CLASP
policy solutions that work for low-income people

August 14, 2015

The Honorable Lamar Alexander, Chairman
Committee on Health, Education, Labor,
and Pensions
United States Senate
Washington, DC 20510

The Honorable John Kline, Chairman
Committee on Education and the Workforce
United States House of Representatives
Washington, DC 20515

The Honorable Patty Murray,
Ranking Member
Committee on Health, Education, Labor
and Pensions
United States Senate
Washington, DC 20510

The Honorable Robert C. "Bobby" Scott,
Ranking Member
Committee on Education and the Workforce
United States House of Representatives
Washington, DC 20515

Dear Senators Alexander and Murray and Representatives Kline and Scott:

Thank you for the opportunity to present comments regarding the reauthorization of the *Higher Education Act* (HEA). On behalf of CLASP's Center for Postsecondary and Economic Success (C-PES), we respectfully submit these recommendations for your consideration and further exploration. C-PES promotes policies and investments to increase career advancement and economic mobility for low-income adults and youth. C-PES has in-depth knowledge of federal higher education, workforce development, youth development, and human services policies, developed through our experience in providing technical assistance to states and colleges on postsecondary access and completion, career pathways, and performance measurement.

In the attached document, CLASP presents our policy recommendations for the reauthorization of the HEA. Our recommendations would reform our nation's higher education policies, by:

- *making financial aid responsive to today's students* through reforms which address the needs and attendance patterns of non-traditional and low-income students;
- *transforming education delivery to support student success* by connecting student financial aid with programs, benefits, and sources of student assistance or available non-Department of Education data; establishing robust career pathways; better integrating competency-based education; and developing workforce partnerships, and
- *leveraging outcome information to support better decision making* through data collections that reflect the current student population and measure their success in finding employment.

Since the last HEA reauthorization, the face of higher education has changed dramatically. The vast majority of students (75 percent) have at least one barrier to educational success; they do not fit the "traditional" student profile of a full-time student transitioning directly from high school to a four-year college or university.[i] Fifty-one percent of undergraduates are independent, 40 percent are adults age 25 or older, 27 percent work full-time, and 26 percent are parents. These students bring life experience, which enhances their educational experience and, at some institutions, contributes to higher completion rates as compared to their younger peers. However, these students are often juggling work and/or family obligations; they need flexible schedules and service delivery modes that accommodate their other responsibilities. They also require better information to make educational decisions. Too often, these students' needs are not met by traditional colleges' offerings, or by what the HEA is designed to accommodate.

Students' struggles with programs and information that do not meet their needs are compounded by unmet financial need. Low-income students attending postsecondary education are facing a more challenging landscape than ever, as employers place an increasing premium on education and training beyond high school. In 2014, the median weekly earnings of someone with a high school diploma were $668, while someone with an associate's degree earned $792, and someone with a bachelor's degree earned $1,101.[ii] This places students in the difficult position of needing postsecondary training but being increasingly less able to afford it: over the last three decades, college costs have increased nearly four times faster than median family income.

These conditions have driven much of the focus of state and federal higher education policy to free and low-cost college programs. While this is a step in the right direction, progress in increasing college affordability has been slow, in part because very often these programs focus only on ensuring that the basics – tuition and fees – are covered. Unmet student financial need goes well beyond just the tuition and fee costs of higher education. On average, a community college student is estimated to incur $16,325 in education-related expenses annually, with only $3,347 of that comprising tuition and fees.[iii] The remaining costs – including transportation, books, supplies, food, and housing – virtually always exceed low-income students' grant aid.[iv] (See graphic below)

Average Unmet Need of Lowest-Income Students Over Time
(inflation adjusted)

Further compounding this problem is the fact that students of color are disproportionately left with unmet need, and the amount of their unmet need is typically larger.[v] This deep and persistent gap in unmet financial need can cause rippling negative effects on students' lives, potentially leading them to stop- or drop-out, borrow more, decrease their course load or increase the number of hours they work per week. Any of these activities can threaten student completion.

Even if a student were to borrow a student loan to cover this gap, college remains unaffordable for many low-income and non-traditional students. In 20 states, independent freshmen attending full-time at the average-priced four-year public institution in their state, can receive the maximum Pell grant ($5,775) and borrow the maximum subsidized Stafford loan ($3,500) and still not have received enough aid to cover tuition and fees.[vi] In the most expensive states (New Hampshire and Vermont) these student aid sources cover less than two-thirds of the costs.

HEA reauthorization provides a significant opportunity for Congress to update the law to reflect the changing face of higher education, as well as boldly reinvent federal higher education policy to ensure America's postsecondary education system has what it takes to educate an increasingly diverse student body while accommodating the needs of a rapidly shifting labor market. The policy recommendations outlined below (some of which will be provided in additional detail over the coming weeks) will meet the needs of this changing landscape.

If you have any questions about these proposals, please contact Lauren Walizer at lwalizer@clasp.org.

Sincerely,

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SUMMARY OF RECOMMENDATIONS

Making Financial Aid Responsive to Today's Students

This section includes policy recommendations that focus on the needs of non-traditional and low-income students through targeting aid to individuals with the greatest financial need and to the institutions that serve them, and ensuring the student aid programs address these students' needs and attendance patterns. Specific policy suggestions include:

1) Reinstate Year-Round Pell Grants
Allow students to receive aid more flexibly for year-round study, enabling them to respond to changing family and life circumstances or accelerate their studies.

While available only for a short time before being eliminated in the *Consolidated Appropriations Act of Fiscal Year 2012*, "summer Pell" – the ability for institutions to award two scheduled Pell grants in one academic year – positively impacted an estimated 1.2 million Pell recipients with an average of $1,700 in additional student aid in academic year 2010-2011 alone.[vii]

This provision allowed students to use their financial aid awards more flexibly and continuously throughout their program, even if they chose to take courses over the summer term. Removing the option for a flexible Pell grant had a significant impact on students who must work while in school, who must adapt to changing family and life circumstances, or who may be interested in accelerating their course of study and obtaining employment more quickly. Yet low-income, working students are rarely able to cover the cost of a summer term without access to additional grant aid.

We recommend restoring access to year-round Pell by inserting the previously enacted language in Section 401(b) from the 2008 HEA reauthorization. Making this change would enable more low-income and working students to earn credentials quickly and on a schedule that can accommodate family responsibilities and changing life circumstances. Research has shown that continuous enrollment is associated with higher rates of degree completion.[viii] Enrolling in a summer term improves a student's ability to complete their program and enter or advance in the labor market more quickly.

Congress should also eliminate the need to re-file the Free Application for Federal Student Aid (FAFSA) annually for recipients who enroll continuously at the same institution.

2) Restore the Full Pell Award Eligibility for All Students under the Ability to Benefit Provision
Allow those students who access postsecondary education through the Ability to Benefit provision to receive a full Pell award.

The loss of the Ability to Benefit (ATB) provision between 2012 and 2014 threatened the economic mobility of low-skilled adults and youth seeking postsecondary credentials to improve their job prospects. Forcing students who can benefit from college to sequentially earn a high school equivalency and only afterward pursue a postsecondary credential drags out their educational pathway, prolonging their time to degree and access to wages sufficient to support their families. Furthermore, it is disproportionately harmful to low-income, first-generation, and minority students. For instance, Hispanic and Black students combined make up 29 percent of all undergraduate students; however, they are heavily overrepresented among ATB students. Thirty-one percent of ATB students are Hispanic, while 19 percent are Black.[ix]

Without ATB, these students are forced to earn a high school equivalency in order to access student aid. Demand for a high school equivalency and adult education exceeds capacity: at least 160,000 adult education students are on waiting lists and nearly every state reports a waiting list for services.[x] Moreover, earning this equivalency does not ensure increased student success: in a U.S. Department of Education study, students who earned their ATB by passing six credit hours completed almost as many credits and had a slightly higher grade point average than Title IV (student aid) recipients with high school diplomas.[xi]

Congress partially restored ATB in the Consolidated and Further Continuing Appropriations Act of 2015, but under this provision, students who qualify cannot access the full Pell award supported by both discretionary and mandatory funds, which has created an unprecedented two-tiered Pell eligibility system. Congress should swiftly restore ATB through HEA reauthorization by removing this limitation in Section 401(b)(2)(A)(ii).

3) Reduce the "Work Penalty" by Increasing the Income Protection Allowance

Reduce the "work penalty" for low-income, independent students by expanding the amount of income a student can keep for minimal living expenses before being expected to contribute toward college costs.

The Income Protection Allowance (IPA) is the amount of income a student or family can keep to cover minimal living expenses before being expected to contribute toward college costs. According to one financial aid expert, it is "a modest allowance for basic living expenses. It barely addresses well-body care."[xii]

It is more significant than ever to support working students: a majority of students are engaged in work while attending postsecondary education and training, as 39 percent are employed part-time, and 27 percent full-time.[xiii] Independent students who work while attending school spend an average of 33 hours at a job per week. Of students who work approximately that many hours per week, less than one quarter earn as much as $15,000 per year, which is below 150 percent of the federal poverty level for a family of one.[xiv] Recent proposals to decrease the IPA levels for independent students (and the incomes of dependent students) in the federal student aid need analysis formula are especially detrimental to these low-income, working students.

The IPA keeps already very low-income students from having to use a share of their earnings to pay for the cost of college and related expenses, as calculated by their Expected Family Contribution (EFC). This increase in students' EFC would result in a reduction of their federal aid eligibility. For the typical low-income, working, independent student with no dependents, this could result in a loss of nearly half his or her Pell Grant.[xv] At least 95 percent of independent community college students in the bottom two income quartiles already have significant unmet need not covered by grants or other student aid.[xvi]

To avoid penalizing students who must work while enrolled in school, we recommend expanding the IPA up to 150 percent of the federal poverty level (to be updated annually). Congress has already expressed in statute the principle that income below 150 percent of the poverty line must be protected when calculating the amount of income eligible for income-driven student loan repayment plans.[xvii] This same standard should apply while students are in-school, have less education and training, and thus, presumably, less income and ability to financially support both their education and life obligations. In 2012, for instance, fewer than 10 percent of 2007-08 postsecondary graduates reported earning less than $20,000 per year; in contrast, among currently enrolled independent students, half were earning between $1 and $20,000 annually.[xviii]

Congress should also consider modifying the IPA amounts – provided in statute at Section 475(c)(4), Section 476(b)(1)(A)(iv), and Section 477(b)(4) – to include an adjustment based on the cost of living in different geographic areas. A recent analysis of cost-of-living estimates at the county level showed that total costs (room and board plus transportation, health care, and miscellaneous expenses) ranged from $9,126 to $24,426 for a typical nine-month academic year.[xix] Because 64 percent of students live 25 miles or less from their institution, incorporating this adjustment would be more reflective of students' actual living expenses.

4) Harmonize Pell Grant Requirements

Increase the semester cap on Pell Grants to ensure students have access to Pell throughout the entire course of their program of study and produce better alignment with Satisfactory Academic Progress requirements.

As part of the *Consolidated Appropriations Act of Fiscal Year 2012*, the lifetime limit for the receipt of a Pell Grant was reduced from 18 semesters (9 years) to 12 semesters (6 years). This has a detrimental effect on all students, but particularly low-income students seeking four-year degrees. A study of community college students in Alabama, Arkansas, and Mississippi estimated that approximately 17,000 students lost eligibility for Pell in 2012-2013, with two-thirds of those students at public institutions.[xx]

The current limit is harmful. First, it counts time spent taking developmental (remedial) coursework toward the students' lifetime eligibility limit. At community colleges, a majority of students require developmental education. Students should not be penalized for needing to increase their skills before entering college-level coursework. Many students who return to postsecondary education after significant time away or were not adequately prepared by their secondary school for postsecondary education have skills that need brushing up. Second, while some low-income students initially attend shorter-term certificate programs, this may not be their terminal point; one-quarter of students who begin at two-year colleges transfer to a four-year institution within five years.[xxi] Third, students who transfer from a two-year to four-year institution often face the additional limitation that not all of their credits will transfer. On average, students lose an entire full-time semester (13 credits) upon transfer – credits for which their Pell eligibility will not be restored.[xxii]

The current limit is also arbitrary: in order to maintain financial aid eligibility, students are required to maintain Satisfactory Academic Progress (SAP). SAP guidelines allow for aid eligibility up to 150 percent of program length. The current 12 semester cap on Pell grants does not align with that requirement. For a student in a full-time program taking 12 credits per semester (a full-time course load), this equates to 7.5 years, [xxiii] since taking 12 credits instead of 15 can add a year to a 4-year degree program.[xxiv] For many students balancing work, family, and school, enrolling in 12 credits already maxes out their time and finances. Under the current Pell semester cap, a full-time, low-income student would only be eligible for Pell aid for 6 years, leaving significant unmet need in their final year of study and threatening their completion.

To remedy this potential unmet need gap, CLASP recommends amending Section 401(c)(5) to increase the semester cap on Pell Grants from 12 to 15 semesters to ensure students have access to the financial resources they need throughout their entire course of study, while creating consistent programmatic alignment with the existing SAP requirements.

Further, CLASP believes Congress should consider modifying the lifetime eligibility rules for students whose student loans are discharged as a result of a closed school or other institutional fraud (which has become a significant problem for many). Because students are very often forced to forfeit the credits they accumulated, they should not be doubly punished by taking time off their Pell clock for learning that they cannot count toward a degree.

5) Maintain the Pell Grant's Spending Power

Make permanent the statutory increases to the Pell Grant award tied to the Consumer Price Index, which are currently set to end in 2018.

It is well known that the costs of higher education have risen for decades, making it increasingly difficult for low- and middle-class families to afford higher education, even with the benefit of a Pell Grant.[xxv] In award year 2014-2015, it is estimated that the maximum Pell will only cover 30 percent of a student's tuition, fees, food, and housing at a four-year public institution, whereas in 2001-2002 it covered 42 percent.[xxvi]

Contributing to this gap is that maximum Pell Grant levels remained frozen between 2010 and 2013 at $5,550. Since 2013, the Health Care and Education Reconciliation Act provided for an increase to the maximum award tied to the Consumer Price Index (CPI). This increase will continue through 2017, at which time the grant will once again be set at a level amount. In 2013 the Congressional Budget Office estimated that, in real terms, allowing the increase to expire would cause the average Pell Grant to "decline by 12 percent in real terms" over the award years 2012-13 to 2023-24.[xxvii]

Congress should take the initiative to address this issue now. During 2010-2013, while Pell remained stagnant, the average tuition, fees, room and board at postsecondary institutions rose 7.4 percent.[xxviii] To allow another period of eroding Pell Grants will further threaten college affordability for students, forcing low-income students to make difficult choices about whether they can continue to afford pursing a credential. Addressing this issue now would give students assurance that their Pell Grant will be more reflective of the current economy and has a chance of keeping pace with other costs in students' lives.

6) Preserve Eligibility for Half-Time and Less-Than Half-Time Students

Preserve continuous student aid eligibility for students who mix enrollment over the course of their college program, including when they attend less-than-half-time.

Significant evidence points to the idea that, most frequently, student enrollment at a less-than-half-time rate is temporary (typically for only one term),[xxix] and may often be caused by factors out of the student's control, such as courses not being available or being full.[xxx] In other cases, working while in school may require periods of reduced enrollment, including attending part-time or less-than-half-time. A growing proportion of undergraduate students must work while they are in college: in 2011-2012, among students who were employed, 63 percent of dependent students and 83 percent of independent students worked 20 hours or more per week. In fact, more than half of undergraduate students mix full and part-time enrollment status over the course of their program; only 7.2 percent attend exclusively part-time.[xxxi]

Grants during these periods of lower enrollment intensity help students keep momentum and avoid dropping out entirely due to financial circumstances.[xxxii] Recent research from the Community College Research Center finds that students who maintain "consecutive enrollment" are more likely to complete a credential. [xxxiii] Similarly, according to a Department of Education analysis of student paths from high school to college, continuous enrollment "proves to be overpowering: with 16 other variables in play, continuous enrollment increases the probability of degree completion by 43 percent."[xxxiv] Importantly, for non-first-time students, mixing part-time and full-time enrollment leads to a reduced likelihood of dropping out and an increased chance of completing their associate's degree.[xxxv]

Congress should preserve student aid for those who attend a mix of full- and part-time while in school – including those who need to enter into a less-than-half-time status – thereby supporting national college attainment goals and helping more low-income, working students earn postsecondary credentials.

7) Maintain the Full-Time Enrollment Standard of 12 Credits Per Term

Continue to allow students enrolled in 12 credits per term to be counted as full-time students for the purposes of financial aid eligibility.

While a students' enrollment intensity can often predict their persistence and success, the issue is actually far more nuanced. Currently, students can receive Pell Grants for two semesters or three quarters during the academic year; however, they cannot receive additional funds to cover summer terms. This inhibits year-round credit accumulation. Further, many non-traditional students struggle to enroll in more than 12 credits per semester because they are raising families and/or work while in school. For instance, among students working at least 30 hours per week, the graduation rate is lower for those enrolled in 15 credits than those enrolled in 12 credits.[xxxvi] Nearly one-quarter of students (23 percent) who are enrolled full-time are considered to be an employee enrolled in school (as opposed to a student who is working to meet expenses).[xxxvii]

Factors other than employment can greatly affect a student's ability to enroll full-time. Institutional policies often inhibit student attendance in more than 12 credits per semester by creating additional costs for enrollment in 15 credits. Students may also have family obligations or other demands that cannot be pushed aside to accommodate a 15-credit enrollment status. More than half of full-time students have at least one characteristic that can make it difficult to enroll in additional credit hours.[xxxviii]

In these cases, students are likely pursuing their education at the maximum enrollment intensity that is financially and logistically possible for them at the time. Students should be encouraged to complete as many credits and as many terms per year as is appropriate for them. CLASP recommends that financial aid programs continue to define "full-time" as 12 credits per term (Section 481). To further encourage students to enroll at the highest intensity possible, this policy should be considered in conjunction with allowing expanded access to financial aid over the summer term in the form of year-round Pell, which can allow students to take 12 credits per term while still finishing on-time if they enroll in the summer term.

8) Redesign the Supplemental Educational Opportunity Grant Program to Better Reach and Support Those with Greatest Financial Need

Limit Supplemental Educational Opportunity Grant funds to Pell-eligible students only, and distribute funds to institutions based on their proportion of Pell recipients; allow funds to be used as emergency aid for students who are currently Pell-eligible or were in either of the previous two academic years; continue to require the 25 percent institutional match, unless the funds are used for emergency aid.

Annually, more than $730 million is dedicated to institutions to award Supplemental Educational Opportunity Grant (SEOG) funds, which are need-based awards designed to give a priority to Pell-eligible students. However, the institutions to which these funds are distributed, compared to where Pell-eligible students attend, are far from the same. For instance, in academic year 2012-2013, 13 percent of all Pell recipients were enrolled at private institutions, while these institutions enrolled 21 percent of SEOG recipients and received 35 percent of available SEOG aid.

This happens because the current allocation formula rewards institutions with a high cost of attendance by allocating them more funding. If this program were truly dedicated to serving the highest need students, the funding would go where these students are. We recommend reforming the SEOG program to better target aid to low-income students. Reforms could include distributing SEOG funds to institutions based on the proportion of Pell-eligible students – by modifying the allocation formula in Section 413D – instead of basing allocations on institutional longevity in the program, as is done now. CLASP further proposes a requirement that only Pell-eligible students can receive SEOG funds; again, targeting aid to those most in need. This would be done by modifying Section 413C(c)(2)(A) to reflect the exclusive access to, rather than the "priority" for, SEOG funds to these students.

CLASP also believes Congress should consider a provision in Section 413C allowing institutions to provide SEOG funds to students for emergency aid purposes. These types of programs have been known to provide temporary relief for students who might not otherwise complete their course of study and meet a demonstrated high demand for emergency aid. For instance, in its first two years of operation, the Dreamkeepers and Angel Fund programs awarded more than $845,000 to students at participating institutions who were facing sudden financial emergencies.[xxxix] There is demonstrable need for aid in emergency circumstances and this aid nearly always means the difference between staying in school and dropping out. Georgia State University proved this fact with its Panther Retention Grants, which since 2011 has awarded grants to students who owed as little as a few hundred dollars. In one year, thanks to the program, 2,600 students who had dropped out returned to class, and 70 percent of students who were within two semesters of graduation when they received the grant have completed their program.[xl]

We would suggest that this new SEOG-funded emergency aid benefit should be available to students who are currently Pell-eligible, as well as those who were eligible in the prior two academic years. While the current 25 percent institutional match would remain in place in the SEOG programs, institutions should be exempt from this requirement if the funds were used for emergency aid. This would provide incentives for more institutions to develop such aid programs.

9) Revise the Federal Work-Study Formula and Align Work Placements with Student Field of Study

Distribute funds to institutions based on their percentage of Pell recipients and align work assignments with student program of study; continue to require the same matching requirements and continue the current treatment of work colleges.

Nearly $1 billion is provided to colleges annually through the Federal Work-Study (FWS) program in exchange for those institutions providing subsidized employment to enrolled students. In theory, FWS funding is a valuable source of campus-based aid for low-income students who need additional resources to meet their financial obligations for books, tuition, and other living expenses. Yet in practice, the majority of FWS funding goes to students who are not low-income – indeed, one-quarter of dependent recipients has a family income of $80,000 or more – and to those who attend private institutions that have other resources at their disposal.

In addition, current law requires colleges to align jobs provided with FWS funds with the students' course of study "to the maximum extent practicable,"[xli] though most FWS placements are campus-based and provide few career-specific learning opportunities. Providing work experience aligned to a student's course of study could offer the dual benefit of providing income and boosting future employment prospects by connecting students with local employers in their field of study. Some institutions have specific strategies to maximize the benefits of employment through FWS; for example, the University of Maine at Farmington integrates on-campus job opportunities with students' majors. The positions are reviewed and must include descriptions of "skill development objectives, working conditions, and supervision."[xlii]

We recommend reforming the FWS program to better target aid to low-income students. Financial support through the FWS program suggests that low-income and underprepared students see greater improvements in academic outcomes than for other working students,[xliii] indicating that there "may be gains to improved targeting of funds" to these types of students.[xliv] Congress should include a provision in Section 443(b)(3), which would require institutions to prioritize Pell-eligible students when awarding funds. Reforms could include distributing FWS funds based on the proportion of Pell-eligible students at the institution – by changing the allocation formula in Section 442 – instead of basing allocations on institutional longevity in the FWS program, as is done now. We also recommend better leveraging the FWS program to provide meaningful, industry-relevant employment in a student's field of study. This could include eliminating the 25 percent cap on private sector employment (see Section 443(c)(2)) and phasing in stricter requirements that placements are related to a student's field of study (through strengthening the required assurance in Section 443(b)(7)). These FWS reforms would help low-income, working students better balance work and school, while also helping small employers retain good workers who are motivated and invested in their education.

CLASP also supports work-study policies that would enhance available program data and encourage transparency of placements. We also recommend providing funds for experimentation to foster innovative practices and further research such as pilot programs that would integrate with career pathway approaches or expand the current ability of institutions to award FWS academic credit in addition to earnings, among others.

10) Create a Negative Expected Family Contribution Category

Create a "negative expected family contribution" calculation in the need analysis so that low-income students can document the full extent of their financial need, and provide additional Pell aid to the neediest students to meet their cost of attendance.

Currently, all students whose assets and income fall below the established levels necessary to pay for their indirect educational expenses receive an EFC of zero. This calculation is severely limited, as there is no way to identify the true gap between a student's resources and the direct and indirect educational costs of attendance: a student with a family size of three with household income at the federal poverty level ($20,000) can appear to have the same financial need as one whose income is far below the federal poverty level ($5,000). The EFC formula is capable of deriving a negative number, yet under current policy, both of these families would be determined to have an EFC of zero.

Congress should allow for a negative EFC calculation, which could target Pell funds more efficiently to those in the most need. It also could help address racial equity differences in the FAFSA: overall, families of black students have debt-to-asset ratios that are 50 percent higher than those of white families. Thus, because the current formula does not consider debt, "black students are disproportionately likely to receive less financial aid than they need."[xlv]

This proposal would allow for additional Pell aid of up to $750 to be awarded to help fill that gap. For instance, a student who qualified for the maximum Pell grant and had a negative EFC of $750 would have a total Pell grant of $5,915 plus $750, or $6,665. In no case, however, could the Pell award exceed the cost of attendance.

Transforming Education Delivery to Support Student Success

This section includes policy recommendations that would improve the student experience and government efficiency by aligning relevant program aspects from federal student aid, the Internal Revenue Service (IRS), public benefits, and workforce development (including career pathways and effective learning models for low-skilled adults, and developing workforce partnerships). It also discusses considerations for integrating competency-based education into the current higher education system. Specific policy suggestions include:

11) Give Low-Income Students Access to More Comprehensive Financial Supports
Build benefits access and awareness into the HEA through more concrete connections with other HE programs.

There is a growing understanding that because federal and state financial aid are insufficient to meet their full cost of attendance, students need access to more comprehensive financial supports in order to persist in and complete college. These supports, which include the receipt of public, means-tested benefits (such as nutrition, child care and transportation assistance, and refundable tax credits like the Earned Income Tax Credit), can help low-income students make ends meet while in school.

Several colleges across the country have become attentive to this need and are connecting students with public benefits through their financial aid and counseling offices or through standalone offices. As part of the national Benefits Access for College Completion project, Gateway Community and Technical College (KY) connected low-income students to public benefits, such as the Supplemental Nutrition Assistance Program (SNAP), child care, and Medicaid. An analysis of this strategy revealed that benefits access can have a positive impact on students' academic progress toward degree completion, with students who received benefits completing more terms, on average, across the initiative than those who did not receive benefits. This is especially true for students who bundle multiple benefits while enrolled.

Given the positive effects demonstrated by these colleges' experiences, and the continuing struggle to close the gap in unmet need, we recommend several changes to the HEA to encourage more institutions to connect students with comprehensive financial supports, including benefits, which can serve as a short-term support for the longer-term gain of a degree and a family-supporting job:

- Support the connection of low-income students to public benefits and refundable tax credits by including it in the recommended activities under Title IV TRIO programs, particularly Student Support Services.
- Increase minimum grants and funding for Student Support Services and focus new funding on connecting students to comprehensive financial supports.
- Add connecting low-income students to comprehensive financial supports, including public benefits, to the authorized activities for institutions receiving funding through Title III and Title V. Students with the highest unmet need levels are often at minority-serving

institutions, including Historically Black Colleges and Universities, and Hispanic-Serving Institutions.

- Exclude Unemployment Insurance funds from income determinations in the need analysis. Currently, financial aid administrators have the discretion to do so, but there is great variation across institutions as to how this discretion is applied. By automatically disregarding these funds, more low-income, unemployed students or children of unemployed workers, will gain access to the financial aid they need.
- Include connecting students to comprehensive financial supports beyond financial aid as a grant-eligible activity to improve postsecondary opportunities in the Fund for the Improvement in Postsecondary Education.
- Mandate the formation of an inter-departmental working group comprised of representatives of the Departments of Agriculture, Education, Labor, and Health and Human Services to streamline public benefits policies, such as Temporary Assistance for Needy Families, SNAP, and child care, with the goal of financially supporting the attendance and success in postsecondary education for low-income students.
- Expand funding for Child Care Access Means Parents in School (CCAMPIS) to increase the availability of on-campus child care for Pell-eligible students who are parents.
- Further test the impact of benefits receipt on college persistence and completion rates through the Experimental Sites Initiative (Section 487A).

12) Simplification: Implement Use of Prior-Prior Year, Increase Use of the IRS Data Retrieval Tool, and Raise the Automatic Zero EFC Threshold

Make the aid application process simpler by allowing the use of income from the second prior year ("prior-prior year") to serve as the basis for student (or student family income), increase the income eligibility for auto-zero EFC, and increase the use of the IRS Data Retrieval Tool.

With the introduction of the Data Retrieval Tool (DRT), students and parents can now use the IRS to import from their filed tax returns much of the data needed to complete the FAFSA. This has several benefits: it saves time, it increases data accuracy, and it reduces the chances of a family's application being selected for verification.

However, timing is an issue since it can take as long as 11 weeks (for mailed returns; 3 weeks for electronically filed ones) after filing for tax return data to become available through the Retrieval Tool. Financial aid applications frequently must be submitted early in the year, well before tax returns are due, either because aid is awarded on a first-come, first-served basis, or because of scholarship deadlines. Consequently, this results in most families being unable to file their taxes in time to be able to use the DRT.

Many more aid applicants could likely use the DRT if they were allowed to use "second prior" year tax data (the tax year that was two years before enrollment, or the "prior-prior year"), but currently the Department of Education only has the authority to allow this within the narrow context of a demonstration project. Allowing students the ability to use data from the prior-prior year gives them access to more relevant information further in advance, so they can make more informed college decisions. Also, it reduces the burden on institutions to verify application data, and allows them the ability to redirect that staff energy into supporting and responding to questions from students.

CLASP supports allowing the use of income from the prior-prior year to serve as the basis of student (or student family) income and permitting students and families to use the DRT to import that data. We remain concerned about the effect of this change on those students or students' families who have experienced a significant income change in between the prior-prior tax year and the time of enrollment. Therefore, we strongly encourage Congress to include language explicitly encouraging the use of professional judgment by financial aid administrators for students in such a situation. We believe it is important to include the language in this section of the law, in addition to the traditional professional judgment language found later in Title IV, Part E, so as to underscore the importance of aid administrators using their discretion for these cases.

Increasing the automatic zero EFC threshold would allow more students to fill out a simplified form based on their qualifying income. In the 2015-2016 academic year, students qualify for an automatic zero EFC if their (or their parents') income is $24,000 or less and they (or their family) meet other eligibility requirements (e.g., receipt of selected public benefits or use of a simplified tax form). Qualifying for a zero EFC is significant because it deems that these students are unable to provide any financial resources for their college education, and would likely result in the highest maximum grant aid for a given cost of attendance.

When the threshold was lowered to $24,000 in the *Consolidated Appropriations Act of Fiscal Year 2012*, the new income maximum took away postsecondary student aid for low-income students by overestimating the resources available to needy families and thereby reducing their potential grant aid. This change was estimated to have the most impact on vulnerable students and families between 150 percent and 190 percent of the poverty line.[xlvi] An income of $32,000 is below 150 percent of the poverty level for a family of three; these families often struggle to meet even basic living expenses.

Students with such low incomes should be able to receive a full Pell Grant to help them meet college costs while avoiding reliance on student loan debt or working excessive hours while in college, both of which are factors that threaten completion. An analysis of students attending public institutions in Kentucky revealed that the reduction in the automatic zero EFC level had a negative impact on Black and Hispanic students disproportionately at four-year institutions, additionally threatening their chances of completion, as they have historically lower rates of program completion than white students.[xlvii]

Had the automatic zero provision not been altered in FY 2012 and have been allowed to continue to increase by the Consumer Price Index, the current automatic zero threshold now would be $33,000. CLASP recommends establishing $33,000 as the new threshold, and indexing the amount to increase annually with inflation in the future.

13) Innovate Using Competency-Based Approaches in Postsecondary Education

Embrace policies about competency-based approaches that focus on quality assurance, capacity-building, alignment with other federal programs, assessment and evaluation, and data transparency.

Competency-Based Education (CBE) has the potential to provide flexible, yet quality-assured learning and credentialing options to better serve the needs of today's diverse student body, including low-income working students or students who would benefit from adaptive learning approaches, navigational supports, and structured educational pathways to postsecondary and career success. CBE focuses curriculum, assessment, and accountability on student learning outcomes, thereby increasing the relevance of credentials to employers. CBE can bridge many of the disconnects that currently exist in postsecondary education programming and credentialing, including between credit and non-credit coursework, workforce and academic programs, and applied and transfer programs. By focusing on learning rather than time in the classroom, CBE can also save money by giving credit for prior learning and the flexibility to move through the curriculum at an accelerated pace.

HEA reauthorization should encourage innovation in competency-based approaches. First, Congress should expand the U.S. Department of Education's Experimental Sites authority (Section 487A) in this area, especially to assure the quality of competency and assessment validation processes and program-level quality assurance, and to strengthen evaluation provisions so as to better inform future policy. Changes to the HEA should support capacity-building activities in areas including career pathways and stackable credentials, by supporting the development of improved transfer and articulation agreements and scalable credit for prior learning processes. It also should seek to support capacity building in the areas of competency-based assessment and curriculum.

In addition, Congress should require a greater focus on learning outcomes and transparency on labor market relevance and portability of credentials, through the use of data for consumer information and navigation support systems. These provisions should be aligned with similarly-directed provisions in the Perkins and Workforce Innovation and Opportunity Acts, particularly those related to stackable credentials, industry partnerships, and increased focus on learning and labor market outcomes.

14) Aid State and Institutional Efforts to Codify Programs that Serve as Innovative Learning Models for Low-Skilled Adults

Increase the focus on program designs that produce high-quality results and help low-skilled, working students complete postsecondary credentials and secure good jobs.

More than 60 percent of community college students are referred to at least one developmental education course upon enrolling in college, with many students being referred to a full sequence of three to five courses.[xlviii] Yet recent research shows that prescribing long sequences of developmental education may actually be hindering student progress rather than successfully preparing students to transition to college-level work.

The HEA should promote the creation of pathways that enable students to move into postsecondary education and training programs more quickly, complete credentials, and transition into careers or to four-year institutions. For students in college occupational programs, evidence from the Community College Research Center (CCRC) points to promising models that "bridge" directly to specific occupational certificates and degree programs through contextualized curriculum and intensive counseling and advising for students. Students in these programs are able to begin their credit-bearing course of study while simultaneously brushing up on basic reading, writing, and math skills. Similarly, a study showed that students in the Community College of Denver's FastStart program – which condensed two levels of developmental education into one semester by using contextualized instruction and wraparound support services – performed better than the college's general remediation education programs.[xlix]

Considering the projected demand for workers with higher levels of education and the known challenges for basic skills students, the goals, content, and delivery of developmental and adult education services need to be rethought. Congress should create policies that are supportive of high-quality programs and best practices designed to serve low-skilled students. This should include revisiting programs already enacted in the HEA, such as the Business Workforce Partnerships (Section 803) and Bridges from Jobs to Careers (Section 851), which leverage best practices at institutions to strengthen ties between academic offerings and the workforce, and promote innovation in program content and delivery.

CLASP is currently developing additional recommendations, to be released in the fall, to further refine this principle.

15) Clarify the Financial Aid Eligibility Requirement for a Minimum of 16 Semester Hours and 15 Weeks

Allow students taking short-term training programs of proven quality and outcomes to access financial aid.

The Higher Education Act states that for a certificate program of less than one year in length to be eligible for federal financial aid, it must be at least 600 clock hours of instruction, 16 semester hours, or 24 quarter hours, and offered for at least 15 weeks.[l] However, many career pathway programs, which target occupations in growing fields with family-supporting employment and works with employers to grow skilled workers, include first step(s) in the pathway that do not meet the duration required by this provision of the statute. At the end of such short-term programs, students receive a credential that has demonstrable value to local employers. Additionally, this step is part of an articulated pathway, which students continue to follow in order to advance their proficiency and skills, and earn additional credentials.

Students and institutions are thus put in the position to either pay for this initial level of training without Title IV funds (for which the student would otherwise qualify), or to enroll the student in more credits than are necessary to complete the training, in order to enable the student to access federal student aid funds. The former can threaten student access to a program with proven employment outcomes; the latter is a waste of both students' time and taxpayers' resources, and further, needlessly decreases the student's remaining lifetime eligibility for Pell Grants.

Congress should provide institutions with clarification about how short-term training programs that are appropriately embedded in career pathways can be made eligible for federal student financial aid.

16) Incent States to Provide Opportunities for Community Colleges to Build Innovative Workforce Development Partnerships

Provide funding to states to adopt more coordinated planning and implement evidence-based initiatives to improve student completion rates and employment outcomes, especially for at-risk students.

Over the past two decades, national investments in local community and technical colleges have spurred innovation, built capacity for partnerships to deliver the skills needed by industry, and led to significant and positive programmatic and institutional changes that have lasted beyond the initial intervention. Community-Based Job Training grants, Health Profession Opportunity Grants, and the Trade Adjustment Assistance Community College and Career Training grants have strengthened higher education institutions' ability to prepare workers for high-wage, high-demand occupations, and have documented the efficacy of providing support services to low-income, lower-skilled participants.[li] HEA reauthorization offers an opportunity to codify lessons learned from these experiments and replicate successful programs.

Congress should build on the model outlined in the Grants to Eligible States for Community Colleges proposed in Section 504 of the Student Aid and Fiscal Responsibility Act of 2009 (H.R. 3221) which passed the House on a bipartisan vote.[lii] This program would offer incentives to states to support reform and adopt best practices of demonstrated effectiveness. In addition to the requirements that institutions demonstrate their effectiveness at improving completion rates (including by subgroups of students), improving employment-related outcomes, serving high-need students, and building or enhancing partnerships with workforce investment boards, CLASP recommends that funds be made available for:

- Interagency planning to increase alignment of policies and standards among postsecondary education, workforce development, and human services;
- Engaging state policy leadership and the workforce community;
- Creating state incentives, including matching funds for local implementation of comprehensive service delivery approaches;
- Developing comprehensive longitudinal data systems, including across adult education, career and technical education, and workforce development programs;
- Preparing a strategic communications strategy about the necessity for systemic policy change; and,
- Capacity-building efforts.

Such statewide policy alignment is essential for successful transformation of state policies and systems and long-term sustainability of these reforms at the college level, allowing for more students at risk of non-completion to achieve credentials that lead to family-supporting employment.

Leveraging Outcome Information to Support Better Decision Making

This section includes policy recommendations that would simplify the student loan repayment process and strengthen data supports to build a more complete profile of student attendance in postsecondary education, and measure labor market outcomes of programs of study. Specific policy recommendations include:

17) <u>Limit Loan Repayment Plans to One Standard and One Income-Driven Repayment Option</u>
Provide borrowers with simpler, more transparent repayment options by reducing the number of plans currently available, and automatically enroll borrowers into the income-driven plan.

Eight repayment plans are available to federal student loan borrowers, including five that are income-driven. When explanations about the Income-Based Repayment plan were provided to borrowers, many had never heard of it and struggled to understand even the basic requirements of the plan.[liii] In addition, many of the income-driven repayment (IDR) plans have similar or the same benefits, but have narrow restrictions around who qualifies or which loans are eligible.

Borrowers who can afford to pay a little more, and who seek to pay less interest over the life of the loan, should be able to continue that option through the current standard repayment plan. However, those borrowers who have greater financial limitations (either temporarily or long-term) should be able to take advantage of a repayment plan that accounts for their circumstances under terms that are clear and not difficult to discern from the other repayment options.

CLASP recommends limiting borrower repayment options from this point forward to two repayment plans: one standard and one income-driven, modeled after the Pay As You Earn repayment plan. Borrowers should be automatically enrolled in the IDR plan, in order to protect those students with low-incomes and low understanding of the benefits of IDR and to prevent delinquency and/or default. In addition, Parent PLUS loans should be made eligible for the IDR plan, to continue to allow borrowers choice in their repayment options, as well as acknowledge that these borrowers might also struggle during repayment and need a plan that is responsive to their financial condition. Borrowers with these loans should also receive entrance counseling at the time of origination, so that they are fully informed about this financial obligation.

18) <u>Update Data Requirements to Reflect Those Proposed in the Student Right to Know Before You Go Act (H.R. 2518/S. 1195)</u>
Expand data collection and disaggregation by creating a student-level collection system to build a more complete picture of students who receive Pell Grants, are in developmental or competency-based education, or who mix their enrollment, as well as the labor market outcomes of programs.

Students, particularly low-income and underprepared students, need access to easily understandable information to help them make better decisions about where to attend college and what programs of study to pursue. Unfortunately, current data systems and reporting requirements are not structured appropriately to aid consumers or policymakers in understanding how well institutions perform across key metrics, including those on access, completion, and outcomes for low-income and non-traditional students. CLASP recommends that Congress address these data gaps by creating a student-level data collection system, such as the system proposed in the bipartisan Student Right to Know Before You Go Act (H.R. 2518/S. 1195), which would implement the following policies:

Ensure data are disaggregated by Pell Grant status to better understand outcomes of low-income students. Policymakers should be able to better target policies to the needs of low-income students, and these students should be able to see how other low-income students fare in institutions and programs they are considering. However, current data systems do not provide enough information to inform such decisions. The Integrated Postsecondary Education Data System (IPEDS) collects data on the percent of undergraduates receiving Pell Grants and the average amount of Pell Grant aid received, but graduation rates are not disaggregated by Pell Grant status. Further, reporting requirements call for institutions to collect and report the graduation rate for Pell Grant recipients, but a survey of 152 public and private four-year institutions found that only 25 percent had graduation rate by Pell Grant status publically available.[liv] This information is woefully inadequate for understanding completion and outcomes for low-income students. We support the changes suggested in the Student Right to Know Before You Go Act, which would address this problem by ensuring that all data elements in IPEDS, plus some new proposed elements, are disaggregated on the basis of Pell Grant status.

Collect student-level information on participation in developmental education to better understand the outcomes of underprepared students. More than half of students entering two-year institutions and nearly 20 percent of those entering four-year institutions are placed in remedial classes. Of those students, fewer than one in 10 graduates from community colleges within three years and little more than a third complete bachelor's degrees in six years.[lv] Currently, IPEDS does not collect data that would identify these students to help inform interventions to improve outcomes. We support collecting student-level data on "students who participate in remedial education at, or through, the institution," as proposed in the Student Right to Know Before You Go Act. This would be an important step toward understanding how to improve outcomes for underprepared students.

Ensure data are reflective of students with mixed enrollment status. As the number of non-traditional students grows, patterns of enrollment are changing, but data systems do not reflect the new reality. A recent study by the National Student Clearinghouse of nearly two million undergraduates found that more than half (52.5 percent) attended a mix of full- and part-time over a six-year period, while 41.2 percent attended exclusively full-time, and just 7 percent attended exclusively part-time.[lvi] IPEDS currently groups students by their status upon their initial enrollment in postsecondary education, which, for half of students, does not accurately describe their attendance status over time. We support the proposed changes made in the Student Right to Know Before You Go Act, which would provide that all data are disaggregated by enrollment intensity, including full-time only, part-time only, and mixed enrollment (both full-and part-time). This strategy would better reflect the growing number of non-traditional students in postsecondary education.

Provide access to data on labor market outcomes, disaggregated by program of study. Students need access to information about their potential future employment and earnings so they can shop around for the programs that best meet their goals and provide the greatest value. Access to reliable and usable labor market information is a critical need that has gone unfulfilled, and is particularly important for low-income and first-generation students. According to a recent survey of students of all ages preparing to attend a variety of institution types, employment and earnings prospects ranked highly as reasons they chose to go to college. For students with incomes lower than $50,000 per year (the lowest income range identified), 91 percent cited “to make more money”; 90 percent cited “to get a good job”; and 90 percent cited “to improve my employment opportunities” as important or very important reasons for going to college.[lvii]

While nearly all students desire to improve their financial and employment future, those who are the least likely to attend college due to socioeconomic barriers are the most likely to benefit from it in terms of subsequent earnings.[lviii] Low-income, first-generation students typically narrow their college search to one or two institutions, usually a result of cost concerns in combination with the limitations placed by their grades and test scores.[lix] For these students, having program-level data is especially important because it can help them select programs that lead to higher paying jobs.[lx] Unfortunately, the availability of high-quality, comparable data on labor market results at the institution and program-of-study levels is limited to a handful of states with excellent consumer information websites.[lxi]

We support the proposal in the Student Right to Know Before You Go Act to provide median annual earnings and employment metrics, broken down by program of study, institution, and type of credential, at one, two, six, and 15 years after completion.[lxii] Using data from the Social Security Administration, this provision would address the major disadvantage of a state-by-state approach, which relies on state-held Unemployment Insurance records that do not cover students who leave the state after graduation. The federal government should focus on collecting employment and earnings data, while allowing other entities with more experience in data presentation to create user-friendly websites or apps that can be targeted at low-income, under-prepared, and non-traditional students.

Allow flexibility to create metrics as the postsecondary landscape changes. The Department of Education should be authorized by Congress to have an expanded role in developing common definitions and data elements. Going forward, innovations in postsecondary education, including increased use of CBE – which measures what students can do, not how long they sit in class – will create the need for changes to data systems between reauthorizations of the HEA. The Student Right to Know Before You Go Act would allow the Secretary of Education the flexibility to collect other information determined to be necessary by the Secretary, which would allow the student-level data collection system to adapt to innovations in postsecondary education.

Finally, while the following recommendations require changes to either the bankruptcy or tax codes, they are significant enough to the effective administration of HEA programs that CLASP feels they should be considered during HEA reauthorization deliberations:

19) Allow Loans to be Dischargeable in Bankruptcy (including Private Loans)

Student loan borrowers who become distressed and need to file for bankruptcy should have the full benefits of that protection and have their student loans eligible for discharge.

Current law severely restricts – and effectively prohibits – the discharge of federal and private student loan debt in bankruptcy. However, there is little rationale for why student loan debt should receive different treatment than other forms of consumer debt. The Consumer Financial Protection Bureau notes that, during debate of the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (which instituted this change in the treatment of student loan debt), there is virtually no rationale provided in the Congressional record on why this limitation was put in place – particularly for private student loan debt.[lxiii]

Private loans, in particular, are problematic because they lack many of the benefits to borrowers that are included with federal loans – such as loan forgiveness, deferment and forbearance options, as well as flexible repayment plan options, including those that are income-derived. Because of these benefits – as well as the collection tools available to the government that are not available to a private lender – there is less likelihood that federal borrowers must rely on bankruptcy protections. However, to deny the option of discharge in bankruptcy is unnecessarily punitive, especially when considering this debt was incurred through students' pursuit of education or training that was expected to better their life circumstances.

Research by many, including an independent commission established by Congress, determined there is no evidence to support the belief that allowing for discharges in bankruptcy would somehow induce more borrowers to file for bankruptcy, or to borrow excessive amounts with the plan to have the debts wiped away in bankruptcy proceedings.[lxiv] Further, federal student loans can have, and some private loans require, co-signers, which can also limit a borrower's willingness or ability to include these loans in bankruptcy proceedings.

CLASP recommends that Congress remove the current bankruptcy limitations on federal and private student loans that are in Sec. 523(a)(8) of the Bankruptcy Code. Bankruptcy protection is especially critical among those with the lowest income, since they are most vulnerable to financial shocks. Among students or student families with adjusted gross incomes of $20,000 or less who borrowed student loans, 68.6 percent borrowed federal loans only, while 31.4 percent had either some mix of federal and non-federal loans, or exclusively non-federal loans.[lxv] This is why it is critical that a bankruptcy discharge for both federal and non-federal loans be permitted.

20) End the taxation of Pell as Income

End the taxation of Pell Grants as income when used for indirect costs of education.

Currently students can apply Pell Grants to any of the expenses associated with attending college, including direct costs like tuition, fees, and books; and indirect costs, such as transportation, housing, or food. Confusingly, however, when students use Pell Grants for direct costs, that portion of their grants is not subject to federal income taxation, but when they use Pell Grants to cover indirect educational costs, such as transportation, food, or housing, that portion of the grant becomes taxable income. This is true even though the Pell Grant award they receive is intended to cover those costs, which are included in student budgets as determined by the college and included in the federal definition of the cost of attendance.

It makes no sense to award low-income students' financial aid through one arm of the federal government and take it away with another. In light of the magnitude of unmet financial need and student indebtedness noted above, this law should be changed. Ending the taxation of Pell Grants would simplify the tax code and better align federal efforts to aid low-income students across the grant and tax systems. Taxing Pell is, in effect, like giving students a lesser award than that for which they qualified. In addition, the interactive effect between Pell and the American Opportunity Tax Credit (AOTC) creates a tough choice for families: whether to apply their AOTC funds (which only covers tuition, fees and materials) – and thus requiring them to pay taxes on their Pell Grant – or to forego the tax credit altogether.[lxvi]

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[xi] Prepared by David Rhodes, *Analysis of the Experimental Sites Initiative 2006-07 Award Year*, Federal Student Aid, U.S. Department of Education, June 2008.
[xii] Mark Kantrowitz, "Income Protection Allowance," FinAid, http://www.finaid.org/educators/pj/ipa.phtml.
[xiii] CLASP, "Yesterday's Non-Traditional Student is Today's Traditional Student," January 2015, http://www.clasp.org/resources-and-publications/publication-1/CPES-Nontraditional-students-pdf.pdf.
[xiv] CLASP analysis of NPSAS data.
[xv] Calculations based on income levels for a typical Pell Grant recipient, according to the *Federal Pell End-of-Year Report: 2010-2011*, U.S. Department of Education, 2012, http://www2.ed.gov/finaid/prof/resources/data/pell-2010-11/pell-eoy-2010-11.pdf and *Proposed Cuts to Income Protection Allowances in the House Fiscal Year 2013 Budget Resolution Would Slash Pell Grants for Needy Working Students*, CLASP, 2012, http://www.clasp.org/admin/site/documents/files/IPA-examples-7-13-12-final-2.pdf.
[xvi] Walizer, *Barriers to Success*.
[xvii] 20 U.S.C. §1098e(a)(3)(B)(ii)
[xviii] CLASP analysis of NCES data.
[xix] Robert Kelchen, Braden J. Hosch, and Sara Goldrick-Rab, *The Costs of College Attendance; Trends, Variation, and Accuracy in Institutional Living Cost Allowances*, October 2014, http://www.wihopelab.com/publications/Kelchen%20Hosch%20Goldrick-Rab%202014.pdf.
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[xxiii]

Student is enrolled in full-time study at:	At this enrollment intensity, the student will complete their program in:	SAP allows for student aid up to 150 percent of program length. This means students should be provided an eligibility period of:
15 credits per semester	4 years	4 years x 150 percent = 6 years
12 credits per semester	5 years	5 years x 150 percent = 7.5 years

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[xxxviii] CLASP analysis of NPSAS data. These characteristics include delaying their enrollment in postsecondary education, lacking a high school diploma, being financially independent, working full-time while enrolled, having dependents, or being a single parent.
[xxxix] Christian Geckeler with Carrie Beach, Michael Pih, and Leo Yan, *Helping Community College Students Cope with Financial Emergencies: Lessons from the Dreamkeepers and Angel Fund Emergency Financial Aid Programs*, MDRC, May 2008, http://www.mdrc.org/sites/default/files/Helping%20Community%20College%20Students%20ES.pdf.
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[xli] 42 U.S.C. §2753

[xlii] Elizabeth Kenefick, *Strengthening the "Work" in Federal Work-Study: Improving Access to Financial Aid and Career-Related Work Experience for Low-Income and Post-Traditional Students*, CLASP, January 2015, http://www.clasp.org/resources-and-publications/publication-1/CPES_FederalWorkstudyFINAL.pdf.
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[xliv] Judith Scott-Clayton and Veronica Minaya, *Should Student Employment be Subsidized? Conditional Counterfactuals and the Outcomes of Work-Study Participation*, CAPSEE Working Paper, September 2014, http://ccrc.tc.columbia.edu/publications/should-student-employment-be-subsidized.html.
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