

**Finishing FAFSA Simplification:  
What It Means for the Future of College Access & Completion**

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FULL COMMITTEE HEARING  
Time to Finish Fixing the FAFSA

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Note: The views expressed are those of the author and should not be attributed either to Teachers College, Columbia University; the Community College Research Center; or the National Bureau of Economic Research.

## **Biography**

Judith Scott-Clayton is Associate Professor of Economics and Education at Teachers College, Columbia University, where she teaches courses on the economics of education, labor economics and causal methods. She is also a Research Associate of the National Bureau of Economic Research, and a Senior Scholar at the Community College Research Center (CCRC). Scott-Clayton's research lies at the intersection of labor economics and higher education, with a particular focus on financial aid policy, community colleges, and post-college outcomes. Scott-Clayton's work crosses disciplinary boundaries and has been published in economics, education, and policy journals as well as in general-interest media including the Brookings Institution's *Evidence Speaks* series and the *New York Times*' Economix and Upshot blogs. Scott-Clayton has testified to the U.S. Senate three times previously as an expert on financial aid policy and research, and actively participates in higher education policy discussions at the state and federal level. Scott-Clayton holds a B.A. from Wellesley College and a Ph.D. in Public Policy from Harvard University.

## **Overview of Testimony**

### **1. The COVID-19 crisis heightens the critical role of federal student aid, as well as the urgent need to finish fixing the FAFSA.**

- Unemployment rates are expected to remain above pre-pandemic levels for the next decade, and nearly double pre-pandemic levels through 2022.
- College enrollment rates are expected to fall in 2020-21, but returns to college credentials remain near historically high levels. Enrollments are likely to rebound in subsequent years until the labor market fully recovers, but income and racial disparities may widen.
- FAFSA simplification is not a cure-all for underinvestment in higher education, but nor is it a diversion. It is a meaningful reform that matters for millions of low-income students.

### **2. A longstanding body of research suggests substantial benefits to simplifying the financial aid application process, and substantial costs to the status quo.**

- Financial aid can improve college enrollment, completion, and post-college outcomes, and evidence is strongest for programs with simple applications and eligibility rules.
- Only a few pieces of financial information are necessary to accurately estimate Pell eligibility, yet evidence continues to show that complexity of the FAFSA is a barrier to application, and the overall lack of transparency in the EFC and Pell formulas ultimately dilute the impact of aid for those students who need it most.
- Question 23 regarding prior drug convictions is a counterproductive deterrent to aid application that falls hardest on vulnerable populations we should be seeking to support.

### **3. Progress in recent years to improve the FAFSA has laid essential groundwork for transformative change – but urgency is needed to fully implement and build further upon these reforms.**

- The implementation of the IRS data retrieval tool, the switch to prior-prior year income, and additional steps authorized in the FUTURE Act are meaningful improvements for FAFSA applicants that make the remaining policy lift much lighter.
- Still, the aid application process remains highly opaque, and FAFSA applications have actually fallen since 2013, both overall and as a percent of overall college enrollments.
- The remaining steps to simplify not just the form, but the underlying formula and process may be the most consequential because they address transparency and predictability.
- The remaining objections to further simplification can be readily addressed.

### **4. Summary of key recommendations**

- Base Pell awards on a limited number of data elements that are available from the IRS so that eligibility is transparent and no separate financial application is needed.
- Continue to provide states and institutions with an eligibility index, as well as basic demographic and institutional information, to use in distributing other financial aid.
- Fix eligibility for several years, allowing students to securely plan for a multi-year course of study without the need to reapply.
- Summarize lifetime Pell eligibility by family income via a simple lookup table that schools, counselors, and community organizations can post and distribute.
- Use IRS information to proactively communicate to prospective students and their families about their likely Pell eligibility.

## **Full Testimony**

Chairman Alexander, Ranking Member Murray, and Members of the Committee:

My name is Judith Scott-Clayton. I am an Associate Professor of Economics and Education at Teachers College, Columbia University, as well as a Research Associate of the National Bureau of Economic Research and a Senior Scholar at the Community College Research Center. For more than a decade, I have conducted my own research on the impacts of financial aid policy, reviewed the evidence from others doing work in the field, and participated in policy working groups examining financial aid and other college access interventions at both the state and federal level.

In the following testimony, I draw upon a longstanding body of research. While I have made similar points in prior testimony to the committee, I place this body of knowledge in context of the current policy landscape, and I also incorporate new, recent findings from the literature. I first discuss the critical importance of federal student aid in the context of the ongoing COVID-19 crisis. I then focus on three questions: What does the latest evidence tell us regarding the likely benefits of financial aid simplification? Which aspects of simplification are the most important? And how can we address the remaining barriers to simplification?

Thank you for your committee's continuing bipartisan interest in this important topic, and for the opportunity to testify. I look forward to your questions.

### **I. The COVID-19 crisis heightens the critical role of federal student aid, as well as the urgent need to finish fixing the FAFSA.**

Well before the onset of the COVID-19 pandemic, troubling trends had emerged in higher education: while college enrollment has increased substantially since the passage of the Higher Education Act of 1965, gaps in enrollment between high and low income families are actually *greater* for recent cohorts than for those born in the early 1960s (Bailey & Dynarski, 2011). Racial disparities in college attainment have grown as well (Emmons & Ricketts, 2017).

These persistent college attainment gaps are troubling because the benefits of postsecondary education remain near historically high levels. Prior to the pandemic, full-time workers with a bachelor's degree were earning \$24,900 more annually than workers with only a high school diploma (Ma, Pender, & Welch, 2019). Those with a college education also have substantially higher employment rates, receive better employment benefits, are less likely to smoke, more likely to vote, and pay more in taxes (Ma, Pender, & Welch, 2019).

The COVID-19 pandemic has fallen especially hard on those without a college degree, and unfortunately is likely to exacerbate college attainment gaps even further. Unemployment among those with only a high school diploma is typically around twice as high as for those with a bachelor's degree, but the gap gets even bigger during recessions. In August 2020, for example, unemployment for those with only a high school degree was 9.8 percent compared to 5.6 percent for four-year graduates (versus 3.6 and 2.4 percent, respectively, in August 2019). The situation for Black, Hispanic, and low-income families is particularly dire as these groups not only

experience higher rates of job loss, but also higher rates of COVID-related illness and mortality than White, Asian, and higher-income families (Hardy & Logan, 2020; Gould & Wilson, 2020; Kinder & Ross, 2020).<sup>1</sup>

College enrollments typically rise when the labor market is weak, but this is no typical recession: colleges and students currently face the same or even greater barriers to normal operations as do employers and workers. As a result, enrollments for the current academic year are expected to fall by around 15% (American Council on Education, 2020). Even after the public health crisis abates, however, the economic damage is likely to linger for years. The Congressional Budget Office (2020) estimates that unemployment will be twice as high as before the pandemic through the end of 2022, and will remain above its pre-pandemic level for the next decade. The National Council of State Legislators (2020), citing survey data, predicts that COVID-related financial uncertainty – for both students and colleges – will be a long-term concern that could undermine enrollment and retention.

**Without significant additional federal investments in education, at all levels of schooling, the consequences of the COVID-19 pandemic may last for far more than a decade; the inequalities we see exacerbated today will be passed on to the next generation.**

When it comes to postsecondary education, the federal Pell Grant – the nation’s single largest grant program, used at over 6,300 eligible institutions nationwide, and providing up to \$6,345 per student per year for up to 6 years of undergraduate study – has never been more essential. Unfortunately, for too many prospective low-income students the Pell Grant – remains unknown and unclaimed, due to its opaque design and the unnecessarily burdensome Free Application for Federal Student Aid (FAFSA). One study estimated that students lose out on \$24 billion in financial aid annually due to failure to file the FAFSA (Kofoed, 2017).<sup>2</sup> The application may be especially challenging during the pandemic, as families juggle other urgent concerns.

**Fixing the FAFSA – so that Pell eligibility could be determined automatically, without a separate application, and awards could be fixed for several years without the need to reapply – will enhance the impact of federal student aid, and thus will provide a meaningful improvement in educational opportunity for low-income students.** Now more than ever, we must ensure that federal student aid lives up to its promise of ensuring that “the path of knowledge is open to all that have the determination to walk it.”<sup>3</sup>

## **II. A longstanding body of research suggests substantial benefits to simplifying the financial aid application process, and substantial costs to the status quo.**

Nearly forty years of research convincingly demonstrates that financial aid can influence college enrollment, persistence, and completion (see Page & Scott-Clayton, 2016, for a recent review). The latest research indicates that financial aid influences not just college enrollment and

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<sup>1</sup> Statistics retrieved from <https://fred.stlouisfed.org/release/tables?eid=48713&rid=50>.

<sup>2</sup> Estimated amount includes foregone Pell Grants as well as other aid dependent upon FAFSA application

<sup>3</sup> Lyndon Baines Johnson, “Remarks at Southwest Texas State College Upon Signing the Higher Education Act of 1965,” November 8, 1965. Archived online by Gerhard Peters and John T. Woolley, The American Presidency Project ([www.presidency.ucsb.edu/ws/?pid=27356](http://www.presidency.ucsb.edu/ws/?pid=27356)).

completion, but also important post-college outcomes like earnings and homeownership (Bettinger, Gurantz, Kawano, & Sacerdote, 2019; Scott-Clayton & Zafar, 2019; Denning, Marx, & Turner, 2019). The benefits of financial aid are shared by taxpayers as well: Denning, Marx, & Turner (2019) estimate that the costs of grant aid are fully recovered in the form of higher federal tax payments within ten years of college entry.

While financial aid clearly *can* influence college enrollment, this does not imply that every aid program is equally effective. Many of the studies that have found positive impacts of financial aid examined programs with simple, easy-to-understand eligibility rules and application procedures. In contrast, accessing federal financial aid requires students to submit a Free Application for Federal Student Aid (FAFSA), the complexity of which has been well-documented (Dynarski & Scott-Clayton 2006; Dynarski, Scott-Clayton & Wiederspan, 2013; Bill & Melinda Gates Foundation, 2015). With over 100 questions, the FAFSA is longer and more complicated than the 1040A and 1040EZ, the tax forms filed by a majority of taxpayers.

The original intent of all these questions is to more accurately target aid to those that need it most, but ironically the effect is the opposite. Most of the financial information collected on the FAFSA contributes very little to aid eligibility determination. **Pell eligibility and even the Expected Family Contribution (EFC) itself can be approximated with a high level of precision using just a handful of elements from the form, primarily relying upon adjusted gross income and family size** (Dynarski & Scott-Clayton, 2006, 2007; Dynarski, Scott-Clayton, & Wiederspan, 2013; Reuben, Gault, & Baum, 2015).<sup>4</sup>

The FAFSA isn't just an annoyance. Its complexity and lack of transparency make it harder to reach students who need aid most, undermining the effectiveness of aid. Many students never receive the federal aid for which they would qualify: of the 30 percent of undergraduates who fail to file a FAFSA, one-third would have qualified for a Pell Grant.<sup>5</sup> Some of those who do successfully file may submit the form too late to qualify for state and institutional aid they otherwise could have received (King, 2004). And even those who submit in one year may fail to reapply the next year, increasing the risk of dropout (Bird & Castleman, 2014).

Of even greater concern are those who never show up in college because they never knew they would qualify for aid, or weren't sure they could really count on it. Misperceptions about college costs and financial aid are widespread and are most prevalent among students from the lowest-income backgrounds (ACSFA, 2005; Grodsky & Jones, 2007; Horn, Chen, & Chapman 2003; Hoxby & Avery, 2013; Hoxby & Turner, 2013; Radford, 2013). **For lower-income and first-generation students who are particularly uncertain about their ability to afford college, when the time comes to file a FAFSA it may already be too late. College preparation needs to start well before the end of high school. But if students assume college is out of reach, they may never seek out the information that would challenge that assumption, and may not take the steps they need to take academically to be prepared.** Similarly, workers who

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<sup>4</sup> For example, when Dynarski and Scott-Clayton (2006) estimated Pell awards and EFCs for dependent students using only parental adjusted gross income, marital status, family size, and number in college, the correlation between estimated and actual Pell awards was 0.88 and the correlation between estimated and actual EFC was even higher at 0.91.

<sup>5</sup> Author's calculations based on data from the 2011–2012 National Postsecondary Student Aid Study (NPSAS).

have lost their jobs need to know that Pell Grants are available for them, otherwise they might not even consider the option of returning to school to retrain or upskill (Barr & Turner, 2015).

We don't have to speculate about the potential impact of simplification: rigorous research shows that reducing application hurdles can be a highly cost-effective strategy for reducing inequality in college access. In one study, researchers randomly selected a subset of low-income families who visited tax-preparation centers and were offered personal assistance with completing and submitting the FAFSA. The intervention increased immediate college entry rates by 8 percentage points (24 percent) for high school seniors and 1.5 percentage points (16 percent) for older participants with no prior college experience (Bettinger, Long, Oreopoulos, & Sanbonmatsu, 2012). After three years, participants in the full treatment group had accumulated significantly more time in college than the control group. Other studies document similar or even larger positive effects (up to 8-14 percentage point increases in enrollment or persistence) of providing students support to navigate paperwork, and reminding them about deadlines for financial aid application or renewal (Castleman, Page, & Schooley, 2014; Castleman & Page, 2016).

**Question 23 on the FAFSA, which asks about prior drug convictions and renders some applicants ineligible for federal student aid as a result, is yet another unnecessary barrier that keeps federal aid from reaching those who could benefit most.** Research indicates that this question does not do anything to deter drug use (Lovenheim & Owens, 2014), nor does it make campuses safer (Custer, 2016). Determining how to answer the question correctly may require filling out an additional, highly complicated worksheet. Out of the 18 million students facing this question annually, about 1,000 students are denied aid as a result (Kreighbaum, 2018). Thousands more may simply abandon the application altogether out of confusion and stress.<sup>6</sup> The question is particularly problematic given troubling racial disparities in drug arrests and convictions (Schanzenbach et al., 2016). It is also particularly counterproductive given that further education may be one of the best ways to promote successful re-entry, and reduce relapse and recidivism (see research review by Alliance for Excellent Education, 2013).

### **III. Progress in recent years to improve the FAFSA has laid essential groundwork for transformative change – but urgency is needed to fully implement and build further upon these reforms.**

To be effective, a simplification strategy needs to address at least two related but distinct problems. First is the burden of completing the application itself, which imposes compliance costs, stress, and may deter even some applicants who intend to apply. Second is the overall lack of transparency which makes aid eligibility difficult to predict, communicate, and rely upon (ACSFA, 2005; Dynarski & Scott-Clayton, 2007). **Thus, in evaluating “how much simplification is enough,” the critical criteria should be: does the reform both *substantially reduce application hassle and substantially improve transparency and predictability?***

Efforts to simplify the FAFSA have a long history. In 1986, Congress introduced a “simplified needs test” so that some families could omit asset information from the form, and in 1992

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<sup>6</sup> A study of college application attrition at the State University of New York found that for every one student who was denied admission as the result of prior criminal history, fifteen abandoned the application entirely (Rosenthal et al., 2015).

Congress introduced the “automatic-zero EFC” for families with incomes below a cutoff amount. More recently, a mobile-friendly form was introduced, some questions have been eliminated, and the “skip-logic” has been improved in the online application so that students don’t have to answer questions that aren’t relevant to their circumstance. Two particularly helpful changes are that students can now automatically import tax information from the IRS via the IRS Data Retrieval Tool (DRT), and because the formula now uses prior-prior year tax information, students can apply several months earlier than they could before. The FUTURE Act, passed in 2019, makes additional important strides by authorizing the Internal Revenue Service to directly share taxpayer information with the Department of Education.

**These changes are important, and help reduce the application burden.** They will also help reduce the need for costly FAFSA verifications, which costs institutions an estimated \$500 million per year, representing 15-22% of typical financial aid office operating budgets (Guzman-Alvarez & Page, 2020). Research indicates that the verification process on its own may reduce enrollment of Pell-eligible students by 2 to 3 percentage points (Wiederspan, 2019).

Still, many of the most complicated questions remain, such as questions about untaxed income, the value of investments, and drug convictions. And because students are advised to assemble their documents and even to fill out a paper “worksheet” prior to beginning the online form, it is not clear that these reforms necessarily eliminate all the time and hassle required.<sup>7</sup> One recent study of the auto-zero EFC concludes that this “behind the scenes” simplification on its own likely has little or no effect on college enrollments (Matsudaira, 2018). Other studies have found that information on aid eligibility alone is not enough to generate meaningful changes in enrollment (Bettinger et al., 2012; Bergman, Denning, & Manoli, 2019).

**While the form is getting easier and moving earlier, the eligibility formula remains opaque and unpredictable, so it remains difficult for students and families to discern their likely eligibility well in advance of application, or to have much confidence they can count on the award over time.** This uncertainty and lack of transparency matters: one recent randomized study found that providing early outreach, clear communication, and a multi-year aid guarantee dramatically increased matriculation rates even though the program simply re-packaged aid for which students would have qualified anyway (Dynarski et al., 2018).

Concerningly, FAFSA submissions have actually declined noticeably since 2013, both overall and as a percentage of college enrollees.<sup>8</sup> The reasons for this decline are not entirely clear, but the trend suggests that reforms are still needed. To finish fixing the FAFSA, we need to not only dramatically reduce application hassle, but also to dramatically increase transparency and certainty around financial aid. Under the current system, describing how the EFC is calculated, and how Pell Grant awards are calculated from that, is very difficult to explain in simple terms,

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<sup>7</sup> See, for example, this blog post from the U.S. Department of Education, “7 Things You Need Before You Fill Out the 2018–19 FAFSA® Form,” which doesn’t mention the auto-zero or simplified needs test. It does mention the IRS-DRT, but notes that since not everyone will be able to use it, applicants should still have their tax forms available for reference (<https://blog.ed.gov/2017/09/7-things-need-fill-2018-19-fafsa-form/>).

<sup>8</sup> In 2013-14, 21.2 million FAFSAs were submitted (equivalent to 79% of 12-month headcounts), compared to 18.1 million for the 2019-20 school year (70% of 12-month headcounts).



and students have to reapply every year.<sup>9</sup> While many calculators and estimators are available online, the students most in need of assistance may not even know these exist, let alone go looking for them in the 9<sup>th</sup> grade. The opacity of Pell eligibility may be one reason why the program lacks the name recognition of the simpler, highly-advertised aid programs now in place in many states, like the Tennessee Promise.

To promote early awareness of Pell eligibility will require clear communication tools and proactive outreach, both of which would be much easier with a more transparent formula. How could this be done? **Since the main determinants of Title IV aid eligibility are already collected via the IRS Form 1040, some (including myself) have proposed simplifying the Pell formula, eliminating the FAFSA completely and instead determining eligibility automatically, using income and other data from tax forms.** Various teams have articulated how a simplified formula could work (including the bipartisan Financial Aid Simplicity and Transparency [FAST] Act introduced by Senators Alexander and Bennet in 2014; as well as proposals by The Institute for College Access and Success, 2007; Dynarski & Scott-Clayton, 2007; Baum & Scott-Clayton, 2013; Bill & Melinda Gates Foundation, 2015; Rueben, Gault, & Baum, 2015). Beyond reducing application hassle, simplifying the Pell eligibility formula to the point it could be expressed in a simple lookup table would substantially improve transparency.

In the debate around various simplification proposals, two concerns are commonly raised. One is that if the formula doesn't include asset information, then wealthy families with low incomes will claim aid that they don't really need. But surprisingly, although the FAFSA questions about net worth are arguably among the most challenging to answer, the answer is basically ignored for the vast majority of applicants. Why? Retirement accounts and home equity are excluded, and this is where most families hold their assets. Other assets are considered only if they fall above a threshold that rises with the age of the oldest parent.<sup>10</sup> Dynarski and Scott-Clayton (2006) found that assets had no effect on Pell eligibility for 99 percent of dependent applicants and no effect on EFC for 85 percent of dependent applicants. Asset information likely matters even less for independent students.

A second common concern is that while simplified formula might work fine for federal aid, states and institutions may need more detailed information for their own programs. By far the most common financial element used for state aid eligibility is the EFC—which is explicitly preserved under some simplification proposals, and could be easily estimated under others. As discussed above, EFCs can be closely approximated using only a fraction of the information currently collected on the FAFSA. Baum, Little, Ma, and Sturtevant (2012) show that these minor changes in EFC have only small effects on the distribution of state aid. While the specific effects may vary from state to state, data on current applicants could be used to predict state-specific effects so that states have time to make any necessary adjustments.

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<sup>9</sup> The document that outlines the 2020-21 EFC formula is 36 pages long, and the Federal Student Aid Application and Verification Guide that explains the FAFSA process for financial aid professionals is currently 140 pages long.

<sup>10</sup> This threshold was reduced in recent years, e.g. from \$25,400 in 2018 to \$7,100 in 2020 for a two-parent dependent student in which the elder parent was age 55. The median net worth of households with children age 18 or younger, excluding home equity but *including* retirement accounts, is \$14,993 (U.S. Census Bureau, Survey of Income and Program Participation, 2014 Panel, Wave 1). On average, retirement savings represent about 40 percent of remaining assets, suggesting the median net worth excluding both home equity and retirement savings could be well under \$10,000.

Adjusted gross income is another element that could easily be preserved and passed to states under even the most radical proposals for simplification. Finally, if aid eligibility were determined automatically via the tax system, information on demographics, institutions, and application date could easily be collected via a supplementary non-financial form. Once students know what they qualify for, they may be much more likely to fill out a simple form that doesn't require complex information on income and assets.

Institutional aid presents a somewhat different challenge. Changes in EFC that have little implication for federal or state need-based aid may matter more for institutional aid that often extends to much higher-income households. However, schools with substantial institutional aid typically *already* use an additional financial aid form, the CSS Profile, and would continue to do so even if the FAFSA were dramatically simplified. The federal aid process need not burden all applicants with questions required for only a fraction of institutions.

#### **IV. Summary of key recommendations**

A low-income student today can qualify for up to \$38,070 in lifetime Pell Grant aid, over the course of their studies. But too many give up on college before they start, or drop out before they finish, because of complexity and a lack of transparency in the aid application process.

In recent years, important reforms have been made that lay the foundation for further simplification. My key recommendations to finish fixing the FAFSA are to:

- Base Pell awards on a limited number of data elements that are available from the IRS so that eligibility is transparent and no separate financial application is needed.
- Continue to provide states and institutions with an index of eligibility, as well as basic demographic and institutional information, to use in distributing other financial aid.
- Fix eligibility for several years, allowing students to securely plan for a multi-year course of study without the need to reapply.
- Summarize Pell eligibility by family income in a lookup table – even if some fine print is required – that schools, counselors, and community organizations can post and distribute.
- Use IRS information to proactively communicate to prospective students and their families about their Pell eligibility.

Figuring out the FAFSA is a major hurdle in the process of applying for college, but it is hardly the only one. If federal policymakers can simplify the cost calculus for students and their families, it could free up the time and effort of thousands of counselors, aid administrators, college advisors, and volunteers nationwide that are currently devoted to helping students fill out FAFSAs. Instead, these critical human resources could be redirected to helping students identify a high-quality college option that not only fits their budget, but furthers their educational aspirations. And students themselves could worry a little less about this form, and a little more about everything else they need to do to prepare for, persist, and succeed in college.

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