State Council of Higher Education for Virginia

2020 Update: Review of Financial Aid Formulas and Awarding Practices

SCHEV

November 1, 2020

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BACKGROUND AND STUDY MANDATE

The Commonwealth of Virginia provides more than $220 million annually to fund the Commonwealth Award and Virginia Guaranteed Assistance Program (VGAP). These two need-based financial aid programs address affordability and access for in-state undergraduates attending public institutions. As higher education costs continue to increase and the Commonwealth expects the demand for workers with degrees or credentials to grow, it is imperative that state financial aid programs function efficiently and effectively.

Tuition revenue used for financial aid is another important tool that addresses student affordability and access and helps institutions meet enrollment goals. This program redirects a portion of tuition revenue paid by students in order to create grants and scholarships. Legislators have expressed concern about the rapid expansion of this non-general fund program over the past 10 to 15 years.

As a result, the 2019 session of the Virginia General Assembly charged the Council to undertake a review of the Commonwealth's primary state financial aid programs. On November 1, 2019, SCHEV released the **Review of Financial Aid Funding Formulas and Awarding Practices**. SCHEV also proposed to further develop the recommendations and draft associated legislative amendments. The 2020 session authorized this follow-up review as follows:

2020 Act of Assembly, Chapter 1289, Item 152:

> *O 1. The State Council of Higher Education for Virginia, in consultation with staff from the House Appropriations and Senate Finance and Appropriations Committee, Department of Planning and Budget, Secretary of Finance and Secretary of Education, as well as representatives of public higher education institutions, shall review financial aid awarding practices and tuition discounting strategies.*
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> *2. The Council shall review current state financial aid awarding policies and make recommendations to: (1) appropriately prioritize and address affordability for low- and middle-income students; (2) increase program efficiency and effectiveness in meeting state goals that align with The Virginia Plan; and (3) simplify communication and improve student understanding of eligibility criteria. The review shall also: (1) assess financial aid by income level and the utilization and reporting of tuition revenue used for financial aid and unfunded scholarships; and (2) consider the pros and cons of*

> *authorizing remittance of tuition and fees for merit scholarships for students of high academic achievement.*
>
> *3. By November 1, 2020, the Council shall submit a report and any related recommendations to the Governor and the Chairs of the House Appropriations and Senate Finance and Appropriations Committees.*

The onset of the 2020 pandemic resulted in time constraints and communication challenges for all personnel involved in this report and prevented SCHEV from completing a set of legislative proposals. Staff continued its work with institution representatives and this report updates the recommendations and proposes that in 2021, staff expand its work with legislative representatives and their staff and advocates to implement legislative changes for consideration during the 2022 General Assembly session.

FUNDING STATE FINANCIAL AID PROGRAMS

By setting appropriate parameters under which financial aid is funded, the Commonwealth can make a strong statement in support of access, affordability and equity. In the 2019 financial aid study, SCHEV developed several recommendations to improve the appropriation and allocation of state financial assistance to individual institutions. This included the development of a new financial aid funding model that was used to allocate funding for the first time during the 2020 General Assembly session.

SCHEV will continue to monitor and review the new funding model to ensure affordability and equity. Staff also will begin developing appropriate benchmarks and goals to guide future funding recommendations. The next section summarizes and updates the recommendations that pertain to the new state funding model.

1.1 Improve the accuracy of the model by using a student's actual EFC.

For decades, recommendations for allocating financial aid funding to the institutions were based on variations of "remaining need" calculations that included the family's current financial strength and estimated ability to pay for college. These calculations relied on the Cost of Attendance (COA)--estimated costs for tuition and fees and allowances for room and board, books and supplies, transportation, and personal expenses for each student and subtracted the federally calculated Expected Family Contribution (EFC). The higher the EFC, the less "need" a student demonstrated; the lower the EFC, the more "need" a student demonstrated.

The new funding model corrected a long-standing assumption that every student could contribute towards their education by working over the summer. A minimum EFC (varying between $700 and $1,200, based on the type of student) was imposed on the student data to reflect this expectation.

This method undercounted student need system-wide by more than $30 million with a disproportionate impact on institutions serving a large number of low-income students. The new funding model no longer adjusts the EFC as determined by federal methodology.

1.2 Minimize impact of higher tuition costs on financial aid allocations.

The COA varies greatly between institutions and the primary difference is the tuition charged by institutions. As a result, institutions charging higher tuition can demonstrate larger amounts of financial need despite enrolling fewer low-income students and having more financial aid dollars to award. The new model restricts the tuition component of the need calculation to the lesser of the actual tuition charges and the average tuition across all institutions in the same sector.

1.3 Allocate funds based on both cost and enrollment of low- and middle-income students.

Previous funding models for allocating aid to institutions funded a percentage of the remaining need calculation. Under this method, the goal was to meet a comparable percentage of need among the institutions; however, this ignored the fact that some institutions start with much lower average remaining need.

The new funding methodology identifies the per-student average remaining need and directs funds to those institutions with the highest averages. This prioritizes state funding for those institutions serving larger numbers of low-income students.

ADMINISTRATION OF STATE FINANCIAL AID PROGRAMS

The administration of state financial aid has remained largely unchanged since 1992 when the Virginia Guaranteed Assistance Program (VGAP) was introduced. Since its creation, the Commonwealth has had two "primary" need-based aid programs with similar purposes. These programs are decentralized as the state government sets the basic rules of administration while providing institutions limited discretion in addressing the unique needs of their respective student bodies.

The recommendations in the 2019 review were intended to improve access, affordability and equity as well as student understanding and institution administration of state need-based assistance. An update on the recommendations to improve the administration of state financial aid programs follows.

2.1 Combine the two financial aid programs into a single program.

Updated recommendation: SCHEV recommends merging the two primary state programs to include implementing a bonus award for students meeting progression requirements

The Commonwealth Award was implemented as "discretionary aid" in the 1970s. The Virginia Guaranteed Assistance Program (VGAP) was created in 1992 to encourage high-school-student preparation for higher education. The program was never fully funded and so has not fulfilled its original vision of providing assurance—"Guaranteed Assistance"—of affordability for those who meet the requirements.

As a result, VGAP has become an extension of the Commonwealth Award. VGAP provides larger awards to students who maintain a 2.0 minimum college grade point average, continue to demonstrate financial need, maintain satisfactory academic progress and maintain continuous full-time enrollment. Students not meeting these requirements lose eligibility for the program.

The progression and completion role for VGAP was further enhanced in 2018 when legislators required that the VGAP award be larger for students in higher class levels and that students only receive one year of award per class level. For example, a Sophomore student would receive a larger VGAP award than a Freshman with equivalent need and after receiving the award for one year the student must have achieved Junior status to continue to receive VGAP for another year.

Due to the program's renewal requirements, students are at risk of permanently losing eligibility for VGAP; therefore, students must focus on "not losing VGAP eligibility." Institutions report that students are not always aware of these requirements and that the manual tracking required to verify continued VGAP eligibility, especially when students advance a class level mid-year, takes additional time and resources.

Simplifying the state financial aid processes and increasing student understanding would support the goals of the Virginia Plan, the Commonwealth's strategic plan for higher education. During the 2019 review, staff discussed the possibility of merging the two programs to reduce their complexity and make them easier for students to understand. Instead of focusing on "not losing VGAP," students could instead focus on "earning a bonus."

As envisioned, VGAP would be eliminated but its progression incentives retained by incorporating them into the current Commonwealth Award. Students would only need to continue to demonstrate financial need and satisfactory academic progress to be considered for a state need-based Commonwealth Award.

Students earning at least 30 credit hours within a year would earn a "bonus" award for the following year. This bonus would be restricted to no more than four years of use and be listed separately on the student's account so that students have a tangible reminder of the reward for their efforts. In this way, every student demonstrating need has the opportunity to "earn" the bonus annually and no student "loses" that opportunity. The program becomes more of an incentive and less punitive.

Staff has worked with state financial directors on the details of how this new merged program would operate. These details will inform the drafting of the legislative authorization needed to complete the initiative to propose to the General Assembly for the 2022 session and staff will continue to refine the proposed language in the coming year.

SCHEV staff recommends merging the Commonwealth Award and VGAP by:

1) Repealing of the statutory authorization for VGAP, §§ 23.1-636-638.
2) Replacing VGAP with a bonus award for those meeting progression standards. The bonus would be based on earning at least 30 credit hours within an academic year and be limited to no more than four years.

3) Requiring that the bonus award be larger for students in a higher class level.

2.2 Adjust the minimum award requirements.

Updated recommendation: SCHEV recommends that the minimum award requirements recognize receipt of federal grants.

State law requires that the neediest students, as defined by the institutions, "be guaranteed an award at least equal to tuition." This policy ensures that those students are able to cover tuition charges; however, institutions must exercise caution in how the neediest student is defined or the available funds will be quickly exhausted with little remaining for others with significant need. To avoid this, many institutions have defined the neediest student very narrowly so that few students meet the definition.

SCHEV recommends that the minimum award requirements be adjusted to read as follows: "be guaranteed a combination of federal and state grants at least equal to tuition." This proposal provides additional flexibility in awarding practices and 1) assures that the neediest students can cover tuition costs, 2) permits institutional and private grants and scholarships to cover other costs and 3) enables limited state financial aid dollars to be distributed to a broader range of students. The policy would not prohibit institutions from providing larger awards if sufficient funding is available.

2.3 Restrict aid only to low- and middle-income students.

Updated recommendation: SCHEV recommends that eligibility for state need-based aid be capped at the federally calculated Expected Family Contribution of $15,000.

State law requires that VSFAP funds be awarded based on need as defined by Council. In regulations, Council requires that the institutions use remaining need, which is defined as the Cost of Attendance (COA) less the Expected Family Contribution less any known gift aid. Further, state law requires that awards be proportional to need, meaning that students with more need receive larger state awards than students with less need. While this ensures that state aid is primarily available to low- and middle-income students, many higher income families also demonstrate need since the COA often exceeds $25,000.

For state financial aid purposes, the definition of low-, middle-, and high-income students is based on a percentage of the federal poverty level (FPL). Low-income students are defined as those whose families have income between 0-200% of the FPL, middle-income for families having income between 200-400% of the FPL, and high-income for families having income above 400% of the FPL. Applying the percentages to a family of four in 2020, low-income students are those whose families earned up to $52,400, middle-income students' families earned between $52,401 and $104,800, and high-income are those whose families earned more than $104,800. Increasing or decreasing the family size will result in raising or lowering the income level accordingly, as seen in the chart below.

2020 Federal Poverty Level (FPL) Guidelines

Persons in Household	Household Income			
	Low Income		Middle-Income	
	100%	200%	300%	400%
1	$12,760	$25,520	$38,280	$51,040
2	$17,240	$34,480	$51,720	$68,960
3	$21,720	$43,440	$65,160	$86,880
4	$26,200	$52,400	$78,600	$104,800
5	$30,680	$61,360	$92,040	$122,720
6	$35,160	$70,320	$105,480	$140,640
7	$39,640	$79,280	$118,920	$158,560
8	$44,120	$88,240	$132,360	$176,480

Derived from: https://aspe.hhs.gov/poverty-guidelines

During the 2019 review, staff discovered that the four-year institutions awarded just under $12 million, or 7.8% of total funds awarded, to students from high-income families. The average awards were relatively small in comparison to students from low-income families ($647 compared to $2,688). Two-year colleges also provided awards to high-income families, accounting for 2.2% of the total funds.

Definitions of income levels and the impact on a family can vary. FPL is but one measure as median, quartiles, and quintiles can also be used. In a 2015 report, Pew Research defined middle-income for a family of three as between two-thirds and double the national median ($42,000 to $126,000 in 2014 dollars). Also, income does not take into account the relative cost of living in various jurisdictions across the country or the state. A family making $40,000 a year in southwest Virginia may find themselves in a stronger financial position than a family making $50,000 a year in northern Virginia. Finally, multi-child families may find that their ability to cover college costs is significantly impacted if more than one child is in college at the same time—sometimes cutting their EFC approximately in half.

The review demonstrated that high-income students receiving a state award at the four-year institutions had an average unmet need (the final calculation of need after COA less EFC, all forms of gift aid and state aid have been awarded) of $6,158. Meanwhile, low-income and middle-income recipients demonstrated unmet need of $12,378 and $11,118, respectively. At two-year colleges, the average unmet need for high-income students was $1,386, with low- and middle-income students averaging $7,318 and $4,944, respectively.

Even though the awards were comparatively smaller and offered to fewer students, the difference in unmet need between high-income students and other students receiving aid is significant. While these high-income students can demonstrate need, state financial aid dollars are best spent on those facing larger financial barriers to higher education. By awarding these dollars to low- and middle-income students, the Commonwealth's financial aid programs can better support the Virginia Plan and state completion goals. While FPL goals are useful for reporting purposes, the calculated EFC provides a superior evaluation of ability to pay, especially for families with multiple students in college.

For these reasons and after consulting with the institutions' financial aid offices, SCHEV recommends that state need-based aid not be available to students with an EFC in excess of $15,000. This number is often associated with families making well over $100,000 whose average remaining need is half that of low- and middle-income students. Among four-year institutions, this change will make approximately $5 million available to students in the lower two income categories.

2.4 Restructure the progression incentives designed to encourage student progression to graduation.

Updated recommendation: SCHEV recommends that the progression incentive be changed to require completion of at least 30 credit hours per year.

As mentioned in recommendation 2.1, the progression and completion role for VGAP was enhanced in 2018 when legislators required that the VGAP award be larger for students in higher class levels and that students only receive one year of award per class level. Under existing legislation, students not advancing a class level within a standard award year would not be eligible for VGAP in the following fall term. Many of these students will accumulate the necessary course credits to advance class level upon completion of the following fall term; however, state assistance is typically severely limited or even exhausted going into the spring term.

As a result, students regaining VGAP eligibility in the spring term will not receive a VGAP award or may receive a smaller VGAP award than that of other students in the same class level. Those students advancing a class level mid-year are often stuck in this off-cycle (advancing class level mid-year) VGAP awarding for several years, resulting in annual under-awarding. Finally, based on institutional feedback, the process of identifying these off-cycle students is often a highly manual exercise for limited staff resources.

SCHEV recommends that the progression incentive be altered to recognize students completing at least 30 credit hours per year, which is the minimum required in order to graduate within the expected four-year period. The accepted methods of completing the 30 hours include summer courses, testing out, awarding of life-experience credits, etc.

Under the proposed merger of programs, students who earn 30 credit hours within one year would receive a "bonus" award the following year. Freshman students transferring in 30 or more credit hours due to dual-enrollment or testing out of courses would also earn the bonus.

2.5 Provide institutions with additional award flexibility while maintaining accountability in prioritizing low- and middle-income students and families.

Updated recommendation: SCHEV recommends providing institutional flexibility in using a student's EFC as a basis for awarding state aid.

Virginia Student Financial Assistance Program (VSFAP) awards are based on remaining need, as defined by Council, which is COA less EFC less known gift aid at the time the institution determines the individual student awards. The policy is effective in assessing each student's ability to pay for education using a combination of family resources and the accumulation of federal, institutional and private grants and scholarships. The institution can use this policy to ensure that minimum levels of support are achieved and that the financially neediest students receive larger state awards. This can be referred to as a "last dollar" type of program and ensures the greatest level of efficacy of the use of state funds.

The definition of remaining need does have its drawbacks:

1) The policy can be seen as "penalizing" a student who has successfully accumulated outside grants and scholarships as the VSFAP award is subject to being reduced by the receipt of these awards.

2) The policy makes the state award far less predictable as the many variables that determine an award are unlikely to be duplicated the following year.

3) The policy complicates the award schedule and software used to determine individual student awards because it uses a number of data components.

4) Finally, the award acts as a "last dollar" program which can conflict with the goals and requirements of other financial aid programs.

Several institutions have sufficient institutional resources that enable students from all economic backgrounds to enroll. Some of these institutions have indicated an interest in basing awards solely on EFC, which would improve award forecasting and predictability. Other institutions have fewer financial resources available and need to fully consider all student grants and scholarships before awarding limited state financial aid dollars.

To enable each institution to create an awarding strategy that best fits the needs of its student demographics, staff recommends providing institutions with the flexibility to use a student's EFC as a basis for awarding, rather than a remaining need calculation. This flexibility will enable some institutions to simplify their awarding practices while still preserving the need for other institutions to consider all available student resources. Under the proposal, an institution could base an award on EFC only, on COA less EFC or retain a variation of the current definition, which is COA less EFC less known need-based gift aid.

TUITION REVENUE FOR AID AND UNFUNDED SCHOLARSHIPS

While the Commonwealth Award and VGAP provide state funded need-based aid to students, the state also authorizes institutional discretion in providing additional grants and scholarships using tuition revenue.

The tuition revenue for financial aid strategy and Unfunded Scholarships are functionally similar as both programs lower the cost of education for students while reducing funding available for general operating costs. In 2014, SCHEV explored the relationship between the two programs. Each program has its own authorization and rules for determining student awards.

Tuition revenue for aid is authorized in the budget bill as program 108, "non-general" funds used for student financial assistance. Through this program, institutions increase tuition charges in order to raise funds ("redirected tuition revenue") for grants and scholarships. Section 4-5.01b of the budget bill provides general state guidance in making awards to students.

Unfunded Scholarships has been authorized by the Code of Virginia since 1919. This program recognizes no source of funding for its scholarships and represents "foregone tuition revenue" for the institution. The Code of Virginia § 23.1-612 provides a very detailed structure for making these student awards.

In the 2019 report, the Council made several recommendations regarding the use of these two programs. The following is an update on those recommendations.

3.1 Continue to monitor tuition revenue used for aid as reported annually in the six-year plan process to allow reviewers to assess and provide feedback regarding an increase in the percentage.

Updated recommendation: SCHEV will produce enhanced annual reports to better track program usage.

As usage of tuition revenue for aid increased during the last 15 years, policy-makers became concerned about the impact on students with some institutions reporting double-digit increases in tuition charges to support student financial assistance.

Through the regular six-year plan process, staff collects the percent of an institution's tuition revenue directed to student awards. Annual meetings among state policymakers then provide an opportunity to review and discuss any increase or trend in the program's usage.

Staff will report data and trends from the Unfunded Scholarships program and the tuition revenue for aid program so that policy-makers can better understand their impacts on institutional operating budgets and tuition charges.

3.2 Improve transparency by publicly reporting the amount of tuition revenue being used for financial aid.

Updated recommendation: SCHEV recommends use of institutional web presence to improve transparency.

In the last decade, legislators have placed greater emphasis on transparency. For example, institutions must list non-E&G fees individually, advertise and permit public comment at meetings to approve tuition increases and make data on student loan debt available on a consumer information webpage. Similarly, the use of tuition revenue for financial aid should be transparent.

Staff will work with institutional and legislative staff to develop consistent reporting expectations for these two programs, such as recommending institutions to report policies for using tuition for financial aid on their consumer information webpage. The webpage should include a statement that in-state students are not supporting out-of-state students and may list by degree level and in/out-of-state status the approximate amounts and percentage of total tuition revenue that is contributed by students and the approximate amounts and percentage of total tuition revenue that is awarded to students who receive aid.

3.3 Authorize institutions to use a portion of tuition revenue to fund emergency awards for low-income students facing unexpected expenses that threaten their continued enrollment.

Updated recommendation: SCHEV recommends continued exploration of appropriate state action for students in need of emergency assistance.

The need for and creation of student emergency assistance funds has received increasing attention across the country. Students able to meet the direct financial cost of attending a college may be just a car repair or medical expense away from having to withdraw. A flexible emergency fund providing one-time micro-grants may prove the difference in retaining these students.

Identifying a source of funding is a primary obstacle to setting up emergency assistance programs. Tuition revenue for aid currently cannot be used for emergency assistance. If authorized to use this program, the institutions could develop programs that fit their students' needs.

Statewide, questions exist regarding the use of tuition revenue to cover these non-education expenses, including concerns about the appropriateness of this policy and the degree to which fellow students should contribute to this program through increased tuition charges. In contrast, there is a great deal of appeal in providing a reserve of funds that may make the difference between a student continuing their education or having to drop out.

Staff has surveyed the institutions and of those responding, approximately three-fourths of the four-year public institutions and 90 percent of the community colleges currently provide emergency assistance grants. The programs are generally small, usually less than $25,000 total, and funding primarily comes from donations or other private sources. Awards are made for medical expenses, auto repair, utilities, catastrophes (fire, flood, etc.) and food. In many cases, awards are paid directly to the business or organization, not to the student.

Given the recognized value of this kind of program but no consensus on how to finance it, staff will continue to study this topic and consider options such as state funding, food pantries, short term loans, or directing students to private, local and state organizations that provide assistance to those in need.

3.4 Combine the existing Unfunded Scholarships Program (§23.1-612) with the policies pertaining to using tuition revenue for financial aid.

Updated recommendation: SCHEV does not recommend merging the two programs at this time.

During the 2019 review, SCHEV recommended that a merger of the tuition revenue for aid and Unfunded Scholarships programs be considered to improve reporting and accountability. Staff has examined the two programs and determined that although the programs' fiscal impact on institutions is similar, there is a distinct difference in how they are used. Merging the programs could create unintended consequences and negatively affect the programs' budgets and their effectiveness in meeting the institutions' diverse goals and needs in providing assistance to students.

Despite the similar impact on the institutions' operating budgets, these two programs have very different budgeting strategies. Also, the Unfunded Scholarships program provides flexibility that is not available with the tuition revenue for aid program. The Unfunded Scholarships program not only offers scholarships but also provides awards for graduate students employed as teaching, graduate and research assistants. For these reasons, staff recommends that the merger of the two programs be tabled for the immediate future in favor of increased reporting and transparency.

In 2021, SCHEV will continue to review tuition revenue for aid and the charge from the General Assembly to "consider the pros and cons of authorizing remittance of tuition and fees for merit scholarships for students of high academic achievement."

COLLEGE ACCESS AND AFFORDABILITY

The final four recommendations largely represent principles and aspirations that will guide affordability and access initiatives considered by SCHEV.

4.1 Support existing college access programs.

The Commonwealth of Virginia has a vested interest in ensuring that higher education is both accessible and affordable. While the state can initiate change at the systemic level, SCHEV recognizes the value of working with college access organizations that work directly with students. SCHEV maintains a strong relationship with the Virginia College Access Network, an association of high school counselors, volunteers and community-based non-profit professionals who work directly with high school students.

SCHEV partners with ECMC (a foundation) to coordinate a series of informational events and resources to help Virginia students and families through the college preparation process. The 1-2-3 Go! Campaign includes College Nights in Virginia, Virginia College Application Week, Super FAFSA Project and Decision Day. From 1) finding the best fit, to 2) meeting application deadlines, to 3) figuring out how to pay for it all, and finally deciding where to attend, SCHEV, ECMC and local school divisions help families navigate the college-going process.

To support college access programs, SCHEV recommended a $1.5 million to support the Guided Pathways to Success (GPS) initiative during the 2020 session. The goal of the program is to provide access providers and students with tools to help navigate the college preparation and enrollment processes so students can find the right college "fit." This will help prevent student drop/stop outs and reduce time to degree. The General Assembly provided $250,000 in its regular session conference report, but the funds were later unalloted due to the COVID pandemic. SCHEV will continue to support college access programs and will seek a reallocation of these funds in the upcoming session.

4.2 Create online resources to help students better understand higher education finances.

While the state can affect the cost of education and provide financial assistance to those in need, the availability of clear and understandable information is critical as students decide which educational path provides the best financial fit. SCHEV will continue to evaluate its on-line presence to ensure that the correct data is available in the right format to help students make better-informed choices. The recently expanded 1-2-3 GO! Initiative and the pending development of a student loan education course are examples of on-going efforts to help students better grasp the fundamentals of financing higher education.

4.3 Support Free Application for Federal Student Aid (FAFSA) completion programs.

College affordability is a well-known barrier to entering college and completing a degree. Studies suggest that many current students, financially struggling to remain enrolled, may be eligible for but not receiving federal or state financial assistance. These students are unaware of the availability of student financial aid because they have not completed the FAFSA.

Additionally, studies have shown that students completing the FAFSA are more likely to enroll in college. While this may be an example of a self-selecting statistic, there is a legitimate belief that if a student were aware of the availability of financial aid, the student might see college as within their reach and begin to explore options. Whether making college more affordable for enrolled students or igniting interest in college for those who think higher education is out of reach, FAFSA completions can play an important role in helping the Commonwealth reach its affordability, completion and equity goals.

For SCHEV, FAFSA completion is an important strategy that supports access, affordability and equity. The agency is active in the following projects: 1) participating in the Super FAFSA Project, a statewide initiative designed to increase FAFSA completion throughout the Commonwealth with a special focus on low-income serving schools; 2) joining the FAFSA completion initiative that enables local high schools to identify those seniors who have not yet completed the FAFSA; 3) encouraging the addition of FAFSA information into high school financial literacy curriculums; and 4) working with policymakers to develop more ways to increase FAFSA awareness and completions.

4.4 Connect eligible students with other social services.

As previously mentioned, finance is a principal barrier to accessing higher education. The cost of attendance calculation takes into account many of the expenses incurred by a college student, and those expenses can be addressed as part of financial aid policies. However, students from families who live below the poverty level may have difficulty covering basic living expenses. SCHEV is considering how to better connect the most vulnerable students with existing community resources, such as the federal Supplemental Nutrition Assistance Program (SNAP)."