



SMALL CHANGES, BIG IMPACT: REDUCING ADMINISTRATIVE BURDENS IN STATE FINANCIAL AID

INTRODUCTION

In the first paper in this series, [“Features of Effective State Financial Aid Programs,”](#) NCAN introduced the concept of administrative burden as an important but often overlooked aspect of state financial aid systems. In this paper, we dig deeper into research and offer recommendations for how to reduce administrative burden in state financial aid programs. We also discuss how reducing or eliminating administrative barriers can advance the equitable distribution of aid.

For the purposes of this paper, ***we define administrative burden as the time, energy, and psychological effort needed to apply for, obtain, and maintain state financial aid.*** These can include aid eligibility that is obfuscated or that many students misunderstand, an application process that is confusing to navigate (or a situation in which assistance to navigate is difficult to access), and a financial aid system interface that is unclear or difficult to use. Administrative burdens for maintaining state financial aid might include overly complex processes to receive funds, extraneous or confusing compliance requirements, or systems of doling out aid that are uncertain or unstable—such as programs designed to be first-come, first-served.

As the research in the next section demonstrates, administrative burdens can substantially impact students’ likelihood of applying for and retaining financial aid. Furthermore, administrative burden often has a disproportionate impact on communities with historically lower rates of college enrollment and attainment, such as low-income students or first-generation students.

This paper will explore the research about administrative burden, provide state examples, and offer recommendations for improving state financial aid programs.

ADMINISTRATIVE BURDENS: AN INVISIBLE IMPEDIMENT TO GETTING STUDENTS TO AND THROUGH COLLEGE

Research on administrative burden in government programs has demonstrated that such burdens not only make accessing programs and services more difficult, but they can be actively harmful. Increasing administrative burdens can be harmful to health and increase stress and stigma for those who have to navigate them;¹ and these costs are disproportionately borne by low-income families and households.² Some sociologists view administrative burdens as a key way that the state (government) reinforces inequality.³ Putting up artificial or unnecessary administrative burdens is one way that policymakers indirectly reduce access to programs, often intentionally.⁴

Because administrative barriers are sometimes erected as a passive cost reduction strategy, it is important for advocates to make the impact on program equity explicit to policymakers. When trade-offs must be made in the design of financial aid programs, the needs of low-income and first-generation students should be prioritized: a smaller program serving fewer students but with limited administrative barriers is preferable to a larger one that many eligible students cannot access or maintain.

Low-income and first-generation students are disproportionately harmed by the complexity and administrative burdens inherent in the financial aid system.⁵ Low-income and first-generation parents and students are less familiar with the admissions and financial aid landscape and how to navigate it,⁶ are less likely to accurately estimate the costs of going to college,⁷ and may experience stigma as a result of needing aid or having to meet certain requirements (e.g. drug testing) to maintain aid.⁸

Making the financial aid process simpler can lead to significant changes in students' likelihood of applying to and enrolling in college. In a seminal experiment, tax preparers used the income data they had available from young people or families with a college-age child when they were getting their taxes done. With permission, they then transferred income data over to the FAFSA, which meant that the FAFSA was already two-thirds completed, and the remaining questions only took about 10 additional minutes.

Assistance filling out the FAFSA and streamlining the process led to a large increase in FAFSA submissions, and an increased likelihood that students would apply to, enroll in, and complete college.⁹ Because of these results, higher education policy experts recommend keeping both state and federal financial aid systems as simple and streamlined as possible.¹⁰

This experiment and other research like it led to the passage of the FAFSA Simplification and FUTURE Acts, which changes the FAFSA process to auto-populate income data with verified tax information from the IRS.¹¹ The new process is expected to reduce the number of applicants who will have to go through a separate verification process and minimize the time applicants spend completing the form.

Interventions that reduce administrative burden can have a big impact for relatively low cost. There is a tendency for high-achieving, low-income students not to apply to selective colleges, even though they have the academic qualifications needed to do so and even though attendance at selective colleges is associated with positive outcomes. Yet students who received an intervention with 3 components: application guidance, net cost information, and a fee waiver, tended to apply to and be admitted to more and more selective colleges. The cost of the intervention was only \$6 per student, and it was able to reach students who were geographically dispersed.¹²

Students continue to face barriers after they've been accepted to college, making it important to sustain supports that reduce administrative burden beyond application and enrollment. Accepted students are more likely to go on to attend college if they receive interventions like automated text reminders or offers of counselor support to assist them with completing pre-matriculation tasks.¹³

Students face similar barriers in retaining their financial aid in future years. Sixteen percent of freshmen and 10% of sophomores who receive Pell Grants and meet the qualifications for federally defined good academic standing do not re-file a FAFSA, a step that is needed to continue their financial aid. As a result, these students lose an average of \$3,550 in federal financial aid.¹⁴ Text nudges similar to those described above have also shown to be successful for getting freshman to complete FAFSA refiling to obtain financial aid for their sophomore year.¹⁵

Despite the research that demonstrates the benefits of simplicity and the value of reducing administrative barriers, many state financial aid requirements unnecessarily complicate the process. The FAFSA Simplification Act is leading to progress reducing the administrative burden of applying for federal student aid, but states have been slower to act. A comprehensive analysis of state financial aid programs identified over 350 programs, an average of seven per state. Many of the programs had extraneous requirements like a high school curriculum requirement (10%), college entrance exam score requirements (17%), eligibility only for a special student population (18%), or a requirement that students could not receive other aid (6%).¹⁶

TABLE 1. Selected requirements for state financial aid programs¹⁷
(adapted from Table 3 in “Leveraging insights from behavioral science and administrative burden in free college program design: A typology”)

REQUIREMENT TYPE	EXAMPLES
Financial	<ul style="list-style-type: none"> • Means testing/income determination • Income verification • Repayment of loans • Financial aid application
Academic	<ul style="list-style-type: none"> • GPA proof form • Program specific application • College or field of study restrictions • Signing a pledge in high school or earlier • Maintain continuous or full-time enrollment • High school academic or attendance requirements
Timeline	<ul style="list-style-type: none"> • Application deadline • Renewal (new application, deadlines, fees, GPA beyond federal satisfactory academic progress requirements) • Requirement to live in the state for a specific period of time after receiving an award
Other	<ul style="list-style-type: none"> • Citizenship/non-Citizenship eligibility requirements • Drug testing • Criminal background check • Code of conduct • Volunteering/Mentoring • Parental requirements (e.g.: parents have to sign pledge, enroll students in program)

The administrative burdens that are erected by state financial aid programs exacerbate inequities.

The complexity of financial aid disproportionately harms low-income families and first-generation students who need their aid to stay in college.¹⁸ Sometimes the administrative burdens are irrelevant to either academic preparedness or financial need. Of those who applied to the Tennessee Promise program but did not end up participating, most students lost their eligibility because they missed the mandatory meeting or hadn't completed the required eight hours of community service.¹⁹

In the next section, we analyze state financial aid programs on several metrics to illustrate the ways in which states are and are not heeding the research related to the outside impact administrative burden can have on outcomes.

STATE EXAMPLES

We reviewed the state financial aid programs of several states for: application simplicity; ease with which students can find relevant information; safeguards and supports for finishing the application process; straightforward requirements to maintain the award; and how the state is monitoring equity impacts of the program, particularly as it relates to unfinished applications, losing awards during school, and loss of eligibility.

No state program is perfect; some have a simple application but do not make maintaining the award straightforward, while others without restrictions on eligibility have outdated platforms that are difficult to navigate, making it less likely all eligible students will even complete the financial aid application in the first place.

PROFILE: OREGON OPPORTUNITY GRANT

Summary: Overall, Oregon’s Opportunity Grant is a promising example. It only requires the FAFSA—and has an alternative option for undocumented students—and the deadline isn’t until just before the beginning of the school year in August. There is easy to find information about award ranges, general eligibility, and how to apply.

However, Oregon’s platforms lack clarity about several other pieces of the aid process, from the rule differences between different programs to eligibility information for justice-impacted students to knowing if the application is complete or has any errors. Also, although the Oregon Opportunity Grant does provide a program evaluation to the state legislature each year with disaggregated results, it doesn’t provide actionable data about administrative burden.

Application simplicity

Strengths

- FAFSA is the only application
- Alternative Oregon Student Aid Application for undocumented students

Areas for Growth

- There are multiple programs with little clarity about the overlap and rule differences between them
- There are a few extraneous requirements, for example students have to be a recent high school graduate or GED recipient, and have to attend at least half time continuously to maintain an award

Easy to find relevant information

Strengths:

- Award ranges for 2-year and 4-year degrees clearly posted
- A quick 2-minute video on the front page of the website presents clear information about eligibility, that program is a grant not a loan, how to apply and when application opens
- Clear and prominent link to the application
- All of the above information is easy to find on their website²⁰

Areas for Growth

- \$50 copay is deducted from award amount²¹ and this is not made transparent
- It’s difficult to find information about whether students who are justice-impacted or have a drug conviction are eligible
- May be confusing to calculate eligibility due to switch from adjusted gross income calculation to expected family contribution limit of \$8000²²
- Average award amounts are quite a bit lower than maximum, which makes it likely that students would overestimate what they will actually receive²³

PROFILE: OREGON OPPORTUNITY GRANT - CONTINUED

<p>Safeguards and supports for finishing the application process</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • Deadline isn't until August before the school year starts <p>Areas for Growth</p> <ul style="list-style-type: none"> • No easy way to know if the application is complete or has an error²⁴
<p>Maintaining award is straightforward</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • Satisfactory Academic Progress is only academic requirement for maintaining award <p>Areas for Growth</p> <ul style="list-style-type: none"> • Students who miss a fall semester become ineligible for the award moving forward • Award amounts change each year (but are awarded to neediest students first) • State agency has made large and confusing errors in emailing students about awards²⁵
<p>State is monitoring equity impacts of program</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • Annual report to legislature²⁶ with disaggregated results by race/ethnicity and income (expected family contribution) <p>Areas for Growth</p> <ul style="list-style-type: none"> • Annual report doesn't provide actionable data about administrative burden and program design (aside from overall affordability challenges)

PROFILE: INDIANA FRANK O'BANNON GRANT

Summary: Indiana's Frank O'Bannon Grant is an example of a promising comprehensive program that has several administrative burdens preventing it from fulfilling its full potential. For example, there is a long list of programs and Frank O'Bannon is not the most promoted, despite being the main state need-based aid program. The deadline to fill out the FAFSA for state aid in Indiana is also earlier than the standard FAFSA deadline, and award amounts change every year.

<p>Application simplicity</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • Eligibility information is clear on the grant page • FAFSA is the only application
<p>Easy to find relevant information</p>	<p>Areas for Growth:</p> <ul style="list-style-type: none"> • Main state financial aid website is text heavy, links to elsewhere to find basic information, requires applicants to click through to various external/partner sites, and directs you to an external portal²⁷ • It is more difficult than necessary to find out that the Frank O'Bannon grant is the primary need-based aid program, as there is a long list of programs and the 21st Century Scholars promise program is more heavily promoted
<p>Safeguards and supports for finishing the application process</p>	<p>Areas for Growth:</p> <ul style="list-style-type: none"> • The deadline to fill out FAFSA for state aid (April 15) is earlier than the regular FAFSA deadline (June 30)
<p>Maintaining award is straightforward</p>	<p>Areas for Growth:</p> <ul style="list-style-type: none"> • Award amount changes every year²⁸ and awards were cut during the Great Recession (though they were recently restored)²⁹ • Must remain a full-time student to keep award; grant will be removed from account if a student drops below full time at any point³⁰
<p>State monitors equity impacts of program design</p>	<p>Areas for Growth:</p> <ul style="list-style-type: none"> • No evaluation that the author could identify

PROFILE: MASSACHUSETTS MASSGRANT AND MASSGRANT PLUS

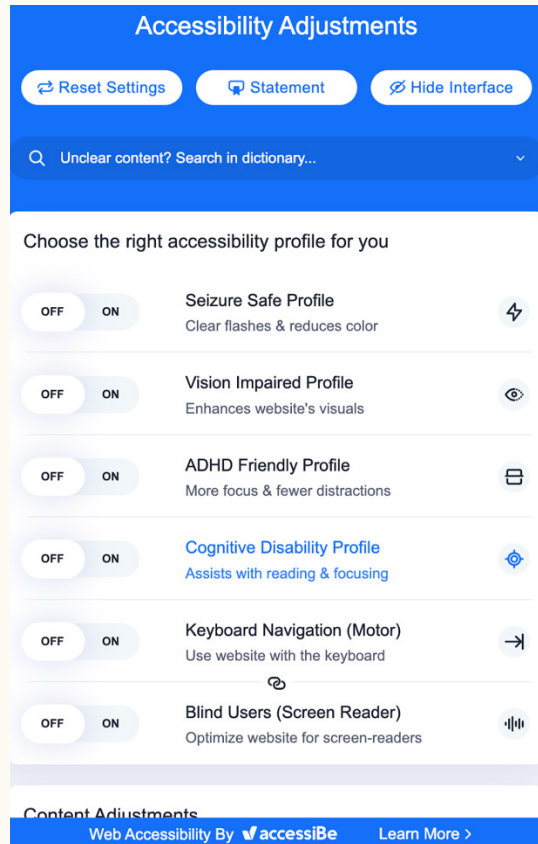
Summary: MassGrant and MassGrant Plus provide need-based aid for Massachusetts residents, and do not have a lot of extraneous requirements for eligibility or to maintain the grant. However, finding information about these programs is difficult given the very long list of different financial aid programs provided by the state. Further, the state does not appear to be monitoring or investing in ensuring that the program is equitable and preventing falloff of students intending to go to college.

<p>Application simplicity</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • FAFSA is the only application <p>Areas for Growth:</p> <ul style="list-style-type: none"> • There is no alternative application for undocumented students
<p>Easy to find relevant information</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • Eligibility information listed clearly <p>Areas for Growth:</p> <ul style="list-style-type: none"> • Very long list of different programs • Two different sites have the same information presented differently³¹ • It is difficult to find the award range or award amounts from the previous year awards to estimate total available funds
<p>Safeguards and supports for finishing the application process</p>	<p>Areas for Growth:</p> <ul style="list-style-type: none"> • No supports or safeguards that the author could identify
<p>Maintaining award is straightforward</p>	<p>Strengths:</p> <ul style="list-style-type: none"> • Satisfactory academic progress is the only academic requirement for maintaining award <p>Areas for Growth:</p> <ul style="list-style-type: none"> • Award amount will change year to year • Students must maintain full time attendance
<p>State is monitoring equity impacts of program</p>	<p>Areas for Growth:</p> <ul style="list-style-type: none"> • No evaluation that the author could identify

STATE FINANCIAL AID WEBSITES: DOS AND DON'TS

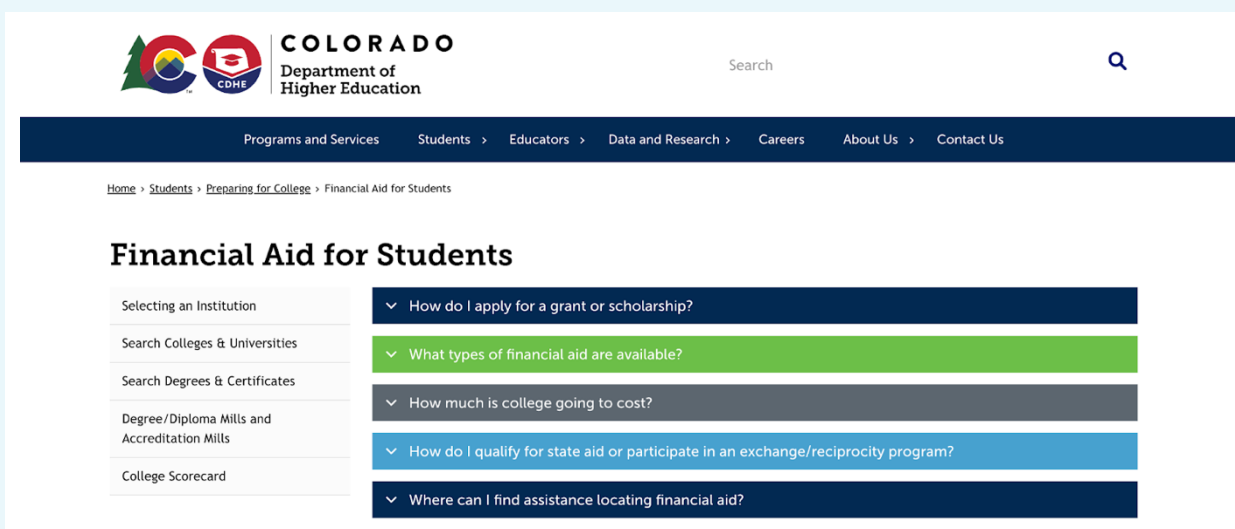
- ✓ **DO: Keep it simple and streamlined**
- ✓ **DO: Make sure your website is accessible** for persons with disabilities

Exemplar: [Washington Student Achievement Council](#)



- ✓ **DO: Put the “bottom line up front” by putting key information at the top or in an easy to see location**

Exemplar: [Colorado Department of Higher Education](#)



- ✓ **DO: Use human-centered language that** avoids technical jargon, acronyms, or niche terms that may confuse people who are less familiar with financial aid policies.
- ✓ **DO: Chunk information,** a design best practice and cognitive processing tool that is proven to help users comprehend and retain information. For example, simplifying the process into 3 steps.

Exemplar: [Montana University System](#)

How To Get Started With Financial Aid

We encourage every student to apply for financial aid, no matter your background. Although the process may feel overwhelming at first, starting early and staying organized will help make it manageable. Follow our guide for getting started with financial aid, and find out how you can earn hundreds — even thousands — of dollars towards your education.

1. Learn About the Types of Financial Aid →

Financial aid isn't just one-size-fits-all. There are several different forms of financial aid, each with different application processes, eligibility requirements, and responsibilities that come with them. Learn the difference between aid types such as grants, loans, scholarships, work study, and tuition waivers so you can find an aid option that works for you.

2. Calculate Your Potential Aid Package →

Your potential financial aid package can seriously lower the cost of a college education. The financial aid forecasting tool allows you to use information about your and your family's finances to estimate how much aid you can expect to receive. Calculating your potential aid will be useful for helping you determine how much money you need to save for college.

3. Start Applying for Financial Aid Today →

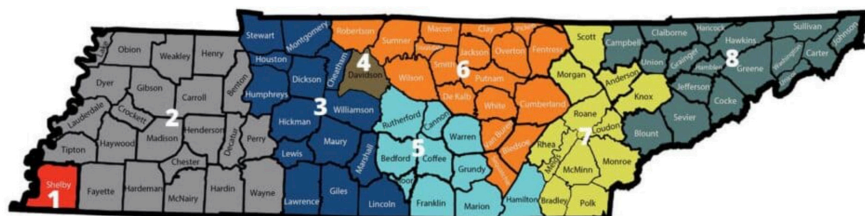
Financing your education can be stressful, but you don't have to do it alone. Learn about the process of applying for financial aid and get the ball rolling — familiarize yourself with the steps to apply for financial aid and make note of important deadlines for your application.

- ✓ **DO: Link to the FAFSA application** if that is the first step for students to receive state financial aid.
- ✓ **DO: Include a financial aid calculator** that students can use to estimate awards
- ✓ **DO: Provide clear information about state financial aid award amounts**
- ✓ **DO: Let students and families know where to find in-person support**, which is the gold standard for helping families navigate the financial aid system.

Exemplar: [Tennessee Higher Education Commission](#) provides local contact information for financial aid specialists in every area of the state on the front page of its website

THEC OUTREACH TEAM

Below is contact information for our Tennessee Higher Education Commission (THEC) Outreach Team. These Outreach Specialists travel the state sharing information about Tennessee financial aid and federal aid programs. Reach out to your Outreach Specialist if you have questions!



- + **SHELBY COUNTY (1)**
- + **WEST TENNESSEE (2)**
- + **MIDDLE TENNESSEE (3)**
- + **DAVIDSON COUNTY (4)**
- + **SOUTHEAST TN (5)**
- + **UPPER CUMBERLAND (6)**
- + **EAST TN (7)**
- + **FIRST TN (8)**

- ✗ **DON'T: Hide key information** on an interior part of the site that requires several clicks to navigate.
- ✗ **DON'T: Make applicants wade through long lists, or walls of text.** One state website had an extensive list of financial aid programs, many named after prominent state figures or the legislators that created them, with no way for a student or parent looking at the site to differentiate between the statewide, need-based aid program and niche scholarships for special populations or students studying a particular subject.
- ✗ **DON'T: Fail to update hyperlinks.** On one state financial aid website we visited, when you click “learn about grants” from the home page, the link was broken.

FOR ADVOCATES: CREATIVE WAYS TO INFLUENCE ADMINISTRATIVE BARRIERS

Once administrative barriers are erected it can be difficult to remove them, especially when requirements sound good but reduce equity in the award process, such as community service requirements. The best approach is to prevent state legislators and state administrators from adding administrative burdens in the first place. The research described in this paper can be an important advocacy tool in preventing these types of extraneous requirements from being added to financial aid systems.

Advocates can also work to include participatory processes in program design so there are chances for impacted communities and those who work with them to weigh in. Because many administrative burdens are not statutory, influencing the regulatory process is an important way to improve program design for students. There should be opportunities to provide input on the state financial aid website or portal to ensure a user-friendly interface, and the end result should have no broken links, and easy to find eligibility requirements and award amounts. There should be opportunities to provide input on the state financial aid website or portal to ensure a user-friendly interface, no broken links, and easily accessible eligibility requirements and award amounts.

Finally, advocates should ask states to regularly evaluate their state financial aid programs, including by analyzing disaggregated data and information at key points in the process that may indicate the impact of administrative burdens, such as partially completed financial aid applications, or loss of financial aid awards or eligibility.

POLICY RECOMMENDATIONS

There are several policy solutions that all states should consider to reduce burdens in their existing programs and ensure any future grants are created with equity and accessibility in mind.

1. Applications and eligibility should mirror federal program requirements.

Reducing complexity is important, and requiring additional applications on top of the FAFSA that students are already filling out creates an unnecessary burden for students who would otherwise be eligible for state programs. The one exception to this is students who are not eligible to complete the FAFSA, such as undocumented students, for whom states should create a separate but similarly streamlined application.

Since many states face cost constraints in their financial aid programs, we recommend starting with a simple program that serves fewer people rather than a program that eliminates potential students through administrative barriers. This would allow programs to demonstrate proof of concept through higher postsecondary enrollment and re-enrollment rates, and then grow based on the program's success. The inverse often makes a program appear to be ineffective, if administrative burdens lead to lower than expected uptake rates.

Just as the application for financial aid should mirror FAFSA, the rules for maintaining state aid should align with Pell (e.g., satisfactory academic progress requirements, appeals process, withdrawal deadline, number of semesters/credits covered) to ensure that students won't lose access to state aid while retaining the Pell Grant. Finally, there should not be any extraneous requirements such as a criminal background checks, age restrictions, maximum time since graduation, occupational limitations, GPA cutoffs, restrictions on part-time enrollment, or community service requirements to receive state need-based aid.

2. States should increase funding for behavioral interventions.

Counselors are irreplaceable, and reducing the administrative burden won't eliminate the need for human support, especially for low-income or first-generation students who need help navigating the system. Still, simplifying the process, reducing administrative burdens, and incorporating automated nudges like text messages will make it possible for counselors to give individualized attention to more students.

3. Prioritize ease of use for students over ease of administration for the state agency.

The platform design and user experience for a student navigating the system might be easy to overlook, but websites and portals that are user-friendly and easy to navigate can make a big difference for students trying to research their options and complete the required paperwork. Specifically, the interface should be intuitive, should provide the most important information up front, and should include features like: estimated award amounts, how state financial aid interacts with other aid (e.g., whether it is first dollar or last dollar), personalized award estimates (e.g., award calculator), and if applicable information about automatic enrollment and automatic renewal of scholarship.

States should also consider uniform branding and consistency across pages and programs. Co-designing sites and systems with students, counselors, and nonprofits through community engagement and UX testing will ensure the platforms meet everyone's needs. Lastly, automated nudges and reminders to students and to secondary schools or enrolling institutions, especially about common mistakes that could prevent students from receiving aid, can keep relevant parties apprised of students' status and help them to provide additional support.

4. Hold state legislators and programs accountable through program evaluation.

Many current programs claim “free college for all” but erect administrative burdens—sometimes as an intentional cost-cutting strategy—that significantly curtail uptake. In practice, this can mean that a very low percentage of students are able to actually receive free tuition. Worse, details in the fine print—like whether funds can be used for fees, books, and/or living expenses; whether there are extra requirements to maintain aid eligibility; and whether the aid is rescinded if a student drops to part-time attendance—can have an outsized impact on low-income and first-generation students. These students may not be able to afford uncovered expenses, are more likely to have caregiving or financial responsibilities that force them to drop to part-time enrollment temporarily, and may not have the resources or assistance to navigate lots of complicated requirements and deadlines.

A thorough program evaluation that provides disaggregated data about the proportion of income-eligible students that receive maximum benefits and at what inflection points students might lose state financial aid, can provide transparency as to how well a financial aid program is serving the state’s students. Qualitative information about why students say they decide not to apply for aid, whether there are financial reasons they do not matriculate, or reasons they were unable to maintain their state financial aid can supplement these data and provide additional context for how to improve programs and make them more equitable.

CONCLUSION

Though college affordability and top-line financial aid numbers are often (and rightly) the main focus of policymakers, details of program structure that add to or reduce administrative barriers are also important. These barriers—whether intentional or not—should not be overlooked in program design and revision by either advocates or policymakers. Crafting a program that is easy to figure out, with a simple application and clear requirements, and with some safeguards and supports to assist students navigating the process can have a big impact on whether students apply for financial aid and ultimately graduate from college.

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