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Committee on Health, Education, Labor and Pensions**

**Hearing: “Time to Finish Fixing the FAFSA”  
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***Written Statement of:***

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Chairman Alexander, Senator Murray, and Members of the Committee, thank you for the opportunity to appear before you today. As we consider ways to improve the financial aid system in the United States and the Free Application for Federal Student Aid (FAFSA), my testimony aims to provide information on the following topics:

- Concerns about the current financial aid system and the FAFSA
- Recent data and research on how the current barriers are impacting college access, persistence, and graduation
- Highlight reforms to the FAFSA that could better address the needs of students and families

Finally, I close with recommendations about we can improve the federal financial aid system

### **THE IMPORTANCE OF FINANCIAL AID**

#### ***Financial aid increases the likelihood of college enrollment.***

Research demonstrates that grants have positive effects on college enrollment (Deming and Dynarski, 2010; Dynarski and Scott-Clayton, 2013). For example, Kane (2003; 2004) found that two state need-based aid programs, the Cal Grant and the D.C. Tuition Assistance Grant, each had positive effects on college access for low-income students. The former provides grants for students to attend four-year colleges in California, while the latter allowed D.C. residents to pay in-state tuition rates at public universities across the country. Dynarski (2000; 2004) found even larger effects (4 to 6 percentage-point increases) among a set of state financial aid programs. As shown by these studies and others (e.g., Long, 2007), grants can be an effective way to increase college enrollment.

#### ***Financial aid also has an important role in supporting college persistence and degree completion.***

Financial aid can also be an important policy lever for increasing rates of college persistence and degree completion. In my study of the Florida Student Access Grant (FSAG), a need-based grant that gave low-income students an additional \$1,300 in support, we found financial aid to have a positive impact on a host of short-, medium-, and long-term college outcomes. The additional \$1,300 in grant aid eligibility (in 2000 dollars) increased the

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\* Note: The views expressed are those of the author and should not be attributed to Harvard University or the NBER.

probability of immediate enrollment at a public, four-year university by 3.2 percentage points while also increasing the probability of staying continuously enrolled through the spring semester of students' freshman year by 4.3 percentage points for students eligible for FSAG. Most importantly, the additional \$1,300 in aid eligibility increased the probability of earning a bachelor's degree within six years by 4.6 percentage points, or 22 percent (Castleman and Long, 2016).

It is important to note that the FSAG was awarded on top of the Pell Grant—eligible students would have qualified for both the \$1,300 FSAG and at least a \$1,750 Pell Grant. As such, our results address the question of whether increasing the size of current aid awards would have positive effects on college outcomes (as opposed to questions about the effects of some aid versus no aid). Overall, our results suggest that not only does need-based aid have a positive effect on persistence and degree completion, but also that increasing the award amounts of current aid programs could have beneficial, cost-effective results. Other research has also found that need-based financial aid can improve college completion rates (Bettinger, 2015; Goldrick-Rab, Kelchen, Harris, and Benson, 2016).

### **CONCERNS WITH THE FINANCIAL AID SYSTEM**

*It is very challenging, especially for students from low-income families, to navigate the higher education system.*

College attendance is the culmination of a series of steps and benchmarks. First, students must aspire to attend college or derive aspirations from their parents, teachers, and/or mentors. In addition, they must prepare academically for college by taking the proper classes and getting a sufficiently high grade point average, particularly if they wish to attend a selective institution. To gain entry into a four-year college, students must also register for a college admissions exam (i.e. the SAT or ACT). As they approach the college choice decision, students and their families must contend with the difficulty of simultaneously ranking options along multiple dimensions including measures of quality, academic offerings, cost, and location. Then they must put this information in perspective with their own personal situations and preferences. Families must also discern differences in quality, or the likelihood that the school will impart learning, support student success, and result in future benefits. Such differences are hard to detect as measurements of quality in higher education tend to rely more on the characteristics of the entering student body rather than the value added by the institution or the benefits realized by graduates (Long, 2010a). Difficulty sorting colleges by characteristics and quality is coupled with complicated pricing structures, in which the net price each student pays often differs due to government and institutional financial aid. These choices carry on throughout the enrollment experience as students must constantly reevaluate if their enrollment decision is likely to pay off.

In essence, the process of preparing, choosing, and enrolling in higher education is incredibly complex and involves many small decisions and actions that must be taken in the right order and at the right time. The process extremely difficult for many families to decipher and navigate, especially for low-income families and potential first-generation college students. Numerous studies have found that students are often unaware of the necessary steps or even what questions they need to ask in order to take the steps towards college enrollment (Bettinger, Boatman, and Long, 2013; Page and Scott-Clayton, 2016).

***The complexity of the financial aid system is a major barrier to students receiving support.***

The financial aid system is itself incredibly complex. To determine eligibility, students and their families must fill out the Free Application for Federal Student Aid (FAFSA). Not surprisingly, students and their families are often confused and even deterred by the form (ACSFA, 2005). In 2006, the Spellings Commission on the Future of Higher Education acknowledged problems with the current aid process by concluding that some students “don’t enter college because of inadequate information and rising costs, combined with a confusing financial aid system” (2006, p. 7). While cost and academic preparation are important hurdles for students, the role of information is also substantial in determining college access and persistence.

More recently, it has been shown that the federal aid application barrier is especially challenging for families from low-income backgrounds (Bettinger et al., 2012). Such evidence has led many to conclude that the complexity of our financial aid policies results in them not being as effective as they could be. (Dynarski & Scott-Clayton, 2013). This is underscored by the fact that financial aid programs that are simple to access and well-known among eligible families have the largest estimated effects on college outcomes (Long, 2010).

***There is also confusion about how to renew aid and financial aid award rules, resulting in lost or reduced support to help them persist in college.***

While completing and submitting the FAFSA is a good first step, students need to do this each year to maintain their aid awards, and unfortunately, college students are often unaware of this fact. Bird and Castleman (2016) suggest that about one in five first-year Pell Grant recipients in good academic standing do not re-file their FAFSAs successfully, and these students tend to be concentrated at community colleges. Furthermore, they estimate that over half of previous Pell recipients did not reapply for aid, pointing to inaccurate beliefs about continued aid eligibility as the impetus for this. Additional work by Bettinger, Long, and Lee (2020) underscores the problem of students not renewing their financial aid awards due to misunderstandings about the FAFSA process.

Bird and Castleman further observe that students who fail to renew their FAFSAs are less likely to persist in college over the long term. This is not surprising given the evidence cited above about the causal relationship between aid and educational attainment, but it is important to separate students who do not resubmit a FAFSA due to lack of information versus those who have decided ahead of time not to continue in college.

Students also fail to understand how financial aid awards relate to enrollment choices (Bettinger, Long, and Lee, 2020). For example, students often do not realize how taking more college credits could entitle them to additional financial aid. Based on the financial aid calculator, a student with a zero Expected Family Contribution (i.e., the family’s resources are so low that they are not expected to help pay for college) would receive \$1,444 for enrolling in 8 credit hours, but receive \$2,166 for enrolling in 9 credit hours, a difference of \$722. At many community colleges, this gain in financial aid would more than cover the cost of an additional three-credit course. Attending college part-time is considered a risk factor that is correlated with lower rates of degree completion, and while this is not necessarily a causal statement, encouraging a student to complete their degree in fewer semesters (i.e., a shorter amount of time) reduces the likelihood of progress being derailed by external circumstances.

***There are many negative consequences of having a complicated financial aid system.***

There are many negative and far-reaching repercussions due to the complexity of the college investment combined with the lack of clear information. This translates to keeping some students out of higher education. Among those who do decide to attend, some college students forego aid they are eligible to receive. An American Council on Education (ACE) study found that 850,000 students who would have been eligible for federal financial aid did not complete the necessary forms to receive such aid (King, 2004). Kantrowitz (2009) estimated that about four in ten undergraduates do not complete the FAFSA and about one-quarter of this group would be eligible for the Pell Grant. More recently, a 2011 study found many students fail to complete the necessary forms, with only 43.5 percent of students at community colleges completing the FAFSA in 2011 according to the last National Postsecondary Student Aid Study (NPSAS), the NCES' nationally representative survey focusing on how students pay for college. Some students may have good information that they are ineligible for need-based federal grants (i.e., due to high incomes or not taking enough credits) and choose not to apply, but these students are still eligible for federal loans and may qualify for state or institutional aid programs that have much higher or no income requirements. Overall, estimates range from about 13 to 23 percent of students who are potentially eligible for financial aid that do not apply (King, 2004; Kofoed, 2017).

With increasing information about high debt burdens and low graduation rates at some college, it is clear that the college investment can be a high-risk proposition. While the average return to a postsecondary credential is substantial and justifies the cost in most cases, there is wide variation in the returns to a degree based on the specific college attended and the major completed. Moreover, nearly half of college entrants do not graduate at all and so forfeit the potential returns to a degree. Oppressive loan burdens and rising student loan defaults also suggests evidence of bad college choices. Some companies have also exploited the heightened need for information by charging families excessive amounts for college facts that are freely available elsewhere if one knew how to navigate through the multiple sources that focus on higher education. This underscores the necessity of a clear and informed college decision process.

**SIMPLIFICATION IS A POWERFUL POLICY TOOL**

***An intervention to simplify the FAFSA had meaningful, positive results.***

As noted above, lack of information and the complexity of the financial aid application process are major barriers to college access. However, as research has shown, simplification is an important way to improve outcomes. In 2008 and 2009, using a random assignment research design, my research team designed and implemented an intervention to provide low- to moderate-income families receiving tax preparation help free additional assistance in completing and filing the FAFSA (Bettinger *et al.*, 2012). The just-collected tax information was used to pre-populate the FAFSA, and then individuals were guided through remaining questions to complete the form in less than 10 minutes (including completely the research consent form and background survey). Families were also given an immediate estimate of their eligibility for government aid as well as information about local postsecondary options.

The results suggest that streamlining and providing assistance with the FAFSA had a substantial positive impact on the likelihood of submitting an aid application. The FAFSA

treatment substantially increased college financial aid applications, improved the timeliness of aid application submission, increased the receipt of need-based grant aid, and ultimately increased the likelihood of college attendance and persistence.

- Assistance with the FAFSA increased the likelihood of submitting the aid application substantially.
  - FAFSA submissions increased 39 percent for seniors in high school, from 40 percent for the control group to 56 percent for the treatment group.
  - Aid application submissions increased 186 percent, from 14 percent to 40 percent, among independent students (those age 24 and above or who were married, a parent, or a veteran) who had never been to college before. This translates to an almost *tripling* of the number of potential students who submitted an aid application.
  - FAFSA submissions increased 58 percent for independent students who had previously attended college, from 35 percent for the control group to 56 percent for the treatment group. This suggests there are large numbers of students in college who are foregoing financial aid they are eligible to receive because they have not completed the FAFSA.
  - Compared to the control group, FAFSA's were filed over one month earlier for high school seniors and almost three months earlier for independent students. This has implications for the treatment group in terms of increased eligibility for state and institutional financial aid programs.
- Receiving assistance on the FAFSA significantly increased college enrollment.
  - Among graduating high school seniors, there was a substantial increase of 7 percentage points in college going (34 percent compared to 27 percent among the group who did not receive any FAFSA help or information).
  - Among older, independent individuals who had completed high school or a GED but not attended college previously, the number enrolled in college and receiving financial aid increased by about 2 percentage points. Given that only 10 percent of the control group did this, the program effect represents a 20 percent increase.
  - The effect seems to be concentrated among those with incomes less than \$22,000. This corresponds to the point at which individuals are not expected to contribute anything to college expenses (i.e., they have EFCs of zero).
  - The program also increased the percentage who received a federal student grant.

These results suggest that streamlining the aid application process could be an effective and efficient way to improve college access for low-income students. The effects of the FAFSA treatment are large, especially relative to the intervention's low marginal cost in terms of resources and time—providing FAFSA assistance took only 8 minutes, on average. It is also important to emphasize that once they entered college, the students persisted. Three years after the intervention, we found that students who attended college after receiving assistance with the FAFSA were persisting at higher levels and had higher educational attainment than their counterparts who had not received the streamlined process. In other words, they were able to succeed in college even though the barrier of the FAFSA process would have kept them out of school. These findings suggest other opportunities for streamlining processes and providing quick assistance could increase greatly participation in programs that require filling out forms to become eligible.

While the project above emphasizes the benefits of providing assistance and a streamlined process to complete the FAFSA, we did not similarly find positive effects from just giving families information about their aid eligibility. In the context of the FAFSA project, we told a random subset of families the amount of a Pell Grant they were eligible to receive if they completed the FAFSA by themselves. Unfortunately, families who received aid information but no assistance with the FAFSA did not experience improved outcomes. This suggests information alone is not enough to help families overcome barriers in the college enrollment process, and the complexity of the FAFSA and/or the burden of navigating through the application process alone are significant barriers. However, it is possible that earlier information could generate more positive effects.

### **ADDITIONAL SIMPLIFICATION IS NEEDED: RESEARCH ON CONTINUING CONCERNS**

*There has been important progress in reforming the FAFSA in recent years.*

Given the many critiques of the FAFSA, there have been numerous calls to simplify the financial aid process, and some progress has been made in recent years. This includes efforts to simplify the existing online FAFSA, including introducing skip-logic to minimize the number of questions. Moreover, the Data Retrieval Tool (DRT) allows applicants and parents to import IRS income tax data. Another change has been the switch to using Prior-Prior-Year income data, which allows families to complete their FAFSAs sooner. Most recently, the FUTURE Act will eliminate up to 22 questions on the FAFSA and allow the Internal Revenue Service to share applicants' tax information directly with the U.S. Department of Education.

*While there have been recent improvements to the FAFSA, these efforts do not fully address the needs of many students, and there is still significant room for improvement.*

While recent reforms have begun to address a number of the concerns related to the FAFSA, students and families continue to grapple with a complex system that fails to meet many of their needs. For example, the recent improvements to the FAFSA still require families to be aware of the form and process. Many families still do not know that the FAFSA exists and how to access it. No amount of simplification will help if individuals do not actually access the form. Additionally, many individuals, particularly low-income students, often greatly overestimate the cost of higher education) and so do not bother completing form because they do not think they can afford college or will qualify for financial aid. As discussed below, it is clear the complexity of the process still hampers many students and families.

Additionally, the improvements related to prepopulating the form with IRS information are not helpful to non-filers. Moreover, as we saw with the initial implementation of the DRT, the IRS pre-population was not available to all individuals, and technical requirements also made the process challenging. Students and parents can only access the IRS data retrieval if they have a filed a tax return, have a valid social security number, an unchanged marital status, no amended tax return, a filing status that is not married filing separately, and a federal student aid pin.

It is also the case that to benefit from the simplified form and process (i.e., skip logic and pre-population using data from the IRS), student must have access to a private, online computer, preferably with high-speed internet, a problem for many low-income families. An additional

impediment is the number of times a family must revisit the FAFSA to complete it. As shown in our FAFSA Project, streamlining the process by allowing participants to submit the FAFSA immediately had large, positive effects. With each additional delay, families are less likely to fully complete the process.

### ***Recent research on FAFSA awareness and submissions***

In recent work, we investigate experiences with the FAFSA for a nationally representative subsample of over 15,000 college students from the 2015-16 National Postsecondary Student Aid Study (NPSAS:16). In a randomized controlled trial (RCT), and under a unique partnership with the National Center for Educational Statistics, we implemented a set of interventions designed to address students' lack of awareness about financial aid eligibility, FAFSA application procedures, and aid award rules related to enrollment intensity (Bettinger and Long, 2017). During the year of our experiment, the U.S. Department of Education implemented two nationwide changes on the FAFSA filing process. First, the early availability of FAFSA made it so that applications were available three months earlier during the year of our experiment than in previous years. Second, the "prior-prior year" mandate required all students to file the FAFSA using income tax information from two years ago, rather than from the previous year. The research attempts to better understand what format, frequency, or type of information should be supplied, and whether other types of supports must be provided to meaningfully influence decision making processes.

The paper on the results (Bettinger, Long, and Lee, 2020), concludes that interventions focused on support and information are still needed to help students even after the recent improvements to the FAFSA. Preliminary findings suggest our intervention increased FAFSA submissions by 3.8 percentage points and persistence in postsecondary enrollment by 2.1 percentage points. Stated another way, our intervention still had important effects even after incorporating recent efforts to improve the aid system—students still needed extra supports to help them complete the FAFSA.

### ***Lessons from Spring 2020: A FAFSA Season without Help***

The most recent experience of students attempting to navigate the higher education experience during the COVID-19 pandemic also underscores the need for additional reform to the FAFSA and financial aid system. During this past spring, FAFSA filings fell. According to the National College Attainment Network, the number of high school seniors who had completed the FAFSA through June 26 fell by 3.5 percent in comparison to the previous year. They also found that fewer than half of high school seniors in Florida completed the form (Field, 2020).

Students who needed to renew their FAFSA applications also experienced a decline. The total number of completed applications by returning students from low-income families (defined as having an income of \$25,000 or less) fell by 170,605 through June 30, the unofficial end of the financial aid season (June, 2020).

While additional analysis is necessary to fully understand the reason for the drop in FAFSA submissions, one leading hypothesis is that this is an indication of how reliant students are on supports to complete the FAFSA process. With the move to remote learning for most, many K-12 and higher education students lost access to counselors and teachers who could help them with this. Additionally, many of the non-profit organizations that would ordinarily be

available to provide support reduced their services. Therefore, one conclusion from this trend is that even with recent efforts to simplify the FAFSA, students are struggling with the complexity of the process and form. More is needed to support their college process.

### **ADDITIONAL WAYS TO IMPROVE THE FINANCIAL AID SYSTEM**

While more simplification of the FAFSA would be helpful in addressing students' needs, additional steps could be taken to improve the entire financial aid system and process.

#### ***The current need analysis calculation does not reflect accurately the financial situations of many college students.***

While the current financial aid system was created with the idea of determining the need of recent high school graduates who are dependent on their parents and attend college full-time, college students are a much more diverse group. Most would be considered “nontraditional,” meaning someone who fits at least one of the following criteria:

- Delays enrollment after high school
- Attends part-time
- Works full-time while enrolled
- Considered financially independent
- Has dependents other than a spouse
- Does not have a regular high school diploma (i.e., a GED or other certificate)
- Is a displaced workers or unemployed
- Is a welfare recipient
- Is an immigrant

Nearly three-fourths of all undergraduates are nontraditional. The nontraditional group includes working adults, parents, welfare recipients, immigrants, displaced workers and the unemployed, and single, financially independent students.

Given the disconnect between how the financial aid system was designed and the profile of many college students, many suggest that the current financial aid system does not adequately meet the needs of many, particularly nontraditional, students.

There are several major criticisms of the way federal need analysis is applied to nontraditional students. First, it is assumed that the earnings of the potential student are relatively minor (i.e., the result of a summer job) and should be taxed highly to cover college expenses. Moreover, the calculation assumes that the parents' income, the main source of support for the child, will continue even while the student is in college and should be used to help cover expenses. In contrast, independent students do not have other major sources of support to rely upon. Most nontraditional students are formally engaged in the labor market when applying for financial aid, and while the government assumes this income level will remain the same even after college enrollment, the nontraditional student is actually likely to experience a reduction in earnings while pursuing a degree. Therefore, assumptions about the amount of earnings available to them while in school are incorrect. As an extension of this, the EFC for many nontraditional students may be too high as they are penalized for their earnings the year before starting school.

#### ***Proactively disseminate clear information to families early and often.***

Proactively disseminating the information is my second recommendation. Additional effort must be taken to translate and circulate it to an audience that may understand little about higher education offerings, pricing, financial aid, or quality. Therefore, the federal government should actively reach out to potential students where they live, study, and work rather than

putting the responsibility on the individual to seek out the information on their own. This should be done through a series of partnerships with educational, social services, and employment organizations along with other government agencies. For instance, the government should work with college access programs and youth organizations to reach students.

One specific idea would be to send students and their families information about possible aid eligibility as early as elementary school. Using information from tax returns, an estimate could be made, and these reports could be similar to old Social Security projected benefits letters that working adults received. A related idea would be to summarize financial aid eligibility in a table with family income on one side and family size on the other. Research suggests those two variables give a very good estimate of aid eligibility (Dynarski and Scott-Clayton, 2006), and such simple, early information could help combat misperceptions about college costs and the availability of aid.

### ***Use and enable multiple pathways for families to complete the aid application process.***

As noted above, while there have been improvements to FAFSA on the Web, students without access to a private computer with high-speed internet access are not able to use the tool. Moreover, awareness of the FAFSA remains low. Therefore, I encourage maintaining the paper FAFSA as a submission method while also enabling community-based organizations, which help students and families complete the FAFSA free-of-charge, to submit batches of FAFSA once receiving consent from families. This would increase the opportunities for interacting with the form and help the many organizations working in the field to streamline their FAFSA assistance by interacting directly with the Department of Education (rather than having to take each individual family through the FAFSA on the Web or paper form). In my FAFSA project, having electronic submission directly from the tax site to the Department of Education reduced the amount of time and effort needed on both the part of the family and the tax professional.

### ***Minimize the burden on families when completing the FAFSA.***

The FAFSA is a significant barrier to accessing college financial aid, or even just determining eligibility level. The barrier is so large that even informing families of \$4,000 of grant eligibility was not enough to have them overcome the burden of navigating through the aid application process. Therefore, as much as possible, the process should limit the amount of work a family needs to do to complete the form.

Most importantly, we should eliminate steps that could be accomplished other ways. For instance, families should not be required to supply information available elsewhere. To some degree, this is the purpose of having IRS data populated into the FAFSA on the Web. However, another step forward would be to have this match happen behind the scenes automatically. As we have demonstrated, for most families, one could complete approximately two-thirds of the FAFSA using tax information. As a result, it took less than ten minutes to complete the rest of the form (Bettinger, *et al.*, 2012). If a family wanted to opt out of the system or question the validity of their matched data, they could do so, but for the vast majority of families, they would be able to skip a burdensome step, especially for those who are not able to use FAFSA on the Web. Information on family background and income is also available from other sources, including the Free and Reduced-Price Lunch system and other government programs, and these sources could also be used to determine family aid eligibility.

Making a shorter form (simplification) would likely increase FAFSA submissions. Moreover, such a change would make it easier to develop programs that could help families to fill out and submit the form. By streamlining the form and process, community-based organizations would be able to serve students more easily as fewer pieces of information would be required, and their outreach and assistance could be more effective.

We should also limit the number of interactions and steps needed to complete the FAFSA. In my research on the effects of simplifying the FAFSA process, we found the largest effects associated with individuals who used both simplification to complete the form and then took advantage of automatic filing or assistance in filing. These individuals for whom assistance and simplification were most prominent (and the FAFSA was completed in the office) appear to be the ones most affected by the treatment.

***Bolster the aid that is available to students.***

Unmet need and substantial loan burdens continue to be a problem in the United States. With the recession and increasing financial uncertainty prompted by the COVID-19 pandemic, the financial needs of students are only going to increase. In fact, many institutions have already experienced increases in requests for additional financial aid. To help students and invest in our future, it is critical that we increase the amount of financial aid available to low-income students.

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