CLASP
policy solutions that work for low-income people

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Hearing on Nontraditional Students

Advisory Committee on Student Financial Assistance

CLASP, the Center for Law and Social Policy, is a nonprofit organization that seeks to improve the lives of low-income people by developing and advocating for federal, state and local policies to strengthen families and create pathways to education and work. Within CLASP, the Center for Postsecondary and Economic Success (C-PES) focuses on postsecondary education, workforce, and adult education. The C-PES mission is better policies, more investment, and political will to increase the number of low-income adults and disadvantaged youth who earn postsecondary credentials that are essential to opening doors to good jobs, career advancement, and economic mobility.

CLASP respectfully submits this written testimony on nontraditional students to the Advisory Committee on Student Financial Assistance. Each of the Advisory Committee's published questions is addressed as is a fourth question focused on the role of the federal government in directly assisting nontraditional students. The questions are:

- What are the primary barriers to access and persistence for nontraditional students?
- What are the most promising state and institutional strategies and policies for overcoming those barriers?
- What role should the federal government play in encouraging states and institutions to implement best practices?
- What role can the federal government play directly to help nontraditional students access and persist in postsecondary education?

CLASP appreciates the opportunity to submit written testimony and the Advisory Committee's focus on non-traditional students. These students will continue to be essential to the nation's economic competitiveness, thus assisting them with higher education access, persistence, and completion is increasingly important.

QUESTION 1: What are the primary barriers to access and persistence for nontraditional students?

Nontraditional students face three main barriers to accessing and persisting in postsecondary education:

- **High and persistently increasing net cost of college**, which is driven by increasing tuition, fees, and other direct and indirect costs and by decreasing student financial aid resources.
- **Being academically underprepared** for college-level study.
- **The complexity of navigating traditional college systems**, from enrolling in classes to understanding student aid to successfully managing school, work, and life.

High and persistently increasing net cost of college

Increasing college costs have been well-documented as has reductions in many states' need-based student aid programs. The federal Pell Grant covers a shrinking percentage of college tuition and fees (about one-third today compared to three-quarters when the program began four decades ago). Nontraditional students are especially affected by these growing net college costs because they are more than twice as likely to be low-income than their traditional peers (42 percent versus 18 percent in 2007-2008).[1]

Despite their clear need, many nontraditional students do not apply for student financial aid.[2] Even when nontraditional students apply for and receive aid, a greater number of them have unmet need, and the amount of unmet need for students has increased. For example, the percentage of *undergraduates at two-year institutions* - where many nontraditional students are enrolled - with unmet need after student aid increased from 37 percent in 1995-96 to 50 percent in 2007-08. Their average amount of unmet need increased from $3,000 in 1995-96 to $4,500 in 2007-08. The percentage of *part-time undergraduates* (attending all year) with unmet need increased from 46 percent to 55 percent over this time, and their average unmet need increased from $4,100 to $5,600. The percentage of *independent undergraduates* with unmet need increased from 44 percent to 60 percent, and their average unmet need increased from $4,000 to $6,700. In comparison, overall percentages for *all students* with unmet need increased less dramatically from 46 percent in 1995-96 to 50 percent in 2007-08; however, the amount of unmet need increased just as significantly from $4,100 to $6,800.[3]

Being academically underprepared

Many nontraditional students and are not ready for college-level work. A significant percent of them attend community colleges, where 60 percent of students need remediation. However, few complete developmental education courses they need, and even fewer enroll in and pass their first college-level course. Just three or four out of every 10 referred to developmental education complete all of the courses they need – and the more courses they need to get their skill levels up, the less likely they are to complete all of them.[4]

The complexity of navigating traditional college systems

Nontraditional students face this barrier from two angles. First, institutions of higher education are designed for *traditional* students. Classes are offered during daytime hours Monday through Friday, and administrative offices are usually open only during these times as well. Courses are generally designed for students who are attending full-time, are fresh out of high school, and have few obligations outside of work. Finally, student aid programs tend to favor full-time status and few avenues to receive guidance, advice or supportive services exist because traditional students typically receive these supports from other sources including family and social networks familiar with college.

In comparison, nontraditional students have not been fully prepped for a traditional college experience and their lives do not lend themselves to this design. In 2008, 47 percent of all undergraduates were independent students,[5] meaning that they did not rely on their parents for financial support and, in many cases, also may not have access to valuable career and educational guidance. Also 36 percent of all undergraduates are adults age 25 or over, 46 percent attend part-time, and 32 percent work full-time. These students must balance work, school and family, which make traditional higher education scheduling nearly impossible to accommodate. They rarely find the help they need in choosing programs that best fit their interests and experiences, in enrolling in the right courses, and in accessing enough financial resources to cover the direct and indirect college costs. These students need something different from what traditional colleges offer. While many innovative institutions are moving in the direction to better serve nontraditional students, much more needs to be done.

QUESTION 2: What are the most promising state and institutional strategies and policies for overcoming those barriers?

The barriers that low-income, nontraditional students face to postsecondary success are not fundamentally different from those confronting many other low-income students: the ever increasing cost of college; academic under preparation (coupled with ineffective approaches to remediation); and the daunting complexity of navigating through college, whether applying for financial aid or choosing the right courses. For low-income nontraditional students, these common barriers are compounded by their particular circumstances, which may include having been out of school for years, having families to support, and having child care needs.

Fortunately, many postsecondary institutions and states have been experimenting over the last decade with solutions aimed at addressing these barriers. These solutions include such elements as:

- **Supplementing existing financial aid** with additional aid tailored to the needs of nontraditional students and also helping these students access other available public benefits such as child care, housing and food aid.
- **Creating clearer, simpler paths** into and through college that reflect the diverse goals of nontraditional students, which includes shorter-term occupational certificates as well as longer diploma and degree programs.
- **Adopting new approaches to remediation** that help more students master math, reading, writing, and English skills needed to succeed in their programs of study and that help them earn college credentials faster.
- **Enhancing student services** to give nontraditional students extra help in navigating complex college systems and gaining access to academic and other supports.
- **Linking college more closely to work** through internships and work-study jobs; partnerships between colleges, employers and local workforce boards; and better mapping of college courses and credentials to local employer workforce needs. These steps are especially important for nontraditional students since many of them enter college with the goal of getting a job or moving up to a better one.

CLASP has identified several examples of state and institutional best practices that can help nontraditional students access, persist in, and complete college. Below are longer-running examples with outcomes data demonstrating success. The table provides a quick reference to the programs types of solutions. It is important to note that many programs combine solutions, making for a more well-rounded educational experience and set of supports for the students. Exploring lessons from these state and local initiatives could help inform federal efforts to address barriers to nontraditional student success.

State or local example	Supplemental financial aid	Clearer college and career paths	New approaches to remediation	Enhanced student services	Linking college and work
Opportunity Grants (WA)	•			•	•
Ready to Work (KY)	•			•	•
Career Pathways (OR)		•	• (Portland CC)	•	•
Career Pathway Bridges (WA)		•	•	•	•
CNM Connect (NM)	•			•	

Supplemental Financial Aid and Enhanced Support Services

Two state examples provide instructive examples for how other states might supplement federal student aid to help nontraditional students meet unmet financial need and access and persist in postsecondary education: Washington and Kentucky.

Washington State's Opportunity Grants
Begun in 2006 as a pilot, the program has steadily expanded and, in the 2010-2011 school year, served more than 5,400 students with a state investment of $11.5 million. Opportunity Grants are targeted to low-income students enrolled in occupational programs in high-wage, high-demand career pathways and are designed to supplement other state and federal student aid to address unmet financial need. The immediate goal of this additional aid is to help low-income adults complete one year of college credits and earn an occupational credential. Eligible students enrolled in approved training programs may receive funds to cover tuition and mandatory fees for up to 45 credits and up to $1,000 per academic year for books and supplies. An important part of the program is additional state funds to community and technical colleges for enhanced support services to Opportunity Grant recipients; these may include personalized counseling, one-on-one tutoring, career advising, college success classes, emergency child care, and emergency transportation.

A January 2011 study of Opportunity Grants found that recipients who left college in 2008-09 were 11 percent more likely to complete and 4 percent more likely to finish a year's worth of college credits than similar students. The program had an even bigger impact for the two-thirds of Opportunity Grant students who also received Pell Grants: completion rates were 18 percent higher and the number earning a year of college credits was 11 percent higher compared to other Pell students enrolled in the same programs. This suggests that the effectiveness of federal financial aid can be boosted by a modest investment in additional aid and enhanced student services. The study also examined labor market outcomes and found that, among all Opportunity Grant recipients, post-college employment and earnings were substantially higher for those who completed a credential and for those who earned at least a year's worth of college credits.[6]

Kentucky's Ready-to-Work Program
Similar to Opportunity Grants, this program, started in 1999, pairs increased student aid for nontraditional students—in the form of work-study jobs—with enhanced student services. Ready-to-Work helps low-income parents receiving welfare (Temporary Assistance for Needy Families or TANF) pursue postsecondary certificates and degrees at Kentucky community and technical colleges. In Fiscal Year 2010, Ready-to-Work served approximately 2,000 students with funding of $10.8 million. Students in Ready-to-Work can earn up to $2,500 in TANF-funded work-study opportunities and receive enhanced student services through campus-based Ready-to-Work coordinators and tutors. Work-study jobs are used to build meaningful work experience that can open doors to permanent employment, with some placements off-campus with private employers. They also help students meet their TANF work requirements. TANF funds are crucial to expanding work-study opportunities since federal work-study funds are scarce at community colleges and often insufficient to meet the financial needs of nontraditional students.

The 20 Ready-to-Work coordinators at the state's 16 colleges serve as on-campus case managers, recruiting participants, helping students set education and career goals and access financial aid. They also work with TANF staff and other agencies to arrange support services such as transportation and child care, and they ensure students continue to receive cash assistance. Finally, Ready-to-Work coordinators provide counseling to students at risk of dropping out of college and connect students to educational and employment support, including advising, tutoring, career counseling, job placement, and post-graduation follow-up.[7]

The most recent retention data shows that Ready-to-Work students persist in college at a significantly higher rate than other students (53 percent v. 44 percent). In addition, the program's students earn grade point averages that are as high as or higher than other community and technical college students in the state. For example, in the spring of 2010, 44 percent of Ready-to-Work students had higher GPAs than the college average. One measure of the success of Ready-to-Work is that Kentucky's TANF population now attends college at more than twice the rate of other adults in the state (8.7 percent vs. 3.6 percent).[8] No recent labor market outcome data is available; a 2004 longitudinal study by the legislature found that TANF participants in "job skills education," who are primarily Ready-to-Work students, had the highest entering employment rate, highest fourth-quarter job retention rate, and highest average annual wage (by over $3,500) of any participants in TANF work activities.[9]

Clearer College and Career Paths – Career Pathway Initiatives

Another way in which states and communities are seeking to improve nontraditional student success is through career pathways initiatives. Career pathways are a way to map education and job opportunities in an industry or occupational cluster and to offer a series of connected education and training programs and support services that enable individuals to get jobs in specific industries, and to advance over time to higher levels of education and work in that industry.[10] At each step in a career pathway, education credentials are connected to specific jobs in the local labor market, with each of these credentials embedded within a for-credit degree program or in an apprenticeship pathway. Career pathways not only offer students clearer paths to credentials with value in the labor market, but also make it easier for working adults to complete programs by breaking longer diploma and degree programs into smaller "chunks" so that students can earn marketable occupational certificates as they build credits over time toward a degree. Partnerships with employers are critical to successful career pathways to ensure that credentials are aligned with in-demand jobs and to create paid or unpaid internship opportunities for students in their fields of study.

Oregon's Career Pathways

This initiative began in 2004 as an effort to scale up pathways efforts begun by three local colleges. State support included seed money for expanding pathways, support for creating pathways roadmaps, and a streamlined state approval process for new Career Pathways certificates, with a turnaround time of two months or less (an unusually rapid response for state system offices). To submit a new Career Pathway certificate for approval, a college submits a Career Pathway Roadmap with elements including: occupation, competencies, courses, labor market occupational data (including wages and job progression), articulation with four-year programs; industry credentials; and the employers involved in developing the certificate. Oregon also has facilitated a discussion among college financial aid officers to reach a common understanding of how career pathway certificates should be treated for purposes of federal student aid eligibility. Oregon's community colleges now offer more than 180 career pathways certificates across 17 colleges, and the number completing the program has grown from 500 in 2008-09 to 1,200 in 2009-10. The state's two-year goal is 2,345 completions in Fiscal Year 2011. Portland Community College has an especially impressive pathway effort, with contextualized English as a Second Language (ESL) pathway options and student internships as a standard part of every pathway.

New Approaches to Remediation - Career Pathway Bridges

Career pathway bridges are a newer innovation to increase nontraditional student success. Many low-income, nontraditional students lack the basic academic or English language skills needed to succeed in college programs. Career pathway bridges are simply an extension of the career pathways concept to meet

the needs of lower-skilled adults and youth. These bridges provide targeted basic skills and English language education to help lower-skilled students enter and succeed in specific occupational programs and career pathways. While many variations of career pathways bridge models exist, they share some common elements. Career pathway bridges typically:

- **Combine basic skills and career-technical content,** including general workforce readiness skills, pre-college academic and English language skills, and specific occupational knowledge and skills, supported by comprehensive student services.
- **Contextualize basic skills** and English language content to the knowledge and skills needed in a specific occupation or groups of occupations.
- **Use new or modified curricula** with identified learning targets for both the academic and occupational content, articulated to the next level in the college and career pathway.
- **Change how classes are delivered** using such strategies as dual enrollment in linked basic skills and occupational courses; integrated, team-taught basic skills and occupational courses; and, enrolling students in cohorts (also known as learning communities or managed enrollment).
- **Support student success** through comprehensive student services, often including a single point of contact who helps students navigate through college advising and financial aid services, connects students to other public benefits, and works with students to problem-solve as challenges arise that could derail progress.
- **Connect to local employer and community needs** by engaging key partners in design and implementation of bridges, such as employers, unions, workforce development boards, community-based organizations and foundations.

Career pathway bridges are a relatively new approach to basic skills and career-technical education. Consequently, little independent research has been conducted yet on their effectiveness, though local programs report promising early results.

Washington State's I-BEST Program

Washington State's Integrated Basic Education and Skills Training (I-BEST) program pairs basic skills and career-technical instructors in the same classroom simultaneously to teach integrated occupational certificate and basic skills content. The most rigorous study of this program's effectiveness to date was conducted by Columbia University's Community College Research Center (CCRC) in 2010. The study found that I-BEST students are 56 percent more likely than regular adult basic education and ESL students to earn college credit, 26 percent more likely to earn a certificate or degree, and 19 percent more likely to achieve learning gains on basic skills tests—or more simply, as Washington puts it, I-BEST moves students "farther and faster."[11]

In addition to the CCRC study of I-BEST, considerable research exists on individual elements of bridge programs, such as dual enrollment, contextualization, enhanced student services, and learning communities.[12] This research suggests that these can be effective strategies for improving student completion of basic skills coursework and for increasing enrollment in and completion of college-level courses. While the impact of any one of these strategies alone is often modest, the I-BEST experience lends weight to the idea that such strategies may have more impact when combined, as they are in career pathway bridges.

Enhancing Student Services

Initiatives to increase student access to public benefits represent another promising strategy to help nontraditional students complete college. Public benefits and refundable tax credits can help students to begin to fill the gap between financial aid and the actual cost of attending college. This gap can be

especially large for nontraditional students. For example, federal data show that students who are single parents have the largest unmet financial need of any group.[13] Fortunately these student parents may be eligible for cash and nutritional assistance, child care subsidies, public health insurance, and tax credits. And while low-income students who are not parents are generally eligible for fewer benefits, they may still be able to receive support from the Supplemental Nutritional Assistance Program (SNAP, or food stamps) and the refundable portion of the American Opportunity Tax Credit.[14] Many students are unaware of these public benefits, however, and so colleges and universities have begun to create efforts to help them gain access to them as part of the college completion agenda.

CNM Connect at Central New Mexico Community College

This is one of the longest-running benefits access initiatives in the country. Through CNM Connect, Achievement Coaches work with students to help them develop a plan for overcoming financial and logistical obstacles to completing college. For example, coaches help students connect to public benefits, using such online tools as www.newmexicoresources.org and Single Stop USA's online screening tool for benefit eligibility. Students also participate in financial literacy classes, get help with tax preparation, and are connected to opportunities for matched education savings accounts. The Achievement Coaches provide a variety of other one-on-one supports to students, including help with time management, stress reduction, creation of personal budgets, addressing test anxiety, and referrals to other resources available on campus. CNM Connect is a version of the Casey Foundation's Center for Working Families model, which is being implemented at a number of colleges as well as other sites.

QUESTION 3: What role should the federal government play in encouraging states and institutions to implement best practices?

The federal government can take several steps to encourage states and institutions to implement best practices that help nontraditional students access, persist, and complete postsecondary education. CLASP outlines several options below, including several low-cost actions. Whether addressing barriers pertaining to cost, academic under preparation, or college complexity, the federal government should revisit existing funding programs and waiver authority and better use them to support the most promising practices supported by research (see examples in Question #2). For instance, grants to institutions under the Higher Education Act Title III (e.g., Strengthening Institutions Program and Historically Black Colleges and Universities), Title V (e.g., Hispanic Serving Institutions), and Title VII (e.g., Fund for the Improvement of Postsecondary Institutions) could be more sharply focused on research-supported strategies rather than the open range of possibilities currently allowable.

Also, the federal government should consider using the Department of Education's Experimental Sites Initiative to test innovative models, including those described in the recommendations below, which specifically help nontraditional students access, persist in, and complete postsecondary education. Finally, the federal government should continue and deepen partnerships with the private sector, including philanthropy and employers, to leverage additional funds. The partnership the Departments of Labor and Education has with the Aspen Prize for Community College Excellence is a good example focused on community college completion rates. Perhaps a similar effort focused specifically on nontraditional student success could be considered.

Specific recommendations for the federal government's role in encouraging institutions are provided immediately below. Recommendations for what the federal government can do directly to support nontraditional students are provided in the next question.

Cost of Attending College

- Explore Ways to Encourage Institutions to Dedicate Institutional Aid to Assist Nontraditional Students (low cost)

Lack of affordability and growing unmet need are significant barriers for most nontraditional students and insurmountable barriers for some. Yet, increasing reports reveal that higher education institutions are dedicating their fairly significant institutional resources to students who have the ability to pay for much of their education and can bring revenues to the college.[15] While this may be good for the institution's bottom line because the revenues exceed the aid expended, it does nothing to help nontraditional students access and persist in postsecondary education. The federal government should encourage postsecondary institutions to dedicate institutional aid to assist nontraditional students. Options could include providing incentive funding or matching dollars to institutions that provide institutional aid to low-income nontraditional students. Also, the federal government could consider giving these institutions preference for federal funding awards.

Academic Underpreparation

- Pilot New Developmental Education Models That Contextualize Remediation to Occupational Certificate and Degree Programs (low cost)

More than 60 percent of community college students need to improve reading, writing, or math skills before they can do college-level work.[16] Yet, far too few complete these remedial or developmental

courses. The federal government should provide technical assistance and grants to colleges to try new developmental education models that "bridge" directly to specific occupational certificate and degree programs through contextualized curriculum and intensive counseling and advising for students.

For example, a pilot program called "Bridges from Jobs to Careers" was authorized by the Higher Education Opportunity Act in 2008, but never funded. The Department of Education could implement these pilots, which could be funded with new funds or by repurposing existing funding sources, and share lessons and promising practices nationally.

- Support Developmental Education Reform with Current Leadership and Regulatory Resources (low cost)

There are several low-cost ways that the Office of Postsecondary Education (OPE) and Student Financial Aid (SFA) – both in the Office of the Under Secretary – can support developmental education reform. They could issue guidance that clearly outlines how student financial aid can be used appropriately to support innovative developmental education reforms including career pathway bridges described in the previous section. OPE and SFA also could issue materials and information to help colleges understand more effective developmental education models and how to design and implement them. Finally, these offices could include innovative models such as career pathway bridges in Experimental Sites demonstrations to explore how these approaches can benefit nontraditional students, in particular.

Complexity of Navigating College and Careers

- Pilot Business Workforce Partnerships (low cost)

Colleges often lack the "venture capital" to start up new, credit-bearing programs that can respond to business workforce needs because state funding and federal financial aid typically flow only after students are enrolled in programs. Even during this economic slump, many businesses report that they cannot find enough skilled workers to fill their open positions. Nontraditional students are left on the sidelines. Those who are working often cannot make their work and family schedules match educational program schedules. If they are unemployed, they do not have funds to afford the program.

The federal government could help colleges address these workforce needs while at the same time helping nontraditional students by funding pilot programs that fund partnerships of colleges, employers, and, where applicable, labor representatives, to expand or create credit-bearing college programs responsive to business workforce needs; to adapt college offerings to workers' schedules; to expand worksite learning opportunities; and to purchase equipment related to such academic or job training programs. The grants should be targeted specifically to nontraditional students both to assist this struggling student population and to serve a segment of the labor force most in need.

Congress already has authorized a pilot program to create Business Workforce Partnerships in its 2008 amendments to the Higher Education Act. These pilots should be funded and revised if necessary based on current economic needs and what we have learned about such partnerships to date. These pilots could be funded with new funds or with repurposed existing funds.

- Support Career Pathways (low cost).

Career pathway initiatives – as described in Question #2 – show much promise and are beginning to provide evidence of success. The Department of Labor Employment and Training Administration (ETA), Department of Education's Office of Vocational and Adult Education (OVAE), and Department of Health

and Human Services Administration for Children and Families (ACF) have provided leadership and resources to support career pathways. However, the higher education and student financial aid divisions within the Department of Education have been relatively silent, even though many polices and regulations within these divisions can significantly promote or deter this approach to better serving nontraditional students. Also, most career pathway programs are connected to institutions of higher education.

There are several low-cost ways that the Office of Postsecondary Education (OPE) and Student Financial Aid (SFA) can support career pathway initiatives. They could issue guidance clearly outlining how student financial aid can be used appropriately to support career pathways, i.e., similar to OVAE's guidance on Integrated Education and Training released last year. They could partner with ETA, OVAE, and ACF to sponsor institutes or other training on career pathways, e.g., similar to the Career Pathways Technical Assistance Institute jointly run by these offices in 2010-11. OPE and SFA also could issue materials and information to help colleges understand career pathways and how to design and implement them. Finally, they could include career pathways in Experimental Sites demonstrations to explore how the career pathways approach can benefit nontraditional students, especially, and how it can be integrated into the traditional postsecondary education context.

QUESTION 4: What role can the federal government play directly to help nontraditional students access and persist in postsecondary education?

The most significant role the federal government can play to assist nontraditional students directly is by helping with the high and growing costs of college. Most of the recommendations in this section focus on this role. However, the federal government also can play a role in helping nontraditional students navigate the complexity of college and careers.

Cost of Attending College

- Preserve the Current Maximum Pell Grant and Maintain Commitment to Nontraditional Students' Eligibility

Recently, policy makers and outside experts have floated numerous proposals to reduce Pell Grant expenditures in light of the significant growth in the program over the last three years. All of the proposals would disproportionately harm nontraditional students, including those who work, attend part-time, and have incomes low enough to be eligible for public benefits. Some of the most prominent proposals have included: decreasing the Income Protection Allowance levels in the formula to determine Expected Family Contribution (EFC) and the income level at which students can automatically qualify for an EFC of zero; adding certain public benefits and tax credits to a student's income used to calculate the EFC; increasing the definition of full-time from 12 credits to 15 for Pell receipt; ending the Ability to Benefit provision that allows students without a high school diploma or equivalent to receive aid after showing they can succeed in college; eliminating Pell grants for students attending school less than half time; and further limiting the number of semesters students can receive Pell grants. CLASP has worked with other concerned organizations to analyze the harmful impacts of many of these cuts, and short briefs can be found on the CLASP "Save Pell" webpage. The federal government should maintain a fervent commitment to preserving the maximum Pell Grant and protecting all low-income students' – and especially nontraditional students – eligibility for this critical program.

- Help Provide Nontraditional Students with More and Better Information on College Costs, Student Aid, and Other Financial Supports (low cost)

Student aid award letters sent by colleges are one of the most critical sources of information for students deciding whether to enroll in college and how to finance their education. However, existing letters are inconsistent across colleges and very often only include the most basic information about the cost of attendance and funding sources that are controlled administratively by the individual institution. But, student decisions about how to fund their education are complex and may include funding sources outside of those offered by the institution. In addition, for non-traditional students, the additional costs associated with attending college, such as transportation, child care, and lost wages if they must work fewer hours to attend classes, may constitute a significant financial burden.

The federal government should provide leadership and guidance to colleges to position student aid award letters as better sources of information and as educational tools that help students better understand the true costs of college and develop a plan for funding their education. This could be done by requiring institutions to notify students of other non-institutional benefits for which they may be eligible, such as food stamps and child care assistance; structure the financial aid award letter as a tool that can help students develop a budget and help them plan for any outside expenses; and follow a clear and consistent format so that students can compare financial aid offers from multiple colleges. There are additional ways to provide this valuable information and assistance to non-traditional students, but reforming aid award letters is a meaningful start.

- Lead an Interagency Initiative to Help Nontraditional Students Access Additional Financial Supports (low cost)

Lack of affordability is often cited as the biggest barrier to nontraditional students being able to access, persist in, or complete postsecondary education. In light of the growing net costs of college due to increasing costs and stagnant per-student financial aid, needy nontraditional students would benefit from more information on other financial resources for which they qualify, including other education and training resources, food stamps, public health benefits, etc. The Department of Education should spearhead an initiative in partnership with ETA, OVAE, ACF, the Department of Agriculture, and other relevant federal agencies to provide guidance to colleges on how to help financially needy nontraditional students access additional financial supports in addition to student financial aid for which they quality. Also, federal agencies can provide information about college and financial aid in public benefits offices, one stop career centers, libraries, etc. With more of their financial burden covered, low-income nontraditional students could work fewer hours, dedicate more time to their studies, and reduce their levels of stress associated with constantly worrying about and cobbling together financial resources. These are important elements to helping them persist in college and earn credentials.

- Change the Funding Regulations and Allocations in the Federal Work Study Program to Provide More Benefit for Nontraditional Students and Institutional Equity in the Program (low cost) and Increase Funding for the Program

Many nontraditional students are low-income and must work while they pursue a credential or degree. Although these students could greatly benefit from the Federal Work Study program (FWS), few have any access to it. The federal government should change the regulations in the FWS or conduct a pilot to allow FWS funds to be used to subsidize wages for low-income students to work for small employers ***in exchange for*** the employer providing reduced and more flexible work schedules that allow students to continue their employment and complete their studies more quickly. The pilot would include both currently employed students and their small business employers (this would require a change or a waiver of the current regulation that students cannot be employed under FWS if they otherwise would have been employed by that employer), as well as provide an incentive for small businesses to hire new working students and provide scheduling flexibility for them to attend school. The current allowance for schools to use FWS funds with private, for-profit employers should be maximized to assist as many low-income working students as possible. Additionally, the pilot should allow a small amount of funds to pay for full- or part-time job developers since lack of staff to arrange off-campus placements is a significant barrier to wider use of this provision. This type of pilot program with FWS funds would help nontraditional working students better balance work and school and help small employers retain good workers who are motivated and investing in their education.

The federal government also should update the method of distributing FWS funds among colleges so that these funds flow to institutions with the least resources and the largest concentrations of needy students. The badly outdated FWS distribution formula disproportionately allocates funds to institutions with fewer needy students. For example, "Columbia University receives more than five times as much in work-study allocations as Florida State University, although Florida State has more than five times as many undergraduates, a much higher proportion of whom qualify for Pell Grants."[17] Also, 57 percent of undergraduates receiving FWS are from families earning over $50,000 annually (1 out of every 5 is from a family earning over $100,000 annually).[18]

The old formula should be gradually phased out, and the funds increasingly distributed proportionately to institutions that have the most financially needy students. Finally, the federal government should increase funding for FWS in conjunction with these changes. Given the growing unmet financial need low-income

nontraditional student face and the pressure on the Pell Grant program due to its significant growth, revisiting FWS funding may be a more viable option for increasing aid to needy students.[19]

Complexity of Navigating College and Careers

In addition to assisting nontraditional students with college costs, the federal government can play a role in decreasing the complexity of navigating college and careers – a significant stumbling block for nontraditional students. CLASP's primary recommendation to address this barrier is below.

- Pilot "Student Success Grants" to Colleges to Provide Promising Program Innovations and Student Services That Help Nontraditional Students Succeed (low cost)

Innovations in student supports and student financial aid have shown promise in helping nontraditional students persist in college, e.g., MDRC's Opening Doors initiative and research by the Community College Research Center at Teachers College at Columbia University. The federal government should build from these promising findings with a federal pilot program. Specifically, CLASP recommends a pilot program in which colleges receive additional funds for every Pell Grant student enrolled to offset the costs to the college of providing the kinds of program innovation and student services that research suggests will help students persist and complete college.[20]

Program innovations to test could include curricular redesign to support contextualized and accelerated remediation and providing work study jobs with private employers in the student's field of study. Promising student services may include intensive advising and counseling, college and career success courses, tutoring, and assistance with child care and transportation. The pilots should target students most in need, including those requiring developmental education and the lowest income students. Congress authorized, but did not fund, a similar pilot program called Student Success Grants with the authorization of the Higher Education Opportunity Act in 2008. This concept should be revisited and revised based on the latest research.

[1] *Profile of Undergraduate Students: Trends from Selected Years, 1995-96 to 2007-08*, U.S. Department for Education, National Center for Education Statistics, September 2010, http://nces.ed.gov/pubs2010/2010220.pdf.
[2] *Apply to Succeed: Ensuring Community College Students Benefit from Need-Based Financial Aid*, The Advisory Committee on Student Financial Assistance, September 2008, http://www2.ed.gov/about/bdscomm/list/acsfa/applytosucceed.pdf.
[3] *Trends in Student Financing of Undergraduate Education: Selected Years, 1995–96 to 2007–08*, NCES Web Tables, U.S. Department of Education, January 2011, NCES 2011-218.
[4] Thomas Bailey, Heather Wathington, and Tom Brock, Developmental Education: What Policies and Practices Work for Students, webinar, National Center for Postsecondary Research, December 15, 2010.
[5] *Yesterday's Nontraditional Student is Today's Traditional Student*, CLASP, June 29, 2011, http://www.clasp.org/admin/site/publications/files/Nontraditional-Students-Facts-2011.pdf.
[6] David Prince, *Opportunity Grant Report*. Washington State Board for Community and Technical Colleges, Research Report 11-2, January 2011.
[7] Josh Bone, *TANF Education and Training: Kentucky's Ready to Work Program*. Center for Law and Social Policy, January 2010.
[8] *Promoting Career Pathways Through Greater Education and Training Options: Kentucky's TANF Collaboration*, August 18, 2011 presentation at Region IV TANF conference, Shauna King-Simms, Director of Transitions Programs, Kentucky Community & Technical College System.
[9] Greg Hager, et al., *Improving Fiscal Accountability and Effectiveness of Services in the Kentucky Transitional Assistance Program*, Legislative Research Commission Program Review and Investigations Committee, June 20, 2004.
[10] Davis Jenkins. *Career Pathways: Aligning Public Resources to Support Individual and Regional Economic Advancement in the Knowledge Economy.* Workforce Strategy Center, August 2006.
[11] Matthew Zeidenberg, Sung-Woo Cho, and Davis Jenkins, *Washington State's Integrated Basic Education and Skills Training Program (I-BEST): New Evidence of Effectiveness (CCRC Working Paper No. 20)*, Community College Research Center, 2010.
[12] See the body of research on this summarized in *Beyond Basic Skills.* See also W. Charles Wiseley, Ed.D, *Effective Basic Skills Instruction: The Case for Contextualized Developmental Math*, PACE Brief 11-1, Stanford University, January 2011; and the eight papers in the Community College Research Center's Assessment of Evidence series, listed in *Introduction to the CCRC Assessment of Evidence Series*, Thomas Bailey, Shanna Smith Jaggars, and Davis Jenkins, CCRC, Columbia University, January 2011.
[13] *Trends in Student Financing of Undergraduate Education: Selected Years, 1995–96 to 2007–08*, NCES Web Tables, U.S. Department of Education, January 2011, NCES 2011-218.
[14] Elizabeth Lower-Basch, *The Cost of Learning: How Public Benefits Create Pathways to Education*, Spotlight on Poverty and Opportunity, June 13, 2011.
[15] Mark Kantrowitz, "Targeting of Student Aid Programs According to Financial Need", April 29, 2009, http://www.finaid.org/educators/20090429TargetingStudentAid.pdf; "When It Comes to Saving Pell Grants, Colleges May Be Their Own Worst Enemy," Stephen Burd, Higher Ed Watch, September 22, 2011, New America Foundation, http://higheredwatch.newamerica.net/blogposts/2011/when_it_comes_to_saving_pell_colleges_may_be_their_own_worst_enemy-58027.
[16] Marcie Foster, Julie Strawn, and Amy Ellen Duke Benfield, *Beyond Basic Skills: State Strategies to Connect Low-Skilled Students to an Employer-Valued Postsecondary Education*, March 4, 2011, http://www.clasp.org/admin/site/publications/files/Beyond-Basic-Skills-March-2011.pdf.
[17] Judith Scott-Clayton, "A Jobs Program in Need of Reform," New York Times, September 9, 2011, http://economix.blogs.nytimes.com/2011/09/09/a-jobs-program-in-need-of-reform/#more-13079.
[18] Ibid.
[19] Some of these ideas and others that are similar were recently proposed by Jamie Merisotis, the President of the Lumina Foundation, in a Huffington Post article: http://www.huffingtonpost.com/jamie-merisotis/workstudy-is-about-work-a_b_969017.html. Also, Judith Scott-Clayton of Columbia University's Teachers College recommended reform of FWS to better target truly needy students, to provide more substantive job options, or to consider allowing students to get a grant instead of FWS in this New York Times blog: http://economix.blogs.nytimes.com/2011/09/09/a-jobs-program-in-need-of-reform/#more-13079.
[20] All of the programs described in the comments addressing question #2 in this document have been researched and have shown positive results; many if not most would be prime models for this pilot program. Additional research from the Community College Research Center at Columbia University's Teachers College has found positive results from several program models. See CCRC's Assessment of Evidence Series: http://ccrc.tc.columbia.edu/Publication.asp?UID=845.