to parents of undergraduate students or directly to graduate and professional students for their own schooling. So long as the applicant has an adequate credit score (or even with an “adverse credit history” but the applicant “meet[s] additional requirements”<sup>47</sup>), one might use PLUS loans to cover even a large gap between cost in attendance and aid from other sources. According to the official FSA website, “[t]he maximum PLUS loan amount you can receive is the cost of attendance (determined by the school) minus any other financial aid received.”<sup>48</sup>

PLUS Loans can be a powerful benefit in support of a student’s ability to achieve a post-secondary education. For many, there are simply no other options for procuring money in these amounts for these purposes. Additionally, while interest rates could be said to be fairly high, they are fixed. Interest rates for PLUS Loans disbursed for the 2024-2025 school year have been fixed by the federal government at 9.08% for the life of the loan.<sup>49</sup>

## Nutrition Assistance

Undocumented students cannot access Supplemental Nutrition Assistance Programs (SNAP) services such as CalFresh. These programs make use of federal funding, which disqualifies undocumented individuals from directly benefiting. Nutrition assistance can make a major difference in the life of a college student; CSAC’s 2023 Food and Housing Survey “found that two-thirds (66%) of students were identified as food insecure.”<sup>50</sup>

## Documented Students and CADAA

While in the past it has been the case that documentation status fairly cleanly determined which financial aid application was utilized, shortcomings with the *Better FAFSA* have led to a state of affairs in which documented students are able to utilize the CADAA. With that option available, and in the face of America’s current anti-immigrant political milieu, some wary mixed-status families are opting for CADAA over FAFSA even when they don’t have to.

In doing so, they lose access to all facets of federal financial aid— Pell Grant, Federal Work-Study Program, Direct Subsidized and Unsubsidized Loans, and PLUS Loans. Importantly, they do not gain access to CA state aid programs that have been developed specifically to support undocumented students and which are normally applied for via CADAA—the Dream Loan Program and the California Dream Act Service Incentive Grant Program. Documented students applying for aid via the CADAA have **no access to any student loans and no access to any stipends or wages through service or work-study**. The only benefit to applying via CADAA as a documented student is gaining access to Cal Grants.

<sup>47</sup> “PLUS Loans | Federal Student Aid,” Federal Student Aid, n.d., <https://studentaid.gov/understand-aid/types/loans/plus>.

<sup>48</sup> Ibid.

<sup>49</sup> “Parent PLUS Loans,” Federal Student Aid, n.d., <https://studentaid.gov/understand-aid/types/loans/plus/parent>.

<sup>50</sup> “Food and Housing Survey,” California Student Aid Commission, February 1, 2018, <https://www.csac.ca.gov/food-and-housing-survey>.



Table 4. A Comparison of Aid Amounts Between Applications (CADAA vs. FAFSA) for a Documented Student

	Documented Student (via CADAA)	Documented Student (via FAFSA)	Difference
<b>Maximum Grant \$, nonspecialized</b>	<u>Cal Grant Program amounts</u>	The maximum Federal Pell Grant award was <b>\$7,395</b> for the 2023–24 award year (July 1, 2023, to June 30, 2024). <sup>51</sup> + <u>Cal Grant Program amounts</u>	<b>\$7,395</b>
<b>Money for work or service (estimate)</b>	none	Federal Work-Study (FWS) Program <sup>52</sup> estimate = federal minimum wage (\$7.25) * 20 hours per week * 32 weeks in a school year = <b>\$4,640</b>	<b>\$4,640</b>
<b>Loans (subsidized + unsubsidized)</b>	none	Dependent freshman = <b>\$5,500</b> , maximum <sup>53</sup>	<b>\$5,500</b>
<b>Total Difference in Available Student Aid</b>			<b>\$17,535</b>

As shown above in Table 4, the estimated disparity in aid amounts for documented students applying via CADAA vs. FAFSA is \$17,535 (not including PLUS loans). While this disparity is significant, it should be noted that for many students from mixed-status households who seek to attend post-secondary educational institutions for the 2024-2025 school year, their choices are to use CADAA to qualify for the Cal Grant program or to be blocked in filing a financial aid application and subsequently receiving zero financial aid.

## Modalities of Harm

Application delays and funding discrepancies have culminated in several different forms of harm to student populations, requiring differentiated responses.

### Some students opted to drop out from or not enroll in post-secondary education programs.

Shortfalls in funding have caused some students who were initially intending to continue or begin their college education in the 2024-2025 school year to not participate in educational programming during that period. This is, at best, a significant delay in their educations, and in fact poses a significant risk to them ever completing their degree programs at all. As Mark Kantrowitz wrote in a 2021 article based on his book *Who Graduates from College? Who Doesn't?*, “Students who take a leave of absence are less than half as likely to graduate with a

<sup>51</sup> “Federal Pell Grants.”

<sup>52</sup> “Work-Study Jobs.”

<sup>53</sup> “Subsidized and Unsubsidized Loans.”

Bachelor's degree within six years, [compared to those who attend continuously]."<sup>54</sup>

Dropouts due to financial causes are economically inefficient, as they represent students who could potentially have become college graduates and gone on to contribute more skilled labor, earn more money, and pay more taxes than they could without degrees. American Institutes for Research released a report in 2011 entitled *The High Cost of Low Graduation Rates: How Much Does Dropping Out of College Really Cost?*; even narrowing measurements and estimates to only those related to full-time students who started college in fall 2002 seeking a bachelor's degree but failed to graduate within six years, the report estimated that California's losses in state taxes were approximately \$386 million per year.<sup>55</sup> Further, the 2015 PPIC report *Will California Run Out of College Graduates* concluded that "If current trends in the labor market persist, by 2030 California will have a shortage of 1.1 million workers holding a bachelor's degree." Dropout prevention benefits everyone, not just students.

There are two cases inherent to this modality of harm— those who have never enrolled in post-secondary educational programs and were prevented from beginning or otherwise chose not to begin, and those who were enrolled in post-secondary educational programs and were caused to or otherwise chose to discontinue.

### **Some students enrolled in more affordable academic programs that were a suboptimal match for their goals and abilities.**

Some students from mixed-status households who experienced significant shrinkage in financial aid due to being obliged to apply via CADAA rather than FAFSA (as described in earlier sections of this report) opted to transfer to or enroll in academic programs that were more affordable but lower-quality matches for them. For example, a student accepted to or already attending UC Berkeley might instead enroll in a local community college. This inherently represents a disruption to schooling plans and likely a less efficient academic path toward students' goals.

If federal financial aid were to be reinitiated, these students would have the chance of resuming or initiating academic programs that are optimal for their goals and abilities; however, the barriers to reinitiation are non-negligible. In addition to having to apply to transfer from using CADAA to FAFSA and completing the FAFSA itself, students have to go through with the actual transfer to a different institution— possibly for the second time, if they had already transferred away from a program due to fluctuating financial aid. Further complicating matters, it is far from certain that community college courses taken while a student has transferred away from a four-year institution will transfer to count toward degree completion.

There are two cases inherent to this modality of harm— those who had never before enrolled in a post-secondary educational program and those who were enrolled in post-secondary educational programs prior to *Better FAFSA* delays and were caused to or otherwise chose to transfer to more affordable programs.

<sup>54</sup> Mark Kantrowitz, "Shocking Statistics About College Graduation Rates," Forbes, April 21, 2022, <https://www.forbes.com/sites/markkantrowitz/2021/11/18/shocking-statistics-about-college-graduation-rates/>.

<sup>55</sup> Mark Schneider and Lu (Michelle) Yin, "The High Cost of Low Graduation Rates: How Much Does Dropping Out of College Really Cost?" (American Institutes for Research, August 2011), [https://www.air.org/sites/default/files/downloads/report/AIR\\_High\\_Cost\\_of\\_Low\\_Graduation\\_Aug2011\\_0.pdf](https://www.air.org/sites/default/files/downloads/report/AIR_High_Cost_of_Low_Graduation_Aug2011_0.pdf).



## Many students enrolled in financial institutions without advance knowledge of their financial aid packages, resulting in high likelihood of financial hardship.

In many cases, *Better FAFSA* delays forced students to make their choice about which college or university to enroll in before they knew how much financial aid they would be receiving. This has sometimes resulted in students committing to participate in academic programs that will put them into states of financial hardship in the upcoming terms.

Financial stressors negatively affect academic performance and increase the likelihood of dropping out. In Trellis Research's Fall 2022 national aggregate report *Student Financial Wellness Survey*, 48% of respondents experiencing financial challenges reported "that they had difficulty concentrating on schoolwork because of their financial situation."<sup>56</sup> Further, in a February 2024 Gallup poll, 31% of polled college students who indicated they were considering withdrawing from their academic program said they would do so because of the cost of the program.<sup>57</sup>

## Suggested Institutional Intervention Strategies

### Foundations for Interventions:

- California college campuses should designate a group or organizational entity to provide targeted outreach and case management to students who have been affected by *Better FAFSA* disruptions and delays. Information should be gathered from school registrar and billing offices (and via direct outreach to students, where necessary) on students who have:
  - Dropped out
  - Transferred
  - Been invited to enroll but haven't done so
- On each college campus, this designated group should coordinate with the campus basic needs office (or equivalent) to assist students facing any kind of financial aid or basic needs insecurity as a result of *Better FAFSA* disruptions and delays.
- In order to identify students who have been harmed, colleges should add a question to future admissions applications which asks if applicants had been negatively impacted by *Better FAFSA* disruptions and delays in such a way that caused them to:
  - Withdraw from their educational institutions
  - Delay post-secondary educational enrollment, despite being invited to enroll at least one post-secondary educational institution
    - If so, which institutions had accepted their applications to attend?
  - Transfer educational institutions

<sup>56</sup> Carla Fletcher et al., "Student Financial Wellness Survey: Fall 2022 Semester Results" (Trellis Research, May 2023), [https://www.trelliscompany.org/wp-content/uploads/2023/05/SFWS-Aggregate-Report\\_FALL-2022.pdf](https://www.trelliscompany.org/wp-content/uploads/2023/05/SFWS-Aggregate-Report_FALL-2022.pdf).

<sup>57</sup> Stephanie Marken, "Black, Hispanic Students at Greatest Risk of Leaving Program: Emotional Stress, Mental Health, and Cost Are Top Reasons Students Consider Withdrawing," Gallup, February 28, 2024, <https://news.gallup.com/poll/611093/black-hispanic-students-greatest-risk-leaving-program.aspx>.

- Choose initial enrollment at an educational institution that was more affordable but less aligned with their goals

## Interventions Targeting Each Modality of Harm:

To support those who have been accepted but chosen not to attend any post-secondary educational institution for reasons related to *Better FAFSA* financial aid complications:

- Admissions offices should provide priority outreach to these students for some years following *Better FAFSA* delays.
- Admissions offices should consider extending their offer window to include the following school year, or consider re-inviting students to attend in the following year's round of offers of admission to incoming students.
- In the years immediately following *Better FAFSA* delays, if a student in this condition re-applies for a program they had been accepted to, admission offices should give them priority admission status.
- In order to identify students harmed in this way, colleges should add a question to future admissions applications which asks if applicants had been negatively impacted by *Better FAFSA* delays and felt that they could not accept their initial acceptance offers.

To support those students (sophomores and above) who had been attending a post-secondary educational program but chose to exit in response to *Better FAFSA* delays:

- Colleges should provide an accessible re-entry pathway for these students to re-enroll for the following quarter/semester, supporting them with emergency wrap-around services support and financial aid as needed.
- In cases where students have dropped out of universities, the universities should create partnerships with local community colleges at which these students can continue their degrees (seeking associate degrees or later transfers). Universities and community colleges should coordinate such that the students' existing progress toward degree completion transfers as completely and seamlessly as possible.
- Colleges should extend the window for which students are permitted to re-enroll without having to re-apply, and should consider abolishing the requirement altogether.

To support those students who are transferring educational institutions because of financial aid disruptions relating to *Better FAFSA* failures:

- Admissions offices should give priority to these students if they apply for readmission to their preferred institution when financial aid issues are resolved.
- Admissions and financial aid offices across all California post-secondary educational institutions should develop and utilize a shared method of flagging and tracking cases (e.g. "high-probability transfer students") of students in this condition.
  - Students with this associated tag/flag should be given prioritization in class registration/enrollment.

To support those students whose financial obligations due to enrollment commitments cause financial hardship, and who were forced to make enrollment decisions without knowledge of their financial aid awards due to *Better FAFSA* delays:

- Having been impacted by *Better FAFSA* disruptions and delays should be regarded as a qualifying hardship condition in Satisfactory Academic Progress (SAP) appeals.<sup>58</sup>
- Some campus-based institutional aid should be allocated as emergency financial aid for students impacted by *Better FAFSA* delays.<sup>59</sup>
  - For cases in which documented students from mixed-status households have been obligated to apply for student aid via CADAA rather than FAFSA due to FAFSA shortcomings, campuses should work to use aid sources such as this to “backfill” gaps between awarded and projected aid amounts.
- To minimize barriers to restoring federal aid, financial aid departments should make the transfer of CADAA to FAFSA an automatic and straightforward opt-in button for students through their financial aid portals (as opposed to an external G-55 CSAC form that students currently have to fill out).
- Campus representatives should provide regular notices to students who have opted out of FAFSA in favor of CADAA that they are missing out on financial resources and that their information is protected and secure.

## Legislative and Policy Recommendations to Address Barriers Around FAFSA

Policy recommendations are a crucial component to making systems-level change regarding FAFSA and the barriers for mixed-status households. Decreasing barriers regarding FAFSA completion and the process of understanding what FAFSA entails in the form of outreach through trusted sources of information is a crucial component of our recommendations. Policy recommendations that include these two components will help families and individuals navigate FAFSA and understand what is best for them given their situation.

Outlined below are current (summer 2024) pieces of legislation that should be passed to decrease these barriers and help students and their families/guardians understand what FAFSA is and how to go through the process. While these two legislative pieces are already in the legislative process, similar legislation that is introduced in future legislative cycles should provide support for families in outreach from a trusted source of information to provide guidance regarding FAFSA completion.

### AB 2500

AB 2500 is in the California legislative cycle, currently in the Senate Chamber, and has support from Assemblymember Mike Fong as he has introduced the bill.<sup>60</sup>

<sup>58</sup> “SAP Appeals,” FinAid, March 5, 2020, <https://finaid.org/educators/pj/sapaappeals/>.

<sup>59</sup> Some campuses have independently enacted initiatives along these lines, and they serve as important examples for contextual consideration: CSU Monterey Bay, UC Merced, and, more generally, UC’s Blue and Gold Program.

<sup>60</sup> “California AB2500 | 2023-2024 | Regular Session,” LegiScan, n.d., <https://legiscan.com/CA/bill/AB2500/2023>.

AB 2500, introduced by Assemblymember Mike Fong, seeks to allow more flexibility in handling financial aid deadline extensions for families in California. Specifically, Assemblymember Fong is proposing the following amendments to existing statute AB 1774:

1. Allowing the Executive Director, instead of the commission grant deadline postponements
2. Extending the submission deadline from 10 to 15 days after a qualifying event
3. Requiring report of extension events to the commission
4. Enabling automatic deadlines for certain qualifying events

## AB 2165

AB 2165 is in the California legislative cycle, currently in the Senate Chamber, and has support from Assemblymember Eloise Gómez Reyes as she introduced the bill.<sup>61</sup>

AB 2165, introduced by Assemblymember Eloise Gómez Reyes, seeks to inform students and their parents about opting out of filling out the FAFSA. Specifically, Assembly member Reyes is proposing the following additions to the current law:

Informing Families on Information Regarding FAFSA Exemption:

1. Before exempting, the school must arrange a meeting between the student and guidance counselor to provide important information on exempting them from filling out the FAFSA.
2. If the student is exempted, the school must notify the students parent/guardian

School Requirements:

3. Must report number of the opt-out forms that are submitted every year to their district authority
4. Must publish data on the opt-out forms and FAFSA/California Dream Act completion rates on the school website

## Further Support For Future Pieces of Legislation:

EdVoice:

A nonprofit organization dedicated to advocating for equity and access in educational policy for underserved students. They are known for their advocacy efforts around educational policy and could be used to garner further support for these pieces of legislation in their final rounds of the legislative cycle. Furthermore, with future protections for mixed-status households surrounding educational policy and FAFSA/CADAA being brought to the state legislature, this group would be useful to leverage as an advocacy partner.

Public Advocates:

<sup>61</sup> "California AB2165 | 2023-2024 | Regular Session," LegiScan, n.d., <https://legiscan.com/CA/bill/AB2165/2023>.

A nonprofit law firm that focuses on multiple issues including educational policy with their mission of “ensuring California provides all students the opportunity to access and graduate from its three public systems: the University of California, the California State University, and the California Community Colleges”.<sup>62</sup> Reaching out to this group to push for the passage of future educational equity policy regarding barriers to FAFSA is important as they have worked on supporting similar legislation. They have experience with advocating for policies on student aid policy and access to higher education, which are the foundation of our research.

## Increased Outreach

No matter the specific circumstances, until significant improvements in the U.S. Department of Education’s financial aid application process are implemented at the federal level, the best way for state and regional entities to support students and families may simply be to educate them about the financial aid process and their options within it.

## Myths and Anxieties about FAFSA Participation among Mixed-status Families

When reflecting on the hesitance many undocumented people feel when interacting with government entities, especially federal ones, it may be valuable to consider the parallelism between education and healthcare. Both are important types of services that often come packaged in intimidating, hierarchical institutions. Consider the following example:

In 2018, doctors’ offices and hospitals saw a decline in the number of patients from mixed-status households seeking care. This coincided with the implementation of policies granting Immigration and Customs Enforcement (ICE) broader authority to pursue undocumented immigrants. Reports spread that ICE agents started targeting areas traditionally considered “safe havens” or sensitive locations, including hospitals, medical treatment facilities, schools, churches, and public demonstrations.<sup>63</sup> While the ICE website clarifies that apprehensions at sensitive locations will only occur under exigent circumstances, during other law enforcement actions, or with prior approval, this policy still sparked panic in undocumented households, leading to a decline in seeking healthcare.

**Fear of deportation** and a **lack of knowledge** were **significant barriers** that prevented immigrants from seeking medical care.<sup>64</sup> Just as the fear of deportation stops undocumented immigrants from trying to get medical help, the fear of deportation combined with a lack of knowledge about the application process can be a significant barrier to FAFSA completion.

<sup>62</sup> “Higher Education: Erase the Barriers College Students Face in California,” Public Advocates, n.d., <https://publicadvocates.org/our-work-2/higher-education/>.

<sup>63</sup> Rebecca Adams, “Immigration Crackdown Raises Fears of Seeking Health Care,” Roll Call, January 25, 2018, <https://rollcall.com/2018/01/25/immigration-crackdown-raises-fears-of-seeking-health-care/>.

<sup>64</sup> Karen Hacker et al., “Barriers to Health Care for Undocumented Immigrants: A Literature Review,” Risk Management and Healthcare Policy 8 (October 30, 2015): 175–83, <https://doi.org/10.2147/RMHP.S70173>.

Data collected by the FAFSA is protected under federal law, primarily under the Family Educational Rights and Privacy Act (FERPA).<sup>65</sup> This prohibits anyone from using applicants' information for anything other than calculating federal and state financial aid.<sup>66</sup> Entities with access to this data, such as colleges the student indicated they wanted to attend, are also required to protect against security threats and unauthorized users. The U.S. Department of Education has confirmed that "Any federal agency that receives this information from [the Department of Education] can only use the data for the explicitly authorized purposes. This does not include any immigration or enforcement actions."<sup>67</sup> Effectively, ICE cannot retrieve the information applicants enter while completing the FAFSA.

In addition to federal protections, California is what is known colloquially as a "sanctuary state," meaning approximately that the state works to prioritize the protection of its undocumented residents over compliance with federal organizations such as ICE. The California Values Act (SB 54) went into effect January 1st, 2018. This law states that no state and local resources can be used to assist federal immigration enforcement, meaning that schools, hospitals, and courthouses are safe spaces for everyone in the community.<sup>68</sup>

## CSAC's Existing Outreach Programs

The California Student Aid Commission (CSAC) carries out significant educational outreach through its Cash For College Program, the California Student Opportunity and Access Program (Cal-SOAP), and its partnerships with various nonprofit community organizations.

- Cash for College is CSAC's principal financial aid education program, providing both general and specific-topic webinars and in-person workshops.<sup>69</sup>
- Cal-SOAP is a targeted support program that works in communities with documented low eligibility or college participation rates in California to increase understanding of how to navigate the post-secondary education administrative and financial aid processes.<sup>70,71</sup>

CSAC works to keep their outreach accurate and up to date with the latest information on the FAFSA. As Jake Brymner, Deputy Director for Policy & Public Affairs for the Commission, put it:

The Commission has expanded its Cash for College Program by creating a comprehensive Cash for College curriculum specifically for students from mixed-status backgrounds that provides them with all of their options, including costs and benefit considerations. Further, the Commission has centralized all resources for mixed-status students in a landing page that can be translated into multiple languages. The Commission is actively working to translate our stand-alone materials in multiple languages beyond English and Spanish.<sup>72</sup>

<sup>65</sup> "Family Educational Rights and Privacy Act (FERPA)," Guides (US Department of Education (ED), August 25, 2021), <https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>.

<sup>66</sup> "FAFSA Resources for Mixed Status Families," Higher Ed Immigration Portal, May 13, 2024, <https://www.higheredimmigrationportal.org/policy/fafsa-resources-for-mixed-status-families/>.

<sup>67</sup> Ibid.

<sup>68</sup> "California Values Act (SB 54)," ACLU of Southern California, June 10, 2019, <https://www.aclusocal.org/en/know-your-rights/california-values-act-sb-54>.

<sup>69</sup> "Cash For College," California Student Aid Commission, n.d., <https://www.csac.ca.gov/cash-college>.

<sup>70</sup> "California Student Opportunity and Access Program (Cal-SOAP)," California Student Aid Commission, February 1, 2018, <https://www.csac.ca.gov/california-student-opportunity-and-access-program-cal-soap>.

<sup>71</sup> "Cal-SOAP Fact Sheet" (California Student Aid Commission, n.d.), <https://csac.ca.gov/sites/main/files/file-attachments/calsoapfactsheet.pdf>.

<sup>72</sup> Jake Brymner, Jason Henderson, Daniela Rodriguez. Email correspondence with Maddison Brumbaugh, Donielle Dixon, Noah Sary, 06/28/2024.

This shows that CSAC has many offerings aimed at mixed-status households, who have been so affected by *Better FAFSA* disruptions and delays.

CSAC also has a robust system for training and aligning with community partners who are interested in bringing increased understanding of post-secondary financial aid processes to their communities. Anyone, from individual volunteers to community organizations to local Parent-Teacher Associations to representative of large corporate entities, can register and attend a CSAC Cash for College Train the Trainer session, complete the related official survey, and subsequently be officially designated as a community outreach partner whom CSAC keeps updated on financial aid changes. “Once trained, Cash for College Community Champions can host workshops to help students and families complete their financial aid applications.”

## Suggested Outreach Expansion

CSAC mentioned in a private interview that with increased support or resources they would prioritize expansion of outreach to the following three sub-populations:

- Parents – The vast majority of current outreach focuses on students, but parents have to complete their own contributor profiles within the *Better FAFSA*, and they’re often caught up in the misconception that providing their information puts them at risk in various ways.
- Adults – Very little financial aid outreach is currently aimed at people outside the traditional student pipeline.
- Speakers of languages other than English and Spanish – Minority Language groups are not often served adequately in current outreach efforts.<sup>73</sup>

Existing programs that already have strong ties to these communities should work to expand their capacity to provide information about financial aid. Even a single staff member participating in CSAC’s Train the Trainer program could make a large difference by providing accurate, up-to-date information to relevant populations. Translating outreach materials or facilitating events could further increase impact. Another important step would be to begin tracking metrics such as financial aid application assistance instances or financial aid application completion among their relevant populations.

In this era of California experiencing a budget deficit, ideal candidates for this work are those which are already sustainably funded. Some organizations which are examples of good potential candidates for this work are:

- [UC’s Student Academic Preparation and Educational Partnerships \(SAPEP\) Program](#)<sup>74</sup>
- [CSU’s Educational Opportunity Program \(EOP\)](#)<sup>75</sup>
- [The Regional K-16 Collaboratives](#)<sup>76</sup>

These organizations are both sustainably funded and already heavily involved with many marginalized communities who are likely to benefit from more targeted outreach relating to financial aid. Longer-term plans for financial aid education and outreach are likely to be

<sup>73</sup> Jake Brymner, Jason Henderson, Daniela Rodriguez. Interviewed by Maddison Brumbaugh, Donielle Dixon, Noah Sary, Zoom 07/03/2024.

<sup>74</sup> “Student Academic Preparation and Educational Partnerships (SAPEP): Annual Report Highlights” (University of California Office of the Vice Provost Education Partnerships, November 2014), <https://k12programs.universityofcalifornia.edu/files/documents/sapep-report.pdf>.

<sup>75</sup> “Educational Opportunity Program (EOP),” CSU | The California State University, n.d., <https://www.calstate.edu/443/attend/student-services/eop>.

<sup>76</sup> “Regional K-16 Education – Collaboratives Grant Program,” Regional K-16 Education – Collaboratives Grant Program, n.d., <https://k16collaborative.org/>.



significantly affected by the Governor's Career Education Master Plan, discussed in the next section.

## Next Steps

### Career Education Master Plan

Big changes are on the horizon for education in California. "On August 31st [2023], Governor Gavin Newsom signed an executive order that directs key state agencies and higher education institutions to develop a Master Plan for Career Education that will align and integrate recent investments in education and workforce programs, many of which are currently siloed across various state agencies."<sup>77</sup> With this consolidation and standardization of education-related efforts in California, leadership has communicated that they hope to increase socioeconomic mobility and bridge the gap between CA's available workforce and its many open skilled-labor career positions. "California, like most states in the nation, has workforce shortages in just about every single sector," said State Superintendent Thurmond. "This presents the opportunity for us to use our pathway programs to propel our students into the workforce."<sup>78</sup>

"On January 24th, 2024, the Governor's Office hosted a webinar kicking off the Master Plan for Career Education process."<sup>79</sup> The plan will be finalized in fall 2024<sup>80</sup> and implementation will begin soon after. This state-wide initiative will likely have a large effect on education-related groups and programs, especially those focused on adult education. The prioritization and integration of adult education that has already been announced in Career Education Master Plan documents that have been released<sup>81</sup> may lead to a significant boost in attention and funding in the sector.

In a private interview with this report's researchers, CSAC Co-director of Outreach Jason Henderson indicated that one key area in which he perceives there to be much room for growth in California is in enhancement of workforce training support.<sup>82</sup> Many adults are inclined to seek certifications or participate in specialization programs, but much of CSAC's existing outreach programs (such as Cash for College and Cal-SOAP) are put on in collaboration with high schools and colleges. More generalized community outreach that does occur is often quite difficult to discover or participate in for busy adults who are often working parents.

As part of the reprioritization efforts inherent to the Career Education Master Plan, additional funding should be allocated to CSAC to build out an outreach program that specializes in targeting adults and enhancing workforce training support. This could involve creating specialized versions of Cash for College and/or Cal-SOAP programming, or building completely new outreach strategies. Increased funding may require legislative efforts, or there may be opportunities within the structure of the new executive order.

<sup>77</sup> "Governor's Executive Order on Master Plan for Career Education," California EDGE Coalition, September 11, 2023, <https://www.caedge.org/ca-edge-coalitions-overview-of-the-2023-24-enacted-state-budget-copy/>.

<sup>78</sup> Emma Gallegos, "Gov. Gavin Newsom Signs Executive Order for a Master Plan for Career Education," EdSource, August 31, 2023, <https://edsources.org/2023/gov-newsom-signs-executive-order-for-a-master-plan-for-career-education/696791>.

<sup>79</sup> Ibid.

<sup>80</sup> "Master Plan for Career Education Core Concepts" (California Governor's Council for Career Education, January 18, 2024), <https://careereducation.gov.ca.gov/wp-content/uploads/sites/18/2024/01/Summary-of-Career-Education-Master-Plan-Core-Concepts-FINAL-1.pdf>.

<sup>81</sup> Ibid.

<sup>82</sup> Brymner, Henderson, Rodriguez, interview.



## Graduate Students

While this report has been focused on undergraduate students, the shortcomings of the *Better FAFSA* affect graduate and undergraduate students alike. Most interventions and protections are aimed at the larger undergraduate population so as to help as many people as possible with the limited resources that are available. The pathways to an advanced education, however, are quite precarious for undocumented students and those from mixed-status households. When advancement is so difficult and specialization is so restricted, shortages of available skilled labor in our economy are exacerbated.

## Conclusion

The disruptions caused by the COVID-19 pandemic and the *Better FAFSA* implementation highlight the vulnerability of our at-risk students in the context of our current support systems. These events underscore the critical need to prioritize proactive measures.

We recommend building flexible and adaptable safety nets that can be readily activated in response to unforeseen challenges. This will ensure continued support for our most vulnerable student populations during periods of disruption.

Currently, marginalized student populations bear the brunt of societal disruptions due to limited resources and the lack of a buffer against external forces. Implementing the recommendations outlined in this report could lead to a more robust and resilient support system for marginalized student populations in California.

## Glossary

**Better FAFSA:** A redesign of the original Free Application for Federal Student Aid (which was in place from 1992 to 2023). The *Better FAFSA* “soft-launched” on December 30th, 2023 for use in determining student aid allotments for the 2024-2025 academic school year.

**CADAA:** The California Dream Act Application is a California-specific financial aid application that allows undocumented students who meet certain criteria to apply for state-based financial aid for their education.

**CSAC:** The California Student Aid Commission is the principal state agency responsible for administering financial aid programs for students attending public and private universities, colleges, and vocational schools in California.

**DACA:** Deferred Action for Childhood Arrivals is a federal policy which temporarily shields Dreamers from deportation and provides them work authorization with possible renewal every two years. Dreamers are undocumented immigrants who came to the United States as children.

**DSIG:** The California Dream Act Service Incentive Grant is a grant of up to \$4,500 per academic year for undocumented students who complete 300 hours of service with qualifying community partner organizations. It's awarded to up to 1,667 eligible students each year, and they must meet ongoing Satisfactory Academic Progress standards each term to remain in the program.

**FAFSA:** The Free Application for Federal Student Aid is a standardized federal form completed by current and prospective college students in the United States to determine their eligibility for student financial aid

**Federal Aid:** Funding that is available exclusively to students attending post-secondary educational institutions in the United States, designated for use on education-related expenses

**FERPA:** The Family Educational Rights and Privacy Act is a federal law pertaining to privacy of student data. While complex, the relevant aspect is that this law is widely regarded to be one of the most explicit protections of the privacy of data shared with the Department of Education, including data of undocumented immigrants.

**FSA:** Federal Student Aid is the office of the U.S. Department of Education that is responsible for managing the student financial assistance programs that provide grant, work-study, and loan funds to students attending college or career school.

**ICE:** U.S. Immigration and Customs Enforcement is a federal law enforcement agency under the U.S. Department of Homeland Security. ICE's stated mission is to "[p]rotect America through criminal investigations and enforcing immigration laws to preserve national security and public safety."

**Mixed-status Household:** While technically this is any household in which at least one undocumented person lives with at least one documented person, for financial aid purposes this is usually understood to refer to a household in which a documented student has at least one undocumented parent or guardian.

**Natural-Born Citizen:** Someone who was a U.S. citizen at birth

**Naturalized Citizen:** Someone who was not born a U.S. citizen, but who at some point completed the legal process to become a U.S. citizen

**Permanent Resident:** Someone who is not a U.S. citizen but who has completed the requirements to legally live and work permanently in the U.S. (Also called "green card holder" due to the original coloration of the official Permanent Resident Card.)

**State-based Aid:** Financial support offered to students by state (rather than federal) government entities

**TPS:** Temporary Protected Status is a U.S. immigration status provided to nationals of specifically-designated countries that are confronting an ongoing armed conflict, environmental disaster, or other extraordinary-yet-temporary condition.

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